Energy Company Obligation (ECO)
Deemed Scores Consultation Questions

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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:	Broadstone Properties Ltd.
Completed By:	Gary Smith (Director)
Contact Details:	gary-s@carbon-house.com / 07931 566266

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

I disagree with deemed scores being used for any process they will not give an accurate calculation.

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 strongly disagree with the proposed method, the carbon scores generated from the matrix will not be accurate. The current RdSAP facility that is in place should continue as this is fair and accurate.

The new proposal goes against previous government guidance, millions have been invested in the training of DEA assessors and many have worked very hard to achieve the required qualifications and built a career around this. If the new proposal goes ahead all this will be meaningless and millions of pounds will have been wasted.

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.

Deemed scores of Mains gas will be nowhere near accurate the current RdSAP process should not be discontinued as this ensures accurate scores are calculated.

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.

I agree that you have, but I strongly disagree with deemed score process for the calculation.

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.

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.

N/A

Q8. Are there any areas where you could benefit from further guidance in using deemed scores?
Deemed scores should not be used in any instance, they are not producing accurate scores.

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.

All deemed scores will do for the Room In Roof industry is completely kill off the companies that install this measure and also the DEA assessors that worked hard for their qualification. I have looked at the matrix and the tonnage is drastically reduced and not an accurate reflection. The reduced scores will mean that companies will no longer be able to make this work resulting in job losses and closure. This will also have a knock on effect for the DEA assessors as they will no longer be required.

We have worked hard to build a company and invested a lot of money in EWI then the funding was pulled, we then moved onto IWI and the same happened resulting in job losses. We have now rebuilt our business and employed people for Room In Roof insulation and the same seems to be happening again which will mean for the third time our business will not survive if these changes go ahead.

It seems very unfair when people have worked hard to build a business up that this could all be pulled from under our feet destroying everything we have worked hard for.

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

I disagree with the Deemed Scores approach, this will be the end for installation companies and DEA's who have all worked hard to build their careers and businesses everyone has followed the required guidelines and now yet again it's looking like it's all going to change as it did with IWI and EWI.

The scores are significantly lower than the current scoring system meaning major job losses for this industry as companies will not be able to make this work based on the new matrix. This will also impact companies such as STROMA and utilities will struggle to hit their required targets.

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

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.

DEAs should continue to be used for accuracy.

- ○ Strongly Disagree
- ○ Don't Know