



Elmhurst Energy's response to:

ECO4 Scoring Consultation: Part 2

Prepared for: Ofgem



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Introduction

Elmhurst Energy are pleased that Ofgem are seeking a consultation on ECO4 Scoring Part 2 and as such we are delighted to respond to each question in turn. Where we consider that we have insufficient knowledge on the subject to add value we have responded "no strong opinion".

The consultation asked 19 questions and we have answered them all below. We hope you find the responses considered and useful.

Summary

In summary we consider that ECO4 is a great opportunity for energy assessors, retrofit assessors and retrofit coordinators but it will put the whole industry under a spotlight. As accreditation schemes we need to continue to work with Members, DLUHC, BEIS and OFGEM to review our processes and controls to ensure that energy assessments can be relied upon and any attempt to "game the system" be quickly identified and the perpetrators dealt with appropriately. That said Elmhurst is proud of the scheme that it runs and we are confident that, with the improvements that we have made in the last five years, we can deliver and look forward to the challenges ahead.

In particular we are very supportive of the following:

- The suggestion of a before & after RdSAP assessment and we would strongly suggest that this assessment should be in the form of an EPC
- In order to ensure accuracy of the post install EPC, the assessor should be passed all relevant documentary evidence to enable them to correctly model any improvements
- A final lodged EPC will ensure the homeowner is provided with an accurate up to date summary that reflects the improvements made to their property.

Questions and Answers

1. Do you agree with our proposed format for partial project and full project scores?

No strong opinion

2. Do you agree with our proposal to include fixed value uplifts into our scoring matrix and for fixed value uplifts to be notified as measures??

No strong opinion

3. Do you agree with our proposal to require a post-retrofit RdSAP assessment to determine a project's finishing SAP rating (option 1)?

Yes we agree a post retrofit RdSAP assessment should be completed and we strongly believe this assessment should be in the format of an EPC.

There are a number of reasons for this suggestion over any other format of RdSAP assessment type. It will offer the homeowner an indication of finished result, it is a published document on a public register with far greater transparency and less open to potential abuse. It would allow for greater understanding and reporting of CO2, energy & cost savings.

In addition it would allow for more accurate reporting to ensure the BEIS objective to improve as many fuel poor homes to Band C can be monitored. It would also allow a better understanding of the impact of the ECO 4 scheme.

4. Do you agree with separate measure and project notifications? If not, would you prefer a single notification?

No strong opinion

5. Do you agree with our proposal to award deflated PPS to the final measure in a project?

No strong opinion

6. Do you agree that in ECO4 we should continue to require supplier generated MRNs to for all measures?

No strong opinion

7. Do you agree with our proposals for determining the point of completion for the project? Can you suggest any alternatives to determine that a project has been completed?

We strongly agree that all projects should conclude with a post EPC, issued ideally the same assessor who was responsible for the pre-assessment. This EPC should then be supplied to TrustMark to confirm the projected has been completed and allow them to release a completion certificate.

In all instances we would recommend an EPC over any other RdSAP assessment type. It will offer the homeowner an indication of finished result, it is a published document on a public register with far greater transparency and less open to potential abuse. It would allow for greater understanding and reporting of CO₂, energy & cost savings.

In addition it would allow for more accurate reporting to ensure the BEIS objective to improve as many fuel poor homes to Band C can be monitored.

8. Do you agree with the assumptions used to develop the partial project scores?

No strong opinion

9. What are your views on our proposal to remove the wall type distinction for heating measures?

No strong opinion

10. Do you agree with our proposal to split the standard heating control measure into a programmer and room thermostat measure and a TRV measure?

No strong opinion

11. Do you have any suggestions on how heating control measure category could be further simplified?

No strong opinion

12. Do you agree with the proposed changes to the notification of rare heating systems?

No strong opinion

13. What are your views on our proposal to remove pre-main heat source for insulation measures?

No strong opinion

14. Do you agree that the number of u-value variants for solid wall insulation measures should be reduced?

We agree this seems a sensible approach. If a non-defaulted U value is to be entered into the RdSAP assessment, the calculation of how that U value was achieved will need to be completed by a suitably qualified & competent person and evidence of this passed to the assessor. This will ensure an accurate RdSAP assessment and provide accountability.

15. What are your views on our proposal to have a combined park home insulation measure?

No strong opinion

16. Do you agree with our proposal to retain the distinction between single and double park homes by creating a “PHI single” and “PHI double” measure?

No strong opinion

17. What are your views on the addition of partial project scores for pitched roof insulation, hybrid wall insulation and district heating system connection measures?

If this will require the RdSAP assessor to model any building part with a non-defaulted U value into the RdSAP assessment, the calculation of how that U value was achieved will need to be completed by a suitably qualified & competent person and evidence of this passed to the assessor. This will ensure an accurate RdSAP assessment and provide accountability.

18. Do you agree with the approach and assumptions used to derive the scores for the pitched roof insulation measure?

No strong opinion

19. Do you agree with the approach and assumptions used to derive the scores for the district heating system connection measure?

No strong opinion



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