

Ofgem ECO3 deemed scores consultation response

Consultation question responses

1. No – the assumption all walls, pre-installation, are at starting U-value of 1.7 W/m²K or lower, fails to recognise the many non-traditional builds still in use today. Additionally, these are disproportionately occupied by the eligible fuel poor. Either a more detailed analysis of wall types b and c should be carried out or their starting U-value continued to be recognised at 2.1 W/m²K.
2. Yes
3. No – the introduction of average treatable areas will discourage maximum treatments possible which is required under the PAS guidance. Installers may be tempted to use the residents option to decline elements of treatment as a way of installing a less than optimal percentage of the property.
4. No – there is a greater amount of data already available from previous reported measures to Ofgem. Ofgem may need to request elements of this from suppliers but this would be easily obtained and represent a much greater and more relevant sample data set. Additionally, using historic reported data would also ensure the data set reflects Scottish property types as well.
5. No – as answered for number 4
6. No – RIRI is vulnerable to major omissions where installers could be encouraged to avoid difficult elements of a project creating cold bridges and vulnerability for the property in the future. Park Homes should not be averaged as this immediately reduces the carbon entitlement where continuing to use a POPT data submission avoids this. Additionally, the suppliers have not agreed to allow installers to cease to provide POPT data to verify the work completed so there will be no true saving of administration either.
7. No – it is relatively easy to create a POPT calculation for areas such as windows and doors where 100% is all windows at the property etc. Any element of the property envelope should be considered.
8. No – as already stated using a $\geq 67\%$ rule will infer that a 68% install is 'enough' for compliance and again, as already stated in response 3, this could lead to cold bridges and issues with moisture damage in the future.
9. No – properties with large extensions, such as older stone built rural properties, often have subsequently been extended at the turn of the century with the additions of internal bathrooms and toilets. If the extension is also in solid wall but of a different substrate, these large extensions will fall outside these new proposed categories disadvantaging the occupants who could be eligible fuel poor.
10. Yes – though the boiler multiplier at 400% defeats the BEIS intention of driving insulation measures over heating measures.
11. Yes
12. No – Your table that reaches the final average value of 1.14 should be reset excluding properties built after 2006 as these would be built to current specification in the first place. Data from this recent period is skewing the averages.
13. Yes
14. No view or knowledge
15. No – the park home market can be looked at in two halves; the pre- and post '85. The 'park homes' measure caters for the newer homes and the 'park homes 2' the earlier. The proposals here regarding 'park homes' are not recognising the fact installations are achieving outcomes values of 0.3 already so the standardisation at

0.65 will simply reduce the incentive to install. Similarly, the starting rate at 1.2 is also devaluing the current higher true rates. Finally, the proposal to remove the measure 'park homes 2' completely, takes no account of the need to recognise the much colder older homes. There has always been pressure on home owners to exchange old home for new on sites as the site owner is generally commissioned on each sale. This does not consider the great number of financially and fuel poor residents who are in no position to make such a large purchase. These changes combined with the POPT proposal at 80% will all but finish the park home insulation market where it is known there are c.400k units lived in in the UK.

16.

- a. The intention to reduce administration is flawed, feedback from installers and suppliers together at the open day made it clear administration would not be being reduced. Potentially less information will be passed back to Ofgem but it will still be gathered. Specifically, the proposed simplification of POPT, if adopted, will have a negative effect as claims on a great number of properties will be reduced by the impact of the averaging of rates. This in the round will mean less properties are treated and more residents, who are eligible fuel poor, will go un-assisted. This is contrary to the objective of the policy.
- b. The assumptions being proposed are narrowing the fit of structure types and dumbing down the assumed energy improvement achieved by the installation of each measure. This will potentially create a higher number of total measures for the allotted budget but it will not mean the most appropriate properties and treated with the most appropriate measures. It would appear the proposed approach has been suggested without true consideration of the need for more insulation on the millions of cold solid wall properties we have in the UK.

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