

Ofgem: ECO 2 Consultation Deemed Scores

Date: 8th July 2016



The Sustainable Energy Association is a member based industry body offering innovative policy solutions that link up building-level technologies and the wider energy system to achieve a low carbon, secure energy future for the UK, benefits for UK consumers, and commercial growth for businesses working in the sector.

Our membership is comprised of a wide range of organisations that engage to develop our policy positions, establishing member-led working groups and a governing body of members to discuss and authorise policy positions.

Response to: eco.consultation@ofgem.gov.uk

Response deadline: 8th July 2016

Link to consultation document: ([link](#))

Question 1: Do you agree with our selection of the key variables to use as the main inputs for calculating the deemed scores? If not, please clarify which aspect you do not agree with and suggest an alternative, with reasoning.	The Sustainable Energy Association (SEA) consider the three factors: property type and size, primary heating system and, the measure type installed are sensible with regard to calculation of deemed scores for energy saving measures.
Question 2: Do you agree with the method used in developing typical property archetypes in order to remove the need for measuring property dimensions? If not, please clarify which aspect you do not agree with and suggest an alternative, with reasoning.	The SEA consider that the method detailed with regard to establishing property archetypes seems prudent.
Question 3: Q3. Do you agree with the approach to accounting for all primary heating sources present in the housing stock? If not, please explain your reasoning and evidence your preferred approach.	The SEA considers the heating systems listed in the consultation broadly represent heating systems available to consumers currently.

<p>Question 4:</p> <p>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? If not, please clarify which additional heating systems you believe need to be accounted for.</p>	<p>The SEA considers that the heating systems are fairly represented with regard to their potential for delivering energy savings in this consultation.</p>
<p>Question 5:</p> <p>Q5. Do you agree that the deemed scores include all main measure types? If not, please clarify which additional measure type you expect will be installed.</p>	<p>The SEA consider that the deemed scores consultation broadly represents the measure types available to consumers.</p>
<p>Question 6:</p> <p>Q6. Do you agree with our proposals for differentiating within measure types? If not please clarify where alternative differentiation should be applied.</p>	<p>No comment</p>
<p>Question 7:</p> <p>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.</p>	<p>No comment</p>
<p>Question 8:</p> <p>Q8. Are there any areas where you could benefit from further guidance in using deemed scores?</p>	<p>The SEA suggest that deemed scores should not score 'soft' measures which can rapidly pay for themselves with regard to promoting measures for ECO. The SEA would suggest that there are preferable regulatory routes to see installation of these measures. As such, the SEA does not consider that the deemed scores mechanism should include reference to heating controls; rather, regulation should require these as essential. The SEA is having extensive discussions with the appropriate arms of Government to implement these regulations.</p>
<p>Question 9:</p> <p>Q9. Do you agree with the deemed scores produced? If</p>	<p>Calculating an approximately correct U-value is a reasonable simple process. It should be undertaken by a competent person (e.g. qualified via the BBA/TIMSA U-value and condensation risk competency scheme).</p>

<p>not please clarify which particular score(s) that you believe do not accurately reflect the savings for a measure.</p>	<p>Using only the thickness of insulation does not consider the varying performance of different products; performance (insulating wise) and thickness do not necessarily correlate exactly to one another.</p> <p>The methodology document associated with the consultation (section 2.4.1) gives various U-values associated with thicknesses of insulation, which are based on presumably a poorly performing insulant and the resulting post-installation U-values are very poor when you consider that around 60mm of a high-end insulating product as EWI on a poorer performing existing wall will get around 0.30W/m²K in reality (and with the new low lambda products, performance can better this with IWI).</p> <p>The deemed scores, post installation, are limited in scope. For example, you would think that there would be an option post installation for solid walls of 0.30W/m²K (<i>the target in L1B</i>), rather than just a jump in the deemed score options between 0.35W/m²K and 0.25W/m²K).</p> <p>Overall, the after / end, or post installation values appear to be lacking in aspiration for SWI and for a number of other construction types too (e.g. park homes). The building regulations approved documents set minimum performance levels for improvement works and many of the tables of deemed scores exceed these levels.</p>
<p>Question 10:</p> <p>Q10. Do you agree that it would be useful to also provide the deemed scores as lifetime savings (ie after applying all relevant multiplication factors), to make the relative value of each measure easier to identify?</p>	<p>The SEA welcomes simplicity wherever possible in the calculation of deemed scores, as long as sufficient effort was made to ensure the accuracy of deemed scores at an aggregated level.</p>
<p>Question 11:</p> <p>Q11. Do you agree with the proposal to use 'percentage of property treated' to identify whether 100% of a score should be claimed? If not, please explain your reasoning.</p>	<p>The SEA consider that representing the percentage of the property treated proportionately toward the percentage of a score which can be claimed is sensible.</p>
<p>Question 12:</p> <p>Q12. Do you agree with our proposed approach for applying for a new score from April 2017? If not please explain your reasoning, which specific parts of the process you do not agree with and</p>	<p>No comment:</p>

inform us of your preferred approach.	
<p>Question 13:</p> <p>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? If not, please provide reasoning and an alternate approach.</p>	<p>The SEA note that a case-by-case basis may increase administrative costs. Ensuring applications are 'spot checked' or evaluated in an aggregate manner may see the implementation and installation of ECO measures in a more efficient manner.</p>