



ECO2 consultation: Deemed scores

Submission from the Chartered Institution of Building Services Engineers

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About the Chartered Institution of Building Services Engineers (CIBSE)

CIBSE is the primary professional body and learned society for those who design, install, operate and maintain the energy using systems, both mechanical and electrical, which are used in buildings. Our members therefore have a pervasive involvement in the use of energy in all types of buildings the UK. Our focus is on adopting a co-ordinated approach at all stages of the life cycle of buildings, including conception, briefing, design, procurement, construction, operation, maintenance and ultimate disposal.

CIBSE is one of the leading global professional organisations for building performance related knowledge. The Institution and its members are the primary source of professional guidance for the building services sector on the design and installation of energy efficient building services systems to deliver healthy, comfortable and effective building performance.

Response

1. Releasing this consultation on deemed scores before the ECO: Help to Heat consultation appears to be counter-intuitive. The latter also consults on scoring of measures but in a broader context. A coherent approach to the reforms should be taken to ensure that the successor to ECO2 is fit for purpose, and that the scoring is appropriate to the adopted scheme.
2. The proposed scoring appears to be complex and there are questions around the availability of skills and expertise in the field to implement the scheme correctly. There are previous examples of complex approaches, such as heat metering for the RHI, leading to sub optimal outcomes and excessive compliance costs to industry.
3. We understand that calculating the impact of energy efficiency measures at a household level is, by its nature, a difficult process but making too many assumptions could lead to poor data and sub-optimal outcomes.
4. With the current revision of PAS2030 there may also be a need to review the proposed scoring in light of this.