

Energy Company Obligation (ECO) Deemed Scores Consultation Questions

Background

The questions below relate to the ECO2 consultation on deemed scores which can be found on our website :

<https://www.ofgem.gov.uk/publications-and-updates/eco2-consultation-deemed-scores>

Notes For Completion

Please complete all relevant sections of the document by selecting an answer for the question and then providing reasons/evidence for your response in the box provided. The questionnaire should be completed in typeface and returned via email to eco.consultation@ofgem.gov.uk by **close of business on 8 July 2016**.

1. Respondent Details

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2. Methodology

Q1. Do you agree with our selection of the key variables to use as the main inputs for calculating the deemed scores?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☒ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please clarify which aspect you do not agree with and suggest an alternative, with reasoning.

Many insulation measures are used solely for energy performance coupled with carbon saving: whereas others are multi-purpose. For instance, the use of polyurethane foam (with superior insulation performance) can also be used to solve other 'problems', such as stabilising walls and roofs.

Deemed scores should be designed to ensure that measures installed in a building are recommended as the most suitable for that building, taking into account other environmental and other variables. Some materials not only improve the thermal performance and carbon saving of that building but can also provide protection against other threats to the integrity of the building structure such as from ingress of wind driven rain and flood resilience, which is becoming more important with increasingly erratic weather conditions.

3. Property Archetypes

Q2. Do you agree with the method used in developing typical property archetypes in order to remove the need for measuring property dimensions?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☒ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please clarify which aspect you do not agree with and suggest an alternative, with reasoning.

A large proportion of properties in the UK do not fit into the typical property archetypes. They may be classed as Hard-to-treat such as the following types:

- Coursed stone and random stone properties having non-standard cavities
- Narrow /irregular cavities which have been incorrectly classified as solid walled
- Non-traditional house systems
- High rise blocks
- Properties with structural defects, corroded or missing cavity wall ties, weak defective mortar joints, defective damp proof courses
- Properties unsuitable for traditional cavity insulation measures due to exposure to high wind driven rain conditions
- Properties unsuitable for external wall insulation due to planning restrictions and structural problems
- Properties unsuitable for internal wall insulation due to unacceptable disruption of tenants and costs of relocation
- Properties at risk of flooding
- Properties with no damp proof course

This is particularly relevant, as for instance, over 23%, or 4.7 million out of the 19.6 million cavity walled domestic properties in Great Britain do not have cavity wall insulation according to the 'Household Energy Efficiency National Statistics, Detailed Report 2015', published by the Department of Energy & Climate Change in March 2016. Most of these are classed as 'hard-to-treat' dwellings which simply means that they are more difficult to insulate. It is these properties that are continually missing out on adequate insulation measures because they do not fit into the typical property archetypes.

4. Primary Heating Sources

Q3. Do you agree with the approach to accounting for all primary heating sources present in the housing stock?

- ☐ Strongly Agree
☒ Agree
☐ Neither Agree Nor Disagree
☐ Disagree
☐ Strongly Disagree
☐ Don't Know

If not, please explain your reasoning and evidence your preferred approach.

Q4. Do you agree that we have appropriately accounted for heating systems present in the housing stock either as an input for the deemed scores or in Table 1?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please clarify which additional heating systems you believe need to be accounted for.

5. Measure Types

Q5. Do you agree that the deemed scores include all main measure types?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please clarify which additional measure type you expect will be installed.

Q6. Do you agree with our proposals for differentiating within measure types?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

☒ Strongly Disagree

☐ Don't Know

If not, please clarify where alternative differentiation should be applied.

Whilst, we agree that it is important to differentiate within measure types, this does not go far enough. Certain insulants have much higher levels of insulation and this is simply not accounted for. Nor is the fact that some insulation measures are multi-function, i.e. not just for energy performance and carbon saving.

To explain this, standard forms of cavity wall insulation may not be possible in a number of situations. These properties may have irregular or narrow cavities which restricts the use of injected insulation methods, or have defective/corroded wall ties, or be unsuitable for external wall insulation due to planning restrictions. Other reasons could be where internal wall insulation may disrupt tenants, or those located in high or severe wind driven rain exposure conditions, or where properties are at risk of flooding. But polyurethane foam is normally suited to all these types of properties.

Many of these properties were not insulated under previous Government grant schemes – it is not acceptable that householders with specialist problems or barriers to insulation (numbered in millions) should be excluded. Furthermore, many of these occupants are elderly and/or vulnerable.

BUFCA believes that radically improving the energy efficiency of the 4.7 million hard-to-treat cavity homes and millions of solid wall homes without insulation in the United Kingdom represents the most cost effective long-term solution for tackling high domestic energy bills and eradicating fuel poverty.

Q7. Are there any measure types where you think that further differentiation is warranted? If so, please clarify which measure type could benefit from further differentiation and suggest an approach.

Sprayed and injected polyurethane foam certainly needs further differentiation.

The consultation fails to take fairly into account current local authority requirements for use of injected closed cell polyurethane as a seamless insulation solution which can offer a more robust solution with much greater thermal efficiency, draught proofing, structural stabilising and flood protection for all properties, but particularly those which are classed as 'hard-to-treat'.

For example, injected closed cell polyurethane insulation is often the most cost effective solution for properties with 'hard-to-treat' cavities, i.e. properties with structural defective/corroded wall tie problems, properties which are unsuitable for external wall insulation due to planning restrictions, for properties unsuitable for internal wall insulation due to unacceptable disruption of tenants and costs of relocation, for properties in high wind exposure conditions, and for properties in severe wind driven rain exposure conditions or at risk of flooding.

Differentiation should also be made between 'open' and 'closed' cell polyurethane foam as these two types are used in different applications. For insulation performance closed cell polyurethane foam should be used.

Q8. Are there any areas where you could benefit from further guidance in using deemed scores?

N/a

6. Scores

Q9. Do you agree with the deemed scores produced?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☒ Strongly Disagree
- ☐ Don't Know

If not, please clarify which particular score(s) that you believe do not accurately reflect the savings for a measure.

No.

- The property types do not account for hard-to-treat and other non-typical properties or situations.
- Higher insulation performance materials (specifically injected or sprayed polyurethane foam) are not accounted for.
- Some insulation measures have other benefits and these are not factored into the equation.

Q10. Do you agree that it would be useful to also provide the deemed scores as lifetime savings (i.e. after applying all relevant multiplication factors), to make the relative value of each measure easier to identify?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

7. Percentage of property treated

Q11. Do you agree with the proposal to use 'percentage of property treated' to identify whether 100% of a score should be claimed?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please explain your reasoning.

8. New Scores

Q12. Do you agree with our proposed approach for applying for a new score from April 2017?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please explain your reasoning, which specific parts of the process you do not agree with and inform us of your preferred approach.

Whilst we accept that scheme simplicity is an important aspect, materials such as sprayed or injected polyurethane foam which have a number of benefits are disadvantaged because the deemed scores only account for energy and carbon saving, although there are some important reasons for installation (other than for insulation purposes), such as installations can be carried out in properties or situations where other materials are ruled out.

There is a large proportion of housing stock, such as hard-to-treat properties, which is under-performing in terms of energy and carbon saving and this has largely been overlooked in favour of carrying out insulation of standard construction types with cheaper materials.

9. Score Monitoring

Q14. Do you agree that a DEA is not required to check inputs used when identifying a deemed score for a measure?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please clarify why you do not agree and provide an alternative approach with your reasoning.

Q13. Do you agree that we should determine whether or not to accept an application, and specifically what is a 'significant' improvement in score, on a case-by-case basis?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know