

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:	Acrobat Carbon Services
Completed By:	Andy Clixby
Contact Details:	andy.clixby@acrobat.uk.com

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.

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 in principle however there are property types that have been omitted or not differentiated between.

E.g.

- Park Homes should not be classed as a detached bungalow unless constructed after the introduction of BS3632:1991 due to their poor levels of insulation.
- Flats. Not differentiating between the number of external walls that a flat has would be the same as not differentiating between a mid-terrace house and a detached one.

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.

Agree in principle however I believe that there should be the additional measure types.

- Loft measures should be split in to '<60mm existing or Virgin' and '>60mm existing or Top-up' (see Q7).
- Room-in-roof as a stand-alone measure rather than combined with loft insulation (see Q7).
- Stone walls with non-consistent cavity insulation using polyurethane foam (see Q7).

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.

Agree in the main however some measures require further differentiation (see Q7).

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.

- I don't agree with BRE combining all existing loft insulation depths together to create one deemed score. As per 2.4.3 Figure 1 in their Methodology Report, the U-value used for the deemed score for all lofts is based upon the loft having 50mm of insulation however, the properties that should be targeted would have less than 50mm and therefore have a much higher starting U-value. According to Figure 2, BRE believe that there are approximately 1 million homes with less than 50mm of insulation in. Therefore there should be as in previous schemes (EEC/CERT/CESP), 2 separate measures '<60mm' and '>60mm' rather than just the one.
- I also don't agree with combining Room-in-roof insulation with loft insulation scores especially as the current proposed deemed score for loft insulation is so low. The properties that will be targeted are ones with no insulation in the 3 RiRi elements – flat ceiling, stud wall and sloping ceilings especially those built pre 1967 and the current deemed carbon score assumes that there is 50mm in all elements. This is quite clearly not representative of the actual condition of the housing archetype that could benefit from this measure.
- Although the different thermal qualities of cavity insulation has been recognised for fibre/white bead and coated bead, there is no mention of polyurethane foam (PUF) which has a substantially better lambda value contributing to improved thermal performance especially in

walls with cavities of an inconsistent/random nature i.e. natural stone.

- The assumption that all Park Homes are constructed to the levels suggested in BS3632:1991 is flawed. There should be a separation between those constructed before and after this standard was introduced as those constructed before 1991 would have woefully inadequate levels of insulation, would benefit from the actual constructional upgrade and increase the lifespan of the Park Home.

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

The industry needs to know what type of evidence will be required to support deemed scores.

E.g.

Boiler controls. Deemed scores assumes that unless a central heating system has all 3 controls (programmer, room thermostat and TRVs), that there are none – how would the absence of a control be evidenced.

Loft insulation. What is the maximum existing insulation permitted for a loft measure to be judged as necessary? The current proposed deemed score would benefit installers targeting properties that require just the one layer of insulation rather than those with little or none in which would require two layers (between and cross-laid).

Solid wall insulation – What would be required to prove the age of the building?

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 I completely agree with the concept of deemed carbon scores, I don't believe that the proposals made by BRE for cavity wall, loft and room-in-roof insulation measures are accurate based upon the information contained in their 'Ofgem Deemed Scores Methodology' report.

Cavity Wall Insulation

We agree with the figures in Table 7, however I believe that it is incorrect to combine the Uninsulated

U-value figures to create just the one average of 1.272 especially when one considers the findings of the very recent Ofgem U-value consultation.

It is recognised that suspected cavity wall insulation over-claims due to incorrect U-values is the reason that deemed carbon scores are being proposed, but I feel that the newly introduced threshold U-values more accurately reflect the construction of a wall rather than just the one especially as (according to Table 7) almost $\frac{3}{4}$ of properties with an uninsulated cavity wall were built prior to 1976 and would therefore have a higher starting U-value and greater carbon savings.

As in the earlier EEC schemes, there could be 2 options – pre 1982 and post 1982.

Loft Insulation/Room-in-roof insulation

As per my response to Q7, it is incorrect to assume that all existing loft depths are at least 50mm/have a starting U-value of 0.696. The properties that need insulating are those with less than 50mm (as per 2.4.3 Figure 1 in BRE's Methodology report) so (e.g.) a gas heated 1930's 3 bed semi-detached house with 0mm of existing insulation (U-value 2.3) would have a deemed carbon score of only 6.111 tCO₂. Currently, this measure would attract approximately 25-30tCO₂. A similar house with a room roof rather than a loft, would attract the same amount of funding despite RdSAP correctly assuming that there would be no insulation present.

The energy efficiency industry has shrunk dramatically since the end of CERT/CESP due to the stop/start nature of ECO, inconsistent funding levels and over-complicated compliance although funding levels should increase to cover the cost of the works (especially in fuel poor households), until an announcement is made, many of our supply chain are assuming that future rates will match the current ones and are considering installing non-ECO works or leaving the industry completely.

We recognise that some unscrupulous companies have taken advantage of over-inflated carbon scores gained from incorrect EPCs and welcome the prospect of deemed scores, the findings of the Bonfield report and the introduction of CASS for cavity insulation assessors but for some, this may be a step too far.

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

If not, please clarify why you do not agree and provide an alternative approach with your reasoning.

Other industry experts (manufacturers, system designers) should be permitted to propose new scores as the suppliers may not be as enthusiastic as those that have developed the new technology/process.

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.

It has become apparent that an assessor having a DEA accreditation is not always a reflection of competency. Creating a bespoke carbon score for a particular property by completing an EPC should be more accurate, however we believe that some scores have been calculated incorrectly due to wrong assumptions or misidentification of building/heating elements (deliberate or otherwise) by the DEA. We believe that it is far simpler to determine which deemed score is appropriate and can be identified (and subsequently verified at post-install technical monitoring stage) by anyone with common sense and a background in construction thereby reducing the overall cost of the measure by eliminating the need for a DEA.