

# 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:	Walter N. French
Completed By:	Walter N. French
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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.

I was concerned that Ofgem had not adhered to its own selection of Key variables as detailed in para 2.2 and 2.5 in the production of 20 sets of tables for SWI based on 5 different age bands of houses which is specifically against what was included in Para 2.5.

## 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.

Agree with the question but some house types are not catered for in a fair way.

I would suggest that Bungalows require a 4 bed and 5 bed archetype similar to Houses.  
Many bungalows have 4,5 or more bedrooms.

In addition a very popular type of property in Scotland is the Four-in-a block maisonettes, these are to be given the same score as Flats despite having no internal heatloss walls and having 3 external walls. Typical current CWI scores are ~ 32 Tonnes for Gas Heated house and under the proposed system is 5.4 tonnes.

#### 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.

I have concerns re the different approaches for deemed scores for insulating walls.

For CWI you have adopted only a single deemed score based on an weighted average of 3 age bands.

For SWI you have despite your methodology statements in section 2, primarily para 2.2 and para 2.5 gone for 5 age bands. This is despite the volumes for CWI to SWI in ECO being 655,000 CWI to 116,000 SWI (as at end March 2016). It is likely that this ratio will continue into the extension of ECO2.

It leads to the ridiculous situation that a 3 bed semi house pre 76 CWI property if treated by 50mm ext or int SWI receives a 35% higher score than the standard CWI score even though BRE show the final U value is lower.

The solution is to treat all wall insulation in a similar manner, either reduce SWI to a weighted average for each insulation thickness, – saving 16 sets of tables, or use the 3 age bands that were used to produce the CWI weighted average which would add 4 sets of tables. My preference would be to add the 4 sets of tables for CWI having age bands pre 76, 76-83 and post 83. This would minimize any potential gaming by sales agencies.

**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.

Re my answer to Question 6 it would be of benefit to extend CWI from a single weighted average to 3 age bands pre 76, 76 to 83 and post 83.

Room in Roof(RIR) – is a new measure for ECO not having been a measure in previous CERT, Warm Front or HEES schemes. In ECO only 15,000 jobs installed, - end of March 2016, compared to 440,000 Loft Insulation jobs. RIR like loft insulation if built before 1976 did not have any insulation added however unlike loft insulation where millions of upgrades have been done from EESoP1 to CERT and now ECO as well as Warm Front, HEES and LA & Housing Association schemes and a thriving DIY sector only 15,000 have been upgraded. To treat it for deemed scores as the same Average starting U value as Loft Insulation is a nonsense. The reason given by BRE “there being no other known information on which to base the latter” is a complete cop out.

I would propose 3 age bands – pre 76, 76-83 and post 83.

The way they are combined in the Deemed Score tables when residual loft area needs insulating is incorrect as both measures have different in use factors.

Having 3 tables for RIR replacing the two present tables would be simple to organize. Keep the residual loft separate by using the loft table plus the 50% standard area calculation.

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

## 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.

Cavity Wall Insulation & Room in Roof – see my answers to Q6 and Q7

**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.

**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.