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:	Thermabead Ltd.
Completed By:	John Szymik (Managing Director)
Contact Details:	01905 342300

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.

Thermabead strongly agree with the key variables which are to be used as the main inputs.

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.

Thermabead strongly agree with the method used in developing the typical property archetypes.

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.

Thermabead strongly agree with this 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.

Thermabead strongly agree with this statement.

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.

Thermabead strongly agree with the above statement.

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.

Thermabead strongly agree with this statement, especially in differentiating the thermal conductivity for materials installed under cavity wall insulation.

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.

Yes, we feel that loft insulation should be further differentiated. Although we appreciate that determining the existing loft insulation can be in-accurate due to varying factors, the difference in carbon/cost savings between a loft with 50mm existing (which is the depth of insulation for BRE's before starting U-Value of 0.696) and for example a virgin loft can be great (U-Value of 2.0 +). Thermabead therefore feel that different thickness 'bands' should be made available for selection, as

opposed to the weighted average proposed by BRE.
Q8. Are there any areas where you could benefit from further guidance in using deemed scores?
Yes, we already manufacture and supply a product significantly more efficient than the recognised values within the deemed scores. On this basis we would be keen to make an application for a new score. Given that we already have this product and the supporting data you'd require, Thermabead would lilke to see some guidance on the application process to ensure that our product is accepted prior to the 1st April 2017 implementation date for deemed 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.

Thermabead agree with the deemed scores produced, however to analyse the data produced by the BRE to see how accurate the scores are would be time consuming, so we can only presume that they are in fact correct.

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.

Thermabead do agree with this statement, however Ofgem need to make it clear as to what the reasonable grounds are to not installing 100%.

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.

Thermabead agree with the above proposed 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.

Thermabead neither agree nor disagree with this statement. We agree because yes a DEA would technically not be required, as their qualifications and access to the RdSAP software would not be needed as the software in regards to ECO would become defunct. However we also disagree because a DEA has all the skills to be able to correctly survey the property which would lead to the deemed scores, and in producing an EPC it allows the customer to have physical evidence in front of them as to what the energy efficiency is like on their property.