

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:	A & M Energy Solutions Ltd
Completed By:	Ian Mollard
Contact Details:	ian.mollard@am-energy.com 07740 444660

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.

A & M are happy with the key variables used.

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.

Yes in principle.

There is no archetype scoring for a 4 bed detached bungalow on the scoring spreadsheet there are a lot of these house types and so this should be added to the property archetypes.

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.

Some may need to be added or perhaps a more detailed list that would cover more types to avoid future queries

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.

There may be some additional specific heating types that may need additional clarification and or additional tables in support of the detail set out in the consultation.

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.

A & M agree.

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.

Yes A & M agree

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.

Yes, A & M feel that loft insulation should have more and or further differentiation, for example virgin lofts and those loft that have existing insulation. A & M feel that there should be a minimum of two

differentiations/starting depths. Otherwise you could potentially make virgin loft an unviable measure to install, and so carbon scoring should be reflective of this. There is currently enough information gathered to provide enough evidence to support virgin lofts as a differentiation from a top up.

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

Yes

What would be the maximum starting depth of loft insulation in mm that could warrant a top up under the deemed scoring. What is expected to be the minimum finishing depth of any loft install in mm installed under the ECO Extension.

Further guidance and or a more update RIR specification/QA framework for the ECO Extension period.

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.

Although A & M believe that the starting U value for RIR is not reflective of the current RdSAP 2.3 data. These measures when installed tend to have no existing insulation present. So either change the starting U value or have the differentiation of existing and none existing.

The finishing U value for loft insulation is not reflective of the overall finishing depth when either a virgin and or topped up loft is insulated. The U value should be lower to reflect the overall depth of loft insulation installed plus any existing; this in turn would increase the amount of carbon savings if the finishing U value is corrected.

Clarity on the minimum thickness of loft insulation when installed as a virgin and or top up. What the minimum finishing depth has to be.

The starting and finishing U values for Party Wall Insulation do not seem to be in line with the product detail and thermal values.

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 A & M think that this is a logical process.

Providing of course it is applicable to areas that can be insulated due to the construction. Areas that cannot be insulated due to construction of the Cavity Wall for example would not count as a % of the property that could have been treated.

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.

Yes A & M agrees.

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

A & M agree that a DEA is not really required, and the process becomes more de-risked especially around carbon substantiation. This should help with less detailing required on compliance overall

We would also ask for additional clarity on when you expect the specific score monitoring question via a consultation will be.