

**Final**



# **Consultation Response**

**Energy Company Obligation  
scheme: SAP and RdSAP  
Amendments**

Prepared for: Department for Energy Security and Net Zero

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**Elmhurst Energy**  
16 St Johns Business Park,  
Lutterworth, Leicestershire, LE17 4HB  
01455 883 236



## Introduction

Elmhurst Energy are pleased that the Department for Energy Security and Net Zero are seeking a consultation on Energy Company Obligation schemes: Standard Assessment Procedure (SAP) and Reduced Data SAP (RdSAP) amendments and as such we are delighted to respond to each question in turn.

The consultation asked 11 questions and we have answered them all below. We hope you find the responses considered and useful for taking ECO4 and GBIS forward in a progressive manner.

Elmhurst Energy welcomes the opportunity to respond to this consultation and appreciate that the change of methodology needs careful consideration for any and all applications of RdSAP/SAP.

We strongly feel that running two methodologies concurrently is not an option (Option 1). It has never been done before and many of the unintended consequences may not even be known, to fully understand the impact. Elmhurst strongly suggest option 1 is removed completely.

From an initial review of the three options, Elmhurst Energy prefers option two; it is something we can commit to as the solution exists now and is also less of a risk to the rest of the industry that relies on RdSAP.

## Questions and Answers

**1. For ECO4 retrofits where a full SAP assessment is required, do you agree with the proposal to update legislation to require that, after a transition period, only SAP10.2 be used?**

Yes, we support the requirement to update the legislation in line with the proposed transition period, and only allow SAP10.2 to be used after this time.

**2. Do you agree with a six-month transitional period from the date the amended legislation comes into force, during which either SAP2012 or SAP10.2 can be used for ECO4 retrofits that require a full SAP assessment? If not, please provide details of alternative transition arrangements.**

Yes, we support the 6 month transition period, after which only SAP 10.2 will be used. The time frame matches existing guidance we provided between pre and post project assessments and allows a reasonable time frame to complete work.

**3. Of the three options presented here for evidencing:**

**3.1. Which is your top preference and why?**

As an Accreditation/Certification Body, and having experience in this sector for over 30 years, we strongly feel that running two methodologies concurrently is not an option (Option 1). It has never been done before and many of the unintended consequences may not even be known to fully understand the impact. Elmhurst strongly suggest option 1 is removed completely.

A simple, clear process is needed to mitigate risk. As a result, we feel Option 2 is the most sensible proposal and will cause the least risk and impact on the industry.

### 3.2. Which is your second preference and why?

Following our concerns for Option 1 raised in question 3.1, we feel Option 3 is the more reasonable as an alternative to Option 2.

We do have concerns with Option 3 as well, regarding the completion of all outstanding projects on a set date may introduce complication however setting the date makes support and guidance very simple and clear to everyone. It is inevitable that a period of delay would occur with projects been held back for the implementation of the SAP10.2 methodology, as it would simply be impossible for the instillation and completion/lodgement of the project before the change date occurred.

### 4. For options 1 and 2, do you agree that 3 months following the introduction of RdSAP10.2 is sufficient to allow the completion of retrofits?

With ECO4, under consultation with TrustMark and the Accreditation/Certification bodies, Pre and Post assessments are given a 6 month window for work to be completed. We therefore suggest that for uniformity, and consistency in practise that this is retained here. We do however support a timeframe that is as short as possible to not delay the industry and processes both allowing for efficiency of implementation and reality of delivery.

### 5. Option 2 involves converting pre-retrofit SAP ratings from RdSAP2012 to RdSAP10. When this conversion takes place on the pre-retrofit SAP rating, there is a chance that some ECO4 retrofits may no longer meet the ECO4 minimum requirement (MR). What do you think the best approach would be to minimise this risk?

There needs to be an understanding in the industry that this risk exists, as RdSAP2012 and RdSAP10 will work on different fuel factors as well as other elements, and an allowance has to be made for the proposed transition period. Funding should be based on the pre-assessment at the time and not the post assessment, allowing the industry to be consistent with what is known, rather than try to implement something that is unknown until the RdSAP10 go live date.

**6. Are there further transition options available? Please provide details in response to this question.**

An alternative approach could involve obtaining an assumed post assessment prior to the RdSAP 10 go live date. We understand some of the industry implements this already to understand the impact on what the measures will do to the RdSAP result prior to installation. To help understanding the pre and post, it could be requested that a pre and post is obtained in both methodologies for the best collection of data and better compliance checking. We do not feel this adds much more value to option 2 however may already be active in the market as an existing process.

**7. Do you believe any of the options, when applied uniformly to ECO4 and the GB Insulation Scheme, will lead to unintended consequences? Please note any mitigating options in your response.**

It is important to understand the variations (if any) between SAP2012, and SAP10.2. If the data required has not been gathered, this will cause complications, and may require additional visits by the Retrofit Assessor. This cost will need to be accounted for in funding being available during the transition period.

As an Accreditation/Certification Body, and having experience in this sector for over 30 years, we strongly feel that running two methodologies concurrently is not an option (Option 1). It has never been done before and many of the unintended consequences may not even be known to fully understand the impact. Elmhurst strongly suggest option 1 is removed completely.

**8. Do you agree with our proposal that ECO4 projects that contain a District Heating Connection (DHC) can also be evidenced by a pre-retrofit full SAP assessment lodged as an EPC?**

As per Question 4 we have recommended changing the time frame to 6 months, rather than 3 months. This would mitigate the issues under this question.

We do not however see any concerns with allow the proposal to continue as noted.

**9. Do you agree with our proposal to not require Ofgem to update their scoring methodology for ECO4 following the change from SAP2012 to SAP10.2?**

No strong opinion.

**10. Do you agree with our proposal to not require Ofgem to update their scoring methodology for the GB Insulation Scheme following the change from SAP2012 to SAP10.2?**

No strong opinion

**11. Do you think that the RdSAP and SAP updates will impact scheme delivery, and if so, how? Please provide evidence to support your response.**

Regular updates to the methodology is important to ensure that assessments truly reflect the impact of new proven technologies and innovation, and the changes in power generation which impact on carbon emissions and fuel prices. Although we are generally supportive of the upcoming update, we believe that any future updates should come more frequently - a gap of 4 years since the last update is perhaps a stretch too far. Following this, we would recommend the terminology is considered in the policy and guidance to allow for less disruption for each RdSAP update when used in the schemes. A consistent approach should be agreed and that be adopted as the norm for all schemes.

It is apparent that the changes being introduced in RdSAP 10 will result in assessors needing to spend more time on site in order to carry out the appropriate data collection. With this in mind Elmhurst will be lobbying energy assessors and organisations to review their pricing structures, as the future domestic energy assessment will carry much more value due to the time taken to produce it and the additional data collected.

## Contact Details

Should you require any further clarification, please contact us at:



Elmhurst Energy  
16 St Johns Business Park,  
Lutterworth,  
Leicestershire,  
LE17 4HB



01455 883 250



[enquiries@elmhurstenergy.co.uk](mailto:enquiries@elmhurstenergy.co.uk)



[www.elmhurstenergy.co.uk](http://www.elmhurstenergy.co.uk)



elmhurst  
energy