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Please find below our response to Ofgem ECO4 Consultation: scoring methodology - part 2
<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-consultation-scoring-methodology-part-2>

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.

We agree with the proposed format and file type. This should make integration the most straightforward.

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? If not, please indicate your preferred alternative.

Agree

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.

We note that PAS requires this and alignment as such support this. It is worth noting that the EPC action plan progress report does not demonstrate an entirely robust or suitable EPC methodology, and it is unlikely that the outstanding action points will be completed before the commencement of ECO4. With this in mind we would caution against any assumed or over-reliance on EPC's given the potential for variance due to minor input changes.

That said, assuming the verifying any inputs are policed by the appropriate scheme providers or certification bodies this should provide suppliers with sufficient assurance, and not require us to further verify the content.

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.

We agree that separate measures and project notifications will make the process as simple as possible given the very nature of its complexity.



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

We do not agree with the need to award deflated PPS to the last measure in a project; as long as one of the measures (or all of them) in the project have the final date ascribed. This would prevent the incidence of an administratively burdensome episode amending all other measures in any scenario where the final measure is rejected.

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

Agree

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 completed?

Agree

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

Agree

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

Agree

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?

Agree.

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

On the new basis of the boiler plus coming into effect for Scotland and Wales, this would be a fortuitous time to remove compensation controls as a measure type again; reabsorbing those scores back into boilers.

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

Agree

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

Agree, given the scoring methodology

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.



We note that some of the suggestions do not comply with Building Regulations. This should be simplified and aligned with the Building Regulations (which are due to be updated in June of this year and thus need to be futureproofed as well).

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

We strongly believe oversight should sit with industry bodies where possible. As such, alignment with PAS is crucial to any such proposals.

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?

As above.

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?

Agree

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.

Agree, this seems to make sense.

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 suggestions.

Agree

Yours sincerely

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