# Energy Company Obligation (ECO)
# Deemed Scores Consultation Questions

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Making a positive difference for energy consumers

**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: | Bracknell Forest Council |
| Completed By: | Hazel Hill |
| Contact Details: | Hazel.hill@bracknell-forest.gov.uk tel 01344352536 |

## 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.

It is suggested there are three factors to explain the variations- property size and type,

I would suggest age is another variable that needs to be in this group as a property built in 1920 will be different in size to that of 1960 and today's size. 1900 and 2007 differ significantly on C02 emissions and ECF/sq metre.

I agree with all other aspects in relation to heating and measures installed.
And if age is included move this up to agree.

Flats are different according to their position and number of outside walls. We have detached flats whilst some also only have one outside wall. Some have flat roofs, whilst others are well insulated. Some flats are ground floor whilst other have an undercroft and therefore exposed to cold air, reflecting in a lower value.

Greater clarification needed over chalet bungalows and town houses and clearer "room in roof" guidelines.

My reasoning is based on over 38,000 records of RDSAP calculations currently held in the borough and 16 years experience.

## 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.

I agree that measurements could be removed saving time and possibly reducing errors, however age of the property gives a better guide to size. I agree regarding no. of bedrooms and additional notes.

I disagree with the aspect of suggesting a bedsit becomes a one bed flat which potentially increases the floor are two fold and therefore would give a misleading SAP value.

I also disagree with park homes, we have completed extensive work in this area with some extra large units 96 square metres; and construction type is timber with above unheated space; loft works often not possible due to low pitch/ accessibility issues. Park Homes need to be regarded quite different from bricks and mortar. Using B.S.3632;1981 standard may not reflect the true value. Many of our park homes are much older combined with the fact that manufactures U values are overestimated giving a double or triple error when size is considered. This can distort cash and carbon savings incorrectly.

These occupiers have higher costs has often their energy is sub metered from the park site. In addition these are often bottles propane gas, resulting in the worst properties with the worst construction type and worst heating fuel.

## 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.
High Heat Retention Radiators or where they should be listed under

## 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.

The wall types do not include System build (wimpey no fines with and without external wall insulation)

5.6 mentions characteristics of the property which states age, yet this is not part of the variations as outlined in the methodology.(2.2)

5.13 In the case of gas heating an full set of controls would need to be installed to meet the building requirements.

Deemed scores for park homes construction, and with various depths of external wall insulation.

Underfloor insulation to park homes or flats with undercroft areas.

**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.

| |
|---|
| **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? |
| I disagree with the statement a full set of heating controls to be a timer, a room thermostat and TRV's.<br><br>The majority of homes I visit still have older Pre condensing boiler switch basics controls (no TRV and limited programming facilities. |

## 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.

**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.

Some times because of extension to property only 50 % may be cavity wall insulated, /as this represents 50% of the property, the rest being Solid construction.

## 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.

The sooner the better

**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

Some specific properties e.g. listed properties could have some works done to improve but may be more limited as to what works could be done. External cannot be done but internal would be an option in some part of the dwelling.

## 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.

Although the must be some form of quality control check to ensure fraudulent claims are not made.