

## ECO4 scoring methodology: part 2

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Response from Pacifica Home Services –

We are an ECO installer of both heating and insulation measures and have been involved with ECO since inception in 2013.

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Generally we believe the approach to scoring is far too complex and fraught with problems but we have fed this back as part of the ECO4 consultation to BEIS

### Questions

**Question 1:** Do you agree with our proposed format for partial project and full project scores? Please provide reasons for your answer, and if applicable alternative suggestions with justification including as much detail and evidence as possible.

Yes the CSV format is fine, and it worked well in ECO3

**Question 2:** Do you agree with our proposal to include fixed value uplifts into our scoring matrix and for fixed value uplifts to be notified as measures?

Yes

**Question 3:** Do you agree with our proposal to require a post-retrofit RdSAP assessment to determine a project's finishing SAP rating (option 1)? Responses will be considered alongside those received on this topic during part 1 of our scoring consultation.

Option 2 calculated SAP would be our preferred option, until SAP10 is available. Current version of SAP does not model ASHP efficiency correctly nor does it allow controls to be added to a heat pump measure, meaning SAP points would like to be lost if using finishing RdSAP, meaning there is a Risk of not meeting the MR and having costly deflators applied unnecessarily

**Question 4:** Do you agree with separate measure and project notifications? If not, would you prefer a single notification? Please suggest any pros and cons to either approach that have not been included above.

Yes

**Question 5:** Do you agree with our proposal to award deflated PPS to the final measure in a project? If not, please suggest an alternative.

No – I think proposed scoring is far too complex – and will lead to inflated PPS to avoid risk, far better have true base scores and bonus uplifts for completion of project. Carrot rather than stick.

Many of deflated scenarios will be outside of installers control, customer cancellation, customer died moved, PAS changes a la IWI and 100% of measure required.

It would be better to allow full measure score and cost and offer a bonus for multi measures

**Question 6:** Do you agree that in ECO4 we should continue to require supplier generated MRNs to for all measures? If not, please propose any alternative options.

Yes

**Question 7:** Do you agree with our proposals for determining the point of completion for the project? Can you suggest any alternatives to determine that a project has been

Yes

**Question 8:** Do you agree with the assumptions used to develop the partial project scores? If not, please suggest where the assumptions should be changed.

No the annual saving are to out of date 2012 SAP ? and have little relevance to actual customer bills. Installers should be paid for the measure they fit as in the able to pay market. It seems it just a token currency to measure energy companies by.

**Question 9:** What are your views on our proposal to remove the wall type distinction for heating measures?

Yes we are happy to remove wall types, the annual savings for heating are largely inaccurate so it makes sense not to skewing them further. Or add complication

**Question 10:** Do you agree with our proposal to split the standard heating control measure into a programmer and room thermostat measure and a TRV measure?

Yes this makes sense

**Question 11:** Do you have any suggestions on how heating control measure category could be further simplified?

No – if you want to accurately reflect what is fitted and a means of payment for each then they need to be separate.

**Question 12:** Do you agree with the proposed changes to the notification of rare heating systems? If not, please provide alternative suggestions.

Proxies work fine but should consider adding ASHP as they start to come to the end of their life. First pumps fitter around 2010

**Question 13:** What are your views on our proposal to remove pre-main heat source for insulation measures?

This make sense

**Question 14:** Do you agree that the number of u-value variants for solid wall insulation measures should be reduced? If not, please provide alternative suggestions.

Yes many are not used enough

**Question 15:** What are your views on our proposal to have a combined park home insulation measure?

They should remain separate as there are reasons why a floor, wall or roof are not possible to fit and historically individual measures have not caused damp issues if they have been correctly fitted. Whilst fitting all should be the goal, fitting at least over 50% which has been the norm in ECO to date (pre PAS) has provided significant benefit to home owners

**Question 16:** Do you agree with our proposal to retain the distinction between single and double park homes by creating a “PHI single” and “PHI double” measure?

Yes this makes sense

**Question 17:** What are your views on the addition of partial project scores for pitched roof insulation, hybrid wall insulation and district heating system connection measures?

Yes this makes sense

**Question 18:** Do you agree with the approach and assumptions used to derive the scores for the pitched roof insulation measure? If not, please provide alternative suggestions.

Yes

**Question 19:** Do you agree with the approach and assumptions used to derive the scores for the district heating system connection measure? If not, please provide alternative

Yes