

Dear Will Broad,

Please find below Northgate's response to Energy Companies Obligation (ECO): Consultation on how to account for the percentage of measure installed when calculating ECO scores.

Northgate's approach to Eco has been based around the current guidance and incorporates the "P" approach that is identified within the consultation.

Whilst we appreciate that the current % method may have limitations and potential error factors depending on the installed measure. Any alternative must be easily modelled within any ECO software.

We would support a move to modelling the property and measure within the SAP/RdSAP, but only where the modelling is conducted by a qualified/accredited individual and the software is able to support the required steps. Any supplementary calculations should be conducted within the accredited software to remove any risk of "user error". The additional calculations required would benefit from the existing EPC audit and convention regime already in place.

Care should be taken to avoid the opening up of building modelling within both SAP and RdSAP to unaccredited individuals, which can at present be the case with the alternative "P" method. By removing the "P" method this will introduce a complex approach to alternative element calculations which will be best performed by accredited Energy Assessors rather than desk based energy company individuals.

Where a move away from the "P" approach is taken and a change to current ECO scoring software is envisaged, then a controlled roll out of both spec and delivery should be planned to ensure that both energy companies and software providers are aware of the change date and give sufficient time to incorporate any changes, whilst being able to continue to support the industry with an auditable approach to the current calculation approach. Additionally where a new approach to alternative elements is taken for items not currently supported within the base underlying methodology or software (SAP/RdSAP) then this will need to be considered along side any change date planned for the move away from the "P" approach and any currently planned changes to the methodology and software (SAP/RdSAP).

Northgate would welcome the opportunity for further discussion and/or respond to any questions you may have.

Regards

Neal Gascoine  
EA/EPC Quality Assurance Controller  
Energy Efficiency