

# 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](mailto:eco.consultation@ofgem.gov.uk) by **close of business on 8 July 2016**.

## 1. Respondent Details

Organisation Name:	Tighean Innse Gall
Completed By:	Stewart Wilson
Contact Details:	Tel: 01851 706121

## 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.

We agree with the factors highlighted but this approach singularly fails to deal with the exposure and rurality issues. Differences in wind speed index and the degree day reduction in Scottish Highland & Island areas, which are predominantly off-gas, result in higher fuel costs (Average fuel bill in Western Isles is £1900-£2300 per annum) and thus these areas suffer from the most extreme Fuel poverty in the UK. In addition the rurality issue increases the cost of measures over that experienced by more urban properties. The deemed score matrix should recognize this with an uplift for rural areas (e.g. areas as defined for general CSCO) if the proposals are to be serious about tackling Fuel poverty in those geographic areas which suffer most. This could be treated similarly to the proposed % of measure completed acting as a multiplier but with a rural postcode acting as an uplift multiplier.

### 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.

Property archetypes have to recognize that for rural areas the type sizes proposed underestimate the reality and are not representative. This could be adjusted by keeping the types but including a 10% uplift for rural areas (defined as for general CSCO).

Failure to accommodate this will be a further barrier to delivery of measures to those people in the geographic areas most affected by fuel poverty. Western Isles, Orkney Isles, Rural Highland & Scottish West coast, Scottish Borders, Rural Wales. And rather than focus delivery to the areas with most prevalent Fuel Poverty the proposal will result in funds being strongly biased to those areas more in line with the archetype. Thus the aspiration to tackle the real fuel poor will only be achieved in any significant way in the urban English towns particularly South of Nottingham (the climate archetype).

#### 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.

There is no differentiation for virgin loft.

Also for SWI the depth value vs deemed score is only applicable for those types of material with the same thermal Conductivity and thus better insulants which offer thinner solutions to reach the same uvalue will have to be calculated. It would be a simple exercise to have a 'Table 3 for the common bandings of insulants used on SWI eg 0.04-0.045W/m.K, 0.03-0.04W/m.K and 0.018-0.03W/m.K. This would avoid the need to calculate, reduce administration for utilities but better reflect the reality of the improvement.

**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.

In terms of both Room in Roof and SWI the differentiation does not reflect the rural house types well as it underestimates the sizes. The current bank of completed measures on the EPC data base could inform the deemed scores for a rural uplift.

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

How the SWI scores will be dealt with in practice by the utilities. If we have to use a deemed score but also calculate a uvalue then potentially we could be making the process more bureaucratic and burdensome rather than less.

## 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.

The SWI tables are confusing in terms of trying to determine which wall type they refer to.  
The room in roof table significantly underestimates the savings (by -30 to -50%) of the larger but most common rural house type saving in 3 bed det bung elec/solid fuel heating.

**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.

Agree with the principle but the detail is lacking on how this will be calculated for the range of measures. e.g. should the deemed score adjustment for the SWI measure, where for examples there are mixed wall types, be based on footprint length proportion of each type or wall area proportion or other? If 100% of the wall area available for the measure is insulated will this deem a 100% claim?



## 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.

**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

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