

# 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:	Sustain Ltd
Completed By:	Henrietta Bird
Contact Details:	Henrietta.bird@sustain.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.

We do agree with the basic key variables for insulation measures and welcome the efforts to reduce complexity. However, we recognise some potential issues, we could benefit from more variables for heating measures for example. Currently boilers all have same 'starting point' in terms of fabric, this favours newer properties rather than older 'hard to heat' homes. We would suggest the introduction of other key variables, namely age and existing insulation levels in order to encourage insulation measures to be installed to older 'hard to treat' homes.

### 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.

We agree with developing typical property archetypes and appreciate the benefits of not having to measure properties, particularly in terms of DEA and TMA time and cost. However we foresee issues with correctly categorizing properties without clearer guidance. For example, properties with open plan kitchen/dining room/living room, if you can only consider a room a bedroom after accounting for a kitchen, dining room and living room then these properties could lose out based on the layout and the rooms not being separate. The size of a standard single bed would need to be provided as this does vary.

Also, we believe that the English Housing Survey being a sample study for the entire UK housing stock is not a clear representation of the fuel poverty housing stock. The ECO Help to Heat Impact Assessment suggests that the energy efficiency of Fuel Poor homes are distinctly different to the typical UK housing stock and therefore further property archetypes may be required to account for this (please refer to chart 1, P.9 of the Impact Assessment).

Our proposal would be to either:

1. Have a duplicate set for scores for fuel poor households, modelled by sample methods but using a fuel poor sample
2. Adjustment factor/uplift to scores for fuel poor households

#### 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.

The option of District/Communal heating is required as a heating system option, this is particularly important as insulation is a pre-requisite requirement for district heating connection/upgrade measures.

If mains gas was selected instead the score would not adequately reflect the improvement. This oversight of a District/Communal heating option is concerning and does not support heat networks agenda.

## 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.

We believe that additional loft and room in roof insulation measures or targets are required. The current scores for these measures assume a level of existing insulation. Where properties have no existing insulation they will now be unlikely to receive insulation measures because of the associated score. Properties with high levels of existing insulation that can be topped up at low cost will be targeted, ignoring those most in need (with no insulation at all) due to higher costs and no score recognition for this.

There is no mention of a maximum level of existing insulation, we would recommend that this is considered to avoid the potential of minimal tip ups to properties with high levels of existing insulation benefiting from generous scoring. Alternately there could be a minimum amount that you can top up a loft that has existing insulation, so that the installer always has to add 200mm for example.

We agree that district heating should not be included as a deemed score and continue to be calculated using Full SAP.

We would like to query whether partial fill measures are included within the CWI deemed scores?

**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.

We agree with the principles and to an extent the differentiations made but note that there appears to be a bias towards solid wall insulation measures. For example, if you are installing SWI to a pre 1975 as built cavity walled property the wall U-Value is assumed to be 1.7W/m<sup>2</sup>k but if you are to install CWI to that same property the wall U-Value is assumed to be 1.435W/m<sup>2</sup>k.

There is also an age distinction for solid wall insulation measures but not cavity wall insulation measures. The BRE methodology states "This is consistent with latest research which shows wide variation in measured U-values for each age band." This quote brings into question why a wide variation is being treated with a single score.

**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.

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

We would benefit on further guidance regarding:

- Partial fill insulation, is this an eligible measure still and would you use the standard cavity wall insulation score.

- Number of bedrooms, we foresee issues with correctly categorizing properties without clearer guidance. For example, properties with open plan kitchen/dining room/living room, if you can only consider a room a bedroom after accounting for a kitchen, dining room and living room then these properties could lose out based on the layout and the rooms not being separate. The size of a standard single bed would need to be provided as this does vary.
- Multiple measures, would you need to state which measure came first and amend your deemed score starting point appropriately?

## 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.

A district heating system option needs to be available for insulation measures.

Virgin lofts will be overlooked unless a new measure or specific target is introduced.

Room in roof insulation is disadvantaged by the assumption that there is existing insulation present, as above this measure will be overlooked unless a new measure or specific target is introduced.

As explained in our answer to Question 2 we believe that the English Housing Survey being a sample study for the entire UK housing stock is not a clear representation of the fuel poverty housing stock. The ECO Help to Heat Impact Assessment suggests that the energy efficiency of Fuel Poor homes are distinctly different to the typical UK housing stock and therefore further property archetypes may be required to account for this (please refer to chart 1, P.9 of the Impact Assessment).

Our proposal would be to either:

1. Have a duplicate set for scores for fuel poor households, modelled by sample methods but using a fuel poor sample
2. Adjustment factor/uplift to scores for fuel poor households

**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.

We agree with the principle of removing complexity and therefore administrative cost

We want to ensure that the scores align with the government's strategy to help the fuel poor. We believe we have made recommendations and highlighted issues that need to be considered prior to implementation

We are shocked at the reported high level of assessors being struck off and suspended and therefore welcome the move to a simpler, more robust scoring mechanism. As we recognize EPCs were not designed to calculate absolute savings for energy efficiency measures.

**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.

We agree, we would like to understand further what evidence of inputs is required to be collected.