

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

Organisation Name:	JNR Contracting Ltd
Completed By:	Jamie Robson
Contact Details:	Jrobson@jnrcontracting.co.uk or 07768 501746

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

I agree with your selection of the key variables to calculate deemed scores should they be used. It should be noted I disagree with deemed scores being utilized in any process.

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.

Properties come in all sorts of shapes and sizes, and there has been thousands of different builders who have operated within the UK over the years. Generalisation of property archetypes allows for inaccurate carbon scores to be calculated and allows for an inappropriate declaration of carbon savings made. The facility is already in place to provide accurate carbon scores via RdSAP and this should be allowed to continue as it is.

Millions of pounds was spent on training DEA's, all of which was encouraged by the government under the previous regime. Discarding the procedures, the core structure that has been in place, not to mention the people and the qualifications they have achieved under the governments encouragement is a grave mistake.

Previous documentation and quotes have referenced cutting bureaucracy and red tape. You need to take aim at the paperwork involved and arduous submission processes, not the person you have enforced the training and upskilling of.

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.

The Heat Pumps Central Heating deemed score of Mains Gas will prove wildly inaccurate and will encourage the use of energy saving measures on properties that are already light years ahead of their counterparts. RdSAP should continue to be used where these properties can be accessed accurately.

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.

I agree with the identification, however not with the deemed score inputs as the end result.

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

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

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.

Cavity Wall Insulation needs a much bigger variance. Condensing almost 10 different age bands of housing into two bands represents a lazy generalization that does the carbon savings industry no favours. The accurate RdSAP age bands help understand carbon savings far more accurately. The fact is that there are more modern buildings out there that have been built to older specifications, and as such can be and should be insulated.

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

No, they should not be used.

6. Scores

Q9. Do you agree with the deemed scores produced?

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

The deemed scores produced for the Room In Roof measures do nothing other than ring the death knell for that measure and the installation companies that install it.

On average, under RdSAP those measure are achieving between 40 – 50 carbon tonnes. Your work on this with the BRE has reduced the tonnages by almost 75%. This measure seems to be driving the carbon savings for the utility companies at the moment, and the impact your reduced scores will have, will not only make it harder for them to achieve targets, but will also result in job losses and closures of companies due to the increases needed from customers needing to contribute to make the measure work.

It is a very aggressive attack on that sector a tonnage cut like this, and you might not even realise it.

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

The approach of using deemed scores will result in massive job losses across the industry, in a sector that has already been decimated by poorly implemented and thought out schemes. Over the last twelve months, the scheme has finally started to work, and funding has been readily available. Companies have actually had job security.

I understand the industry was crying out for the cutting of red tape, but this was the paperwork, the administration processes that some of the utilities were mismanaging so badly. Instead you have taken aim at another job role within the sector.

You set up an Infrastructure and processes for everyone to follow, and now you are looking to remove these items right from the process. It might make the calculation aspect easier, but again the number of installation companies and people operating within the sector will reduce.

This, coupled with the massive reductions facing the room in roof industry remove one of the measures that's still in plentiful supply and suppliers will actually pay for it.

If these decisions go through, they could put thousands out of work, and close dozens of installers.. again.

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

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

DEA's should be used, at the very least to make sure the score is within 10% of the deemed score. If it is not, then an override procedure should be put in place. One that doesn't involve 'lab testing'.

If you decide to go ahead without DEA's and accurate scores, getting TM agents to check properties against RdSAP is a waste of time.