

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:	Alliance of Energy Assessor Associations
Completed By:	Chris Holmes
Contact Details:	mail@cheltenhamhomeinspection.co.uk

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.

As the scores are the means of calculating funding our belief is that base data needs to be “actuals” and not broad statistically base averages

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.

The actual size (volume) of a property and the heat loss perimeter are features that can vary considerable within property archetypes and therefore the proposed method is certain to result in incorrect scoring in many cases, particularly for older and rural or deprived area properties

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 efficiency and running costs of each heating type are unique and specific thus need to be recorded as what they are. Bottled propane is considerably more expensive than bulk, hence inefficient, and therefore recording as bulk will introduce an error.

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.

Heat pumps and Bio Mass systems should be recorded as such and not "lost" by recording as mains gas

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.

The RdSAP EPC is a proven energy rating methodology with all data recorded on a single database clearly differentiating between measure types

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.

No

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

Has a test sample comparison exercise been carried out comparing ECO scores calculated using Deemed Scores and also for the same property using EPC methodology?

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 Deemed Scores whilst based on a great deal of data and a methodology created by BRE are in our view far too "dumbed down" to be accurate enough for use as means to calculate ECO monies to be paid out and the process is wide open to abuse and fraud.

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

This simply provides a “target” for those with a vested financial interest to create fraudulent scores.

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.

Again we have concerns that rather than recording factual property specific data the score result will be based on “typical” data for an archetype.

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.

1.2 By simplifying the process Deemed Scores open the doors to manipulation of data by parties with a vested financial interest in maximizing the score

1.4 There is no mention of any training or qualifications for those collecting data and/or calculating the Deemed Scores

2.1 By rationalization and introducing choice this opens the door to data manipulation

2.2 Correct identification requires a degree of training and thus skill for accurate recording to be possible

2.4 Assuming the entire property has been treated and then adjusting back again opens the door to data manipulation

2.5 Whilst we accept that considerable investigation and check have been made by BRE in establishing this again it gives choices and opens up to data manipulation

3.2 Property dimension errors in EPCs must surely be minimal and to apply typical archetypes for Deemed Scores must surely in reality make the dimensions of the majority of properties inaccurate thus in turn making the score incorrect

3.3 By deliberately selecting an “incorrect” archetype the data collector can manipulate the score.

3.4 Again concerns over not using actual property dimensions

4.4 Correctly identifying the primary heating source using RdSAP conventions requires training and a level of skill

4.5 Table 1 Bottled Propane is considerably more expensive than bulk LPG and recording as Bulk makes the property appear more energy efficient than it really is

Wood Central heating can be a log burner with a back boiler or wood pellets or sealed waste timber burner all with varying efficiencies therefore merging all into one Solid category for score calculation introduced inaccuracies.

A Heat Pump is what is says and should not be recorded as Mains Gas especially as in many cases the property will be Off Grid, hence why a heat pump has been installed

4.6 Is this really a practical approach and how will advice be standardized?

4.7 If the existing heating has been removed how can this be recorded when it is not known, what evidence will an auditor look for?

5.12 Again the possibility of score manipulation is introduced by giving choices to data collectors

5.14 Selecting No Controls when one of 3 is missing cannot be accurate, even if there are adjustments made within the software to adjust the score. What about Zoned heating

6.2 SAP was “dumbed down” to produce RdSAP as a more simplistic and cost effective tool for energy assessment ratings and has been made more and more accurate with each revision. We view Deemed Scores as a “Dumbing Down” of RdSAP driven by big business desire to have a simplistic (lower cost) process that is less regulated (lower cost) and largely in house (easier to manipulate)

9.1 & 9.2 Checking key measure and property characteristics will be difficult as the data collectors will be able to record selected information and also ignore data to improve scores and no internal head office monitoring visits is going to reveal this.

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

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.

The proposal to make the retrograde move over to Deemed Scores appears to remove the DEA profession from the process as fewer skills are required of the data collectors.

For accurate ECO scoring what is required is a "Before" EPC and an "After" which will the clearly, and accurately record a baseline and the improvement in energy efficiency and carbon savings using an established and proven methodology.

- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

