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:	Isothane Limited
Completed By:	Anne Morgan-Davies
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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.

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.

The housing stock information does not take into consideration the variations across countries of Great Britain by using only the English Housing Survey 2013 and misses many "non-standard" housing types which have also been neglected by previous energy efficiency schemes.

Stone properties with cavities have been ignored despite being recognised under previous and current ECO schemes. Ofgem appropriate guarantees are in existence for stone properties with cavities and the current ECO scheme allows for u-values to be overwritten for properties

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.

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.

We have serious concerns over the cavity wall insulation deemed scores and the lack of differentiation and the subsequent impact this will have on the ability of many properties to receive funded insulation.

The figures do not take into consideration the range of cavity wall insulation products that are available which have improved levels of thermal conductivity and are suitable for non-standard housing and in areas of Great Britain which are not suitable for the fibre, bead and mineral wool insulation products.

The deemed scores also do not allow for differences in the age of properties which can make a significant difference to the starting and post install U-values of properties. The current Ofgem guidance around cavity wall u-values has age bands as far back as pre 1900 so clearly there is an awareness that these properties exist but yet they have been ignored/disregarded in this consultation.

The U-values provided in the Table 7 of the BRE report are based on brick properties and do not accurately reflect the differing property types across the country particularly stone properties. These properties which have been left untreated due to failings in previous energy efficiency schemes. ECO Appropriate Guarantees are in place for these properties under ECO1 and ECO2 so it appears strange

that they should not be included in the deemed scores.

The thermal conductivity values in the deemed score consultation available to choose from are 0.04 and 0.033 covering a range of values from 0.0420 to =< 0.033. The lower option of 0.033 greatly underestimates products which achieve 0.025 thermal conductivity, products such as polyurethane foam cavity wall insulation.

Polyurethane products, including Technitherm® have been tested by UKAS accredited testing houses such as the BBA. Technitherm®'s certificate 97/3426 has recently been re-issued and confirmed these thermal conductivity values. The BRE have also tested these products to show that they achieve these values in addition to their other features such as the ability to treat non-standard housing types including random stone cavities and properties in flood risk and wind driven rain affected areas. The thermal conductivity figures that are being ignored are not "claims" from manufacturers but figures checked and certified by reputable bodies.

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.

As per the details provided in Q6 we believe that it is necessary to differentiate further within the cavity wall insulation measure type to take into consideration the range of products available and the increased performance of some of these products. We also feel it is necessary to differentiate further on property construction as stone and brick have very different u-values.

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

We would benefit from knowing if deemed scores for stone properties with cavities do exist and what these are.

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.

As per our answers in Q6 we do not believe the deemed scores produced accurately reflect the property

construction and the accredited product performance that are available to be used to provide energy efficiency measures.

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.

In order to accurately reflect the area of the property treated where this is less than 100% the calculation requires the property to be measured and not just assumed that all elevations/areas around the house are equal.

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.

We agree in principle of the simplification of the process and the potential cost savings is welcomed but not at the expense of accurate scores and the over simplification of a system which ignores large sections of the housing stock of the country. These properties could benefit from energy efficiency measures and help energy suppliers to achieve carbon reduction but will not under the current recommendations.

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.