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:	Abba Energy Ltd
Completed By:	Julian Williams
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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.

I completely and thoroughly disagree with the starting principle of using ludicrously simplistic data as substitutes for accuracy. Use of the basic 'ECO' approach is fundamentally flawed in that it is appallingly inaccurate in the first place.

EITHER current SAP methodology must be used (and improved) OR a more accurate system such as EnerPhit must be used/adapted for use. There are numerous aspects of the proposed methodology which fly in the face of common sense; 'improving' Hot Water Cylinder insulation by simply adding 80mm insulation – how is this done? Spray on site? Add a jacket which just happens to fit perfectly? What if the HWC has no insulation? How do you 'add' 100mm? what if you can only add 80mm or there is only room to add 40mm? One more example – what on earth has the number of bedrooms to do with the total internal floor area? Any hope of accuracy using this is absolutely lost.

Now that we know that global warming is going to negatively impact future generations, we must act responsibly, which does not include only being tight and accurate with spending, it also includes being tight and accurate with carbon dioxide emissions and for energy efficiency in buildings this must start with accurate input data. Key Variables are guesstimates by comparison with SAP and Enerphit and their use will take the UK backwards in terms of CO2 emissions, costing the country more in spending and more in environmental impact.

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 fundamentally disagree with the removal of any measurements at all. If you cannot measure something then you cannot know how it has changed through any action you impart upon it. This is so basic that it defies belief that anyone working towards 'improved energy efficiency' would ever propose the removal of 'measurement'. The alternative is to MEASURE. The alternative to the ECO energy assessment is to either use and continue to improve SAP or move to EnerPhit or an adapted version of EnerPhit. The equivalent of 'property archetypes' is 'estimated energy bills', something which we are supposed to be moving away from.

It is already bad enough that 40% of Green Deal Assessments had only one suggestion for energy improvements within the entire building, but if you insist upon dumbing down the approach to energy efficiency advice even further then guess what? – the results are going to be even worse.

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.

I strongly disagree because the proposal to use fewer primary heating sources with less accurate heating controls than SAP2012 is a regressive move in itself. The preferred approach is, of course, to take this country's environmental responsibilities seriously, build upon the breadth and depth of energy efficiency expertise available and improve upon existing standards by either upgrading SAP or by using and adapting EnerPhit.

Entertaining the idea of 'deemed scores' is a waste of time. Actually using them would be environmentally irresponsible.

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 number of heating systems which need to be accounted for is the same as that in SAP 2012, but also including more types of CHP and fireplace.

Furthermore, basing 'savings' upon the assumption that 'all heating controls stated in Table 23 are present' is ridiculous, because if the assumption is wrong, the so will the 'savings' be wrong. To formulate a proper energy strategy for a home, or a building, or a street, or a neighbourhood, or a county, or a region, or a country, you must MEASURE things to start with and then MEASURE them to show what impact your improvements had.

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.

Of course they do not. Anyone with any understanding whatsoever of building physics can easily see that the proposed 'measure types' will help to remove us as far away from a good, genuine and national energy efficiency strategy as almost anything else one could imagine. The measure types are oversimplified and lack accuracy.

The idea of generalizing measure types is ridiculous, like saying 'got a headache, take an aspirin' without asking whether the person is allergic to aspirin, or already took an aspirin, or even considering whether aspirin is appropriate in this case.

Additional 'measure types' to be installed will be those which have different dimensions to the 'assumed' measure type guidelines, requiring a completely different approach to that proposed in order to impart a measurable and positive impact. With only 'estimated' measures and 'improvements' one cannot even guarantee to provide proven measured improvements, which means that you can make no factual claims about positive environmental change at all.

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.

What is the point in differentiating between several inaccuracies? Differentiation must be applied to all properties, except where they have been proven to be identical in energy efficiency terms through drawings/ measurement and proper auditing of on-site installed fabric and services. Anything else is short-changing the current and future residents.

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.

All of them! You are making a grave mistake by not measuring the property in the first place. Within properties in just one row of terrace houses there is opportunity for wide variation, yet individual home-owners expect installed energy efficiency measures to meet their needs in a manner which will demonstrably improve the efficiency of their home. You cannot hope to prove that you have done this without measuring up first, and taking accurate account of exactly what has already been built, installed and changed. Anyone who thinks they can is fooling only themselves. Anyone who thinks that this is an environmentally responsible approach is being dishonest. It is time to DRT – Do the Right Thing, for the future generations – and stop only thinking of the short term.

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

Only one – that would be guidance that states 'for the sake of reducing global warming and our future generations, never use deemed scores'.
They are quite clearly part of a dangerously inaccurate approach to any country's energy efficiency strategy.

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.

Strongly disagree. None of the deemed scores are in any way 'fit for purpose' because the input data is completely inaccurate for an individual property. At least SAP uses measurements from drawings and site, so that some degree of accuracy is involved. The proposals involve using guesstimates (for savings) on top of estimates (poor/zero property measurements), so how can anyone claim any 'savings' whatsoever? This is like going back to estimated energy bills.

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.

Again, such a proposal is completely inaccurate, at a time when we need to be MORE sure of the impact of our actions upon the environment, and not LESS sure.

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.

Strongly disagree – why on earth is the current 'relatively accurate' SAP system being dumped in favour of something which will so very clearly 'dumb down' the UK's approach to energy efficiency strategic thinking? If you don't like SAP then improve it, because there is an existing network of energy consultants who work hard to give good accurate advice to builders and home-owners. Who is going to be the energy consultant instead? The builder (with no specialist energy training), whose interest is merely the 'quickest and most profitable for me' thing to do? The overworked Building Control Officer (with no specialist energy training)? The 'in your pocket' Approved Inspector (with no specialist energy training)?

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.

What, you mean have absolutely no-one trained on energy efficiency at all to QA this? Are you insane?

This would be an open door invitation to fraud on a massive scale. The input data could be twisted to fit any story whatsoever. And if it can be, it WILL be.