

Hi Eric,

Hope you're well, please see below a few points on the ECO4 Scoring Consultation from ourselves for your consideration.

- We would like to raise a concern over using the out-dated SAP2012 tariffs as opposed to SAP10 and would recommend that these are updated as soon as possible considering recent and further anticipated fuel price rises. It is our prime objective to help combat fuel poverty and annual running costs must be more accurately aligned with real world prices over the course of ECO4 (four years).
- Full project scores. When an installer has several measures to install, from a funding point of view they are paid a partial project score for each measure until the full suite of measures are installed. This seems problematic in a funding model as a final project outcome will not be known for quite some time, i.e. measure withdrawals can take a long after the installer has been paid. It would make sense for a funder to pay partial project score payments and withhold the full project score payment until the installed measures are deemed secure. Only then would a funder want to settle the account on the complete job. The issue being is that it will be much harder to claim monies for withdrawn measures from an installer.
- For non standard ECO measures where something has been installed and the measure is monitored to evidence the energy improvement, who pays for these and who administers the acceptable measures list? It appears that an installer can select a product that is not currently part of a standard ECO measure, install it and claim that it is saving energy. If they provide energy saving monitoring data and if it is deemed acceptable they get paid for it. This does not seem practical and there is a need for detailed guidance on what should fall into this measure category, where the funding comes from and how much, and who administers it and the mechanism for claiming.

Please let me know if you need any further clarification on any of the above and we look forward to receiving the second administrative consultation planned for March 2022.

Best regards,

Mark



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