

# 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:	ROCKWOOL Ltd
Completed By:	Kathryn James
Contact Details:	Kathryn.james@rockwool.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.

We are concerned that this methodology could lead to a number of serious adverse consequences in relation to building performance as follows:

- The over-simplification and indeed the deprecation of the retro-fitting process. The introduction of deemed scores and a 'fast-track' approach could result in the delivered thermal performance of buildings not meeting expectations, damage to the long-term structural integrity of buildings and adverse effects on the health and wellbeing of occupants.
- The proposed deemed scores approach is counter to best practice for retro-fitting energy efficiency measures. The retrofit design process must start with a good quality survey and assessment of each building, from which a good quality design is developed, suited to the type, condition and location of each building. The resulting design must take into account crucially important characteristics such as moisture/vapour performance, compatibility with the existing structure (and with other measures), fit-ability, detailing at interfaces and, ultimately, whole system suitability.
- The proposed deemed scores approach addresses each measure in isolation rather than collectively and so acts counter to the whole-house approach to retro-fitting energy efficiency measures. The importance of the whole-house approach is recognised by (notably) the DECC Every Home Matters/Bonfield Review as being essential to delivering high quality, long-lasting and effective energy efficiency measures to the UK's homes.
- Addressing each measure in isolation also discourages the widely accepted best practice of installing passive energy saving measures such as insulation, before reducing the remaining energy demands by the use of low and zero carbon technology, more efficient boilers etc.
- Assigning deemed scores that are principally directed by the thermal conductivity of the insulation material could create a bias towards certain retro-fit energy efficiency measures, which may not be well-suited to the property. Building design will of course take thermal conductivity into account but as one small aspect of overall building performance, as described above.
- The proposed deemed scores approach does not adequately take into account the existing performance of the building. This could lead to carbon savings being inaccurately estimated and to measures being installed which are not appropriate for the building.
- It is understood that the scoring bands are provided as a device to derive deemed scores rather than to

reflect actual, delivered performance but nonetheless it is confusing and seemingly at odds with established system performance to allocate a 0.35W/m<sup>2</sup>K U-value scoring band to 100mm thick solid wall insulation. Moreover, retrofit solid wall insulation providing a U-value of 0.35 would not comply with Building Regulations. The assigned U-value for 100mm SWI should therefore be 0.3W/m<sup>2</sup>K, commonly used 100mm thick SWI systems will typically provide a U-value of between 0.25-0.3W/m<sup>2</sup>K.

- The scoring for electric heating is considerably too high and should be reduced in line with DECC's published projections to avoid measures being installed which actually increase carbon emissions. The value for electricity in the consultation document is based on the carbon emission factors from SAP 2012, since when there has been (and continues to be) significant grid decarbonisation.

### 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 disagree with using typical property archetypes in this way for the reasons detailed in our answer to Q1.

### 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.

**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.

As detailed in our response to Q1, we disagree in principle with the proposal to facilitate the assessment of property performance based on arbitrary bands of property and measure type.

**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?

No.

## 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.

We question the principle of the proposed deemed score approach as much as the deemed scores themselves. It is our belief that any competent and responsible designer or installer will need to ensure that a proper and thorough survey and assessment of the property is carried out prior to the commencement of any work. The level of detail needed as part of this survey would be more than sufficient to prepare an accurate carbon score, thus negating any value of deemed scores to trustworthy providers.

**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



## 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 do not agree with the proposal in its entirety as it removes the need for an EPC, which we believe should be a requirement following completion of the retrofit works. Without an EPC, it is not possible to gauge the success of the ECO programme itself or its contribution to supporting government fuel poverty targets such as improving as many homes as "reasonably practical" to an EPC rating of E or above by 2020. Additionally, EPCs are important in raising consumer awareness and encouraging households to carry out further improvements, either alongside the ECO-funded measures or at a later date.
- We believe that the proposed light-touch method of assessing buildings is counter to the approach advocated by the DECC Every Home Matters/Bonfield Review teams and wide sections of the energy efficiency industry. More not less thorough building assessments are needed to ensure the delivery of high quality, long-lasting and energy efficient homes. More thorough building assessments are also needed to ensure that the delivered thermal performance of buildings meets expectations, long-term structural damage is avoided and a healthy and comfortable indoor climate is assured.