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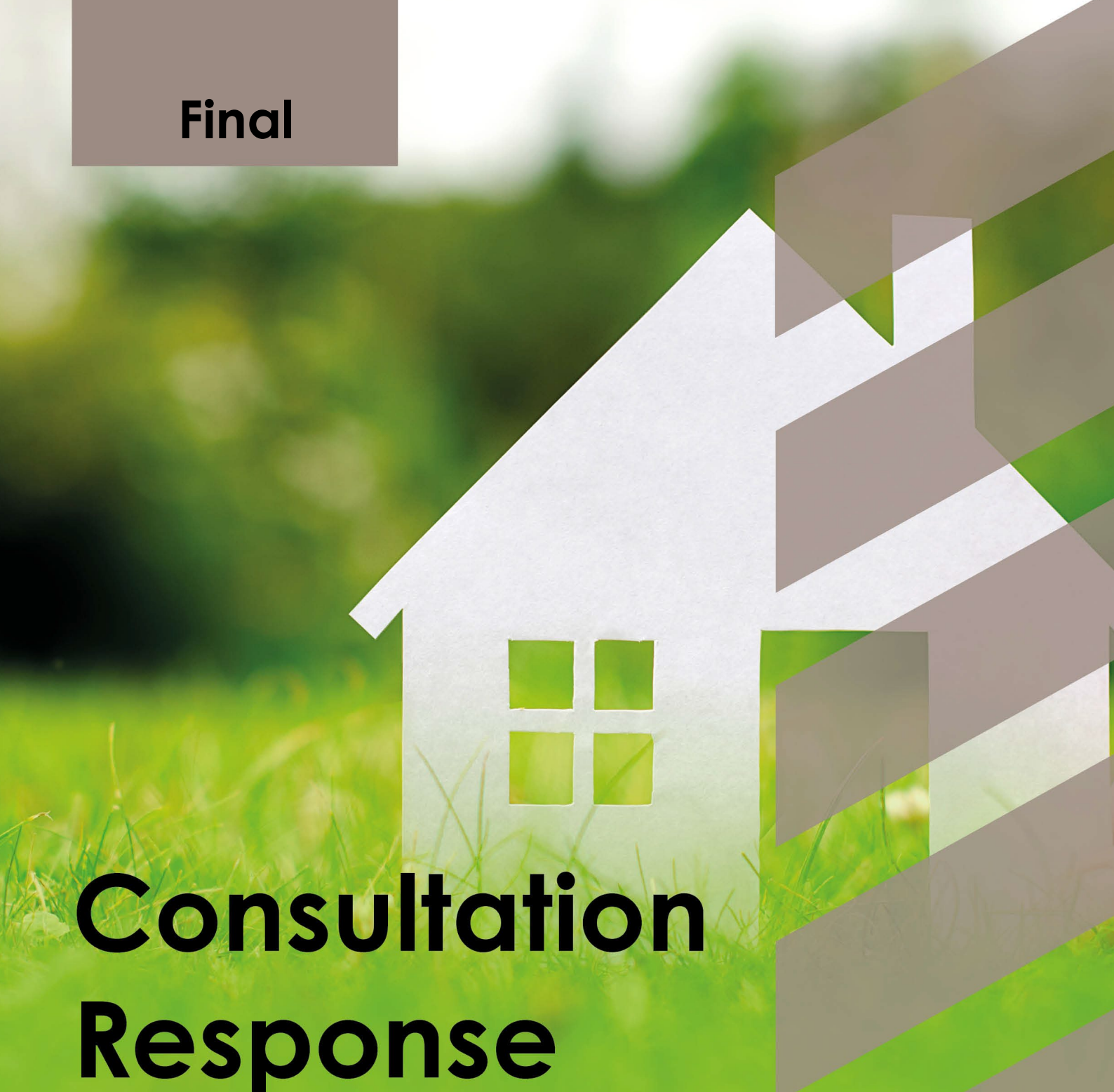

Consultation Response

Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes

Prepared for: DESNZ

Date: 12/12/2024

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1. Introduction

Elmhurst Energy are pleased that DESNZ are seeking a Consultation on '**Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes**' and as such we are delighted to respond to each question in turn.
The Consultation asked 90 questions and we have answered them all below. We hope you find the responses considered and useful for taking '**Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes'** forward in a progressive manner.

2. Questions and Answers

Part 1: Mid-scheme changes to current requirements

1. Do you agree that a household should be able to receive both loft and cavity wall insulation under GBIS?

Yes, Elmhurst believe this will help encourage a better uptake in delivery for homes across the country. More importantly, it can have a greater impact on improving energy efficiency in a property, making for warmer homes that use less energy, and emit less carbon.

2. Do you agree that we should allow this change to be effective from the date of consultation? If not, would you prefer the change to be effective from the date of Government Response, or the commencement date of the legislation

No, Elmhurst believe that any changes should be effective from the date of legislation.

3. Do you agree that smart thermostats should be an eligible secondary measure for owner-occupied households in the low-income group?

Yes, smart thermostats are a good measure of controlling temperature in a home. They offer an affordable solution to better management of heating systems, and have the potential (if used correctly) to reduce energy bills.

4. Do you agree that we should allow this change to be effective from the date of consultation? If not, would you prefer the change to be effective from the date of Government Response, or the commencement date of the legislation?

Elmhurst believe that any changes should be effective from the date of legislation.

5. Do you agree with allowing projects meeting the ECO4 rules to count towards an obligated supplier's GBIS obligation?

Yes, Elmhurst believe that by encouraging the process to happen this will increase delivery and improve the uptake and quality of installs in relation to better measures been installed.

6. Do you agree with our preferred opinion of a transitional arrangement that enables projects that have met the ECO4 rules during all phases of GBIS to be capable of counting towards GBIS obligations in phase A, B, or C?

Yes, Elmhurst believe this is a pragmatic approach and gives better opportunities for uptake by the industry.

7. Assuming the changes proposed in this consultation take effect, what proportion of your GBIS obligation is achievable?

NA – Elmhurst are a Certification body for Retrofit professional's and do not undertake installations.

8. Do you agree that the proportion of GBIS obligations that can be achieved via delivery under ECO4 rules should be limited? What should the limit be? Please provide as much detail as possible.

Elmhurst have no strong opinion on this matter.

9. Do you agree that a conversion factor should be applied to projects meeting the ECO4 rules that count towards GBIS?

Elmhurst have no strong opinion on this matter.

10. Do you agree with our estimate that the cost of achieving an ABS under GBIS would be £24.84/ABS with the proposed scheme changes? Do you agree that the cost of achieving an ABS under ECO4 (excluding EFG and SWI minimums) would be £17.87/ABS?

Elmhurst have no strong opinion on this matter.

11. Based on your interpretation of the costs per ABS for GBIS and ECO4, what conversion factor do you think 1 ECO4 ABS should be subject to in order to help keep total costs within £1 billion. Please provide answers based on: - A maximum of 25% of GBIS ABS being achievable through ECO4. - A maximum of 50% of GBIS ABS being achievable through ECO4. - A maximum of 75% of GBIS ABS being achievable through ECO4

Elmhurst have no strong opinion on this matter.

12. We are not considering utilising TMLP for ECO4 at this time. Do you agree with our approach?

Yes, Elmhurst agree with this approach. This risk of multiple measures is too great to reduce the requirements for PAS 2035, and the role of the Retrofit Coordinator is essential to ensure that the plan of works is implemented correctly.

13. Considering the details set out in this consultation and by TrustMark, do you agree with the proposal to introduce the version of TMLP for use in GBIS for loft insulation when delivered as a single measure (and heating controls when paired with loft insulation)?

Yes, Elmhurst believe this is a pragmatic approach to the delivery of loft insulation when delivered as a single measure.

14. For the adapted version of TMLP, have sufficient risks been identified and addressed in Table 1? If there are other stakeholder concerns that have not been identified in Table 1, please provide details of such concerns and proposed mitigations.

Elmhurst believe the key concerns have been identified in this approach.

15a. Given the structure of the version of TMLP suitable for GBIS, what are your views on the average cost assumptions for compliance with its processes (forecast at approximately £400 to £500)?
- Yes, £400 to £500 is about right
- No, cost would be significantly higher (£601 or more)
- No, cost would be slightly higher (£501 to £600)
- No, cost would be slightly lower (£300 to £399)
- No, cost would be significantly lower (under £300)
- Don't know / Prefer not to say

Prefer not to say.

15b. What do you think could be the main drivers for any potential savings between the costs of compliance with PAS 2035/2030 and the costs of compliance with TMLP for GBIS?

A reduction in PAS 2035 documentation/evidence will reduce the time, and subsequent cost to the installer without the need for a Retrofit Coordinator. As this is a low risk element, this should be seen as a positive move to help deliver an important and simple to deliver measure.

16. Given the forecast costs of the version of TMLP suitable for GBIS, and the potential impact on GBIS delivery, do you agree its introduction in the final year of the scheme would have a sufficient impact to make it worthwhile implementing?

Elmhurst believe that any scope to increase delivery of a measure that is low risk should be adopted, to ensure that as many homes can be improved as possible.

17. Are there any other changes, not proposed in this consultation, that you believe would increase levels of delivery under GBIS?

If yes, please provide details.

Elmhurst have no strong opinion on this matter.

18a. DESNZ's cost assumption for compliance with PAS 2035/2030:2019 processes is £1,030 per property retrofit (in 2023 prices) for both ECO4 and GBIS. The assumed cost does not vary according to how many measures are installed. Roughly what is the average cost you have experienced complying with the current PAS 2035/2030:2019 processes per property retrofitted? Please answer for both multimeasure and single-measure projects that have upgraded the fabric of a building, as relevant.

NA – Elmhurst are a Certification body for Retrofit professional's and do not undertake installation of measures.

18b. If you believe that the average cost does not fall between £900 to £1,100, please provide us with any information on ECO4 or GBIS PAS 2035/2030:2019 compliance costs per project to evidence lower or higher costs.

NA – Elmhurst are a Certification body for Retrofit professional's and do not undertake installation of measures.

19a. In September 2023 a new version of PAS 2035/2030 was published. Roughly what is the average cost you would expect for complying with the PAS 2035/2030:2023 processes per property retrofitted? Please answer for both multimeasure and single-measure projects involving an upgrade to the fabric of a building, as relevant.

NA – Elmhurst are a Certification body for Retrofit professional's and do not undertake installation of measures.

19b. Please provide us with any information to evidence why you believe the compliance costs to be within the range you chose.

NA – Elmhurst are a Certification body for Retrofit professional's and do not undertake installation of measures.

19c. What, if any differences, between PAS 2035/2030:2019 and PAS 2035/2030:2023 processes are driving any changes in costs?

The increased requirement on the Retrofit Coordinator to visit site for various measures will impact cost on delivery. Elmhurst believe that the original requirements were sufficient, and emphasis on the Installer providing evidence for the measure they are experts in should be sufficient. The Retrofit Coordinator is being expected to go above and beyond, and the Installer should be the key stakeholder in this element of the process.

20. We would like to understand more about the compliance costs of PAS 2035/2030. Please provide details on what you feel are the key cost drivers. For example, the PAS process, the need to use qualified professionals, the need to complete paperwork to demonstrate compliance with the PAS etc.

Elmhurst have no strong opinion on this matter.

21. What do you think the minimum certification requirements for low carbon heating and microgeneration installations should be under ECO4?

Elmhurst have no strong opinion on this matter.

22. Do you agree that the policy intent could be made clearer to facilitate Ofgem's ability to reject measures which have been identified as non-compliant by TrustMark?

Yes, Elmhurst welcome any measure that ensures that only compliant projects are funded and accepted.

23. Do you agree with our proposal to allow individuals with at least a Level 2 Technical and Vocational Qualification, or equivalent, to undertake a report substantiating the need for extraction of cavity wall or loft insulation for the purposes of determining building fabric repair expenditure?

Yes, Elmhurst support the proposal as defined and feel the consultation responses on this matter were sensible.

24. Are there any specific Level 2 Technical and Vocational Qualification qualifications, or equivalent, which would be most appropriate for those conducting this report?

Elmhurst have no strong opinions on this matter.

25. Do you think a Chartered Surveyor continues to be suitably equipped to conduct this assessment?

Yes, A chartered surveyor who had the appropriate qualification and training should be able to conduct this assessment.

26. Do you agree with amending the purpose of the assessment under article 62(2)(d)(i) of the ECO4 Order from; "identifying potential efficiency measures for improving the energy efficiency of the premises", to; "assessing the condition of the insulation and related building fabric", to more accurately reflect the role undertaken by the assessor?

Elmhurst have no strong opinion on this matter.

27. Do you agree with our proposal to update legislation so that SGLs can be evidenced by SAP assessments where they are installed alone, or alongside Data Light Measures?

Elmhurst have no strong opinion on this matter.

28. Are there any other barriers to delivering SGL projects under ECO4 we should be aware of?

Elmhurst have no strong opinion on this matter

29. Our objective is to ensure consumers receive the maximum benefit from their retrofit measures by encouraging smart metering uptake. Which is your preferred method for achieving this aim and why?

- Opinion 1 – Voluntary consumer pledge
- Opinion 2 – Consumers agree smart meter installation (to be arranged by their energy suppliers)
- Neither – the current process of providing smart meter advice to ECO4 and GBIS consumers should remain as it is now
- An alternative approach – please provide details of how your preferred approach is practicable for scheme deliverability and data privacy
- No view

No view

30. If Opinion 1 is your preferred opinion:
Were Opinion 1 to be implemented, how would you refine the approach to maximise its effectiveness? For example, what is the correct point to contact consumers?

Elmhurst have no strong opinions on this matter

31. If Opinion 2 is your preferred opinion:
Please provide descriptions of how this methodology could operate in practice for a) voluntary and b) mandatory agreement to a smart meter installation to receive retrofit funding. Please include information on data sharing routes, and how adverse impacts on deliverability can be minimised.

Elmhurst have no strong opinions on this matter

32. Do you think that Opinion 1 would impact scheme delivery for ECO4, GBIS and/or smart meter targets? If yes, please provide evidence to support your response.

Elmhurst have no strong opinions on this matter

33. Do you think that Opinion 2 would impact scheme delivery for ECO4, GBIS and/or
smart meter targets if it involved either:
- Opinion 2a) voluntary agreement for a smart meter installation; or
- Opinion 2b) mandatory agreement for a smart meter installation?

If yes, provide evidence to support your response.

Elmhurst have no strong opinions on this matter

34. Do you agree with our proposal to update the "rural area" definition in line with the planned ONS and Scottish Government updates?

Elmhurst have no strong opinion on this matter.

35. If transitional arrangements are required, which transition opinion would you prefer?

Elmhurst have no strong opinion on this matter.

Part 2: Pay-For-Performance

Annex A: Consultation questions

36. Do you plan to participate in ECO4 and/or GBIS PFP?

As a certification scheme for retrofit assessors and coordinators, we aim to promote the adoption of measured Heat Transfer Coefficient (HTC) within Pay for Performance (PFP) schemes across our membership and wider stakeholder network.

37. Where development time available to industry for PFP appears limited, would you favour government introducing PFP to ECO4 and GBIS or introducing PFP into any successor ECO scheme?

Elmhurst strongly advocates for integrating Pay for Performance (PFP) models into all ECO schemes to enhance accuracy, leveraging initiatives like the Elmhurst Energy Measured Energy Performance (MEP) Competency Scheme. This approach underscores the pressing need for clear policy signals and the adoption of SMETER measurement technologies, with backing from key stakeholders, including Build Test Solutions, Knauf, Saint-Gobain, and Elmhurst. Plans for further system developments by 2025 aim to refine HTC measurement and lodgement processes.

Key SMETER providers have already proven the feasibility of large-scale in-situ measurements through successful ECO3 Demonstration Action projects. These projects highlight significant opportunities for learning and efficiency improvements across stakeholders, including both Government and industry. There is no justification for delay. Early ECO4 projects, regardless of implementation method, offer a valuable chance to refine the PFP model for application in future schemes and related policy frameworks.

38. Do you agree with our proposal to limit ECO4 & GBIS PFP to SMETER methods? If not, what approaches do you think we should allow and why?

Elmhurst agree with this proposal. SMETER methods have been extensively developed, tested, and demonstrated through various projects and have proven their effectiveness in the industry over several years. This track record highlights their readiness for wider implementation.

Although not as detailed as full HTC measurements, we recommend acknowledgement is given to the importance of in-situ U-value measurements and airtightness tests. These techniques offer a dependable way to evaluate the effects of specific insulation or airtightness improvements. Incorporating these measurements into PFP frameworks or formally recognizing them as valid inputs could enhance the accuracy of RdSAP and SAP calculations.

39. Do you agree with the PFP application scope we have proposed?

Yes, Elmhurst agree with this.

40. Do you agree with the proposed role of the PFP Panel?

Yes, any panel should follow clear guidelines, such as responding to applications within a set timeframe, giving feedback on unsuccessful applications, and addressing resubmissions promptly. Applicants should also know what's required for submissions and how delays affecting project timelines will be handled. An appeals process should be included for contesting decisions on applications or final results.

41. What additional information should SMETER applicants be required to provide if anything, and why?

Elmhurst have no strong opinion on this matter.

42. Do you agree with us that updates or modifications to SMETER algorithms should be notified to the PFP Panel?

Yes. Any updates need to be notified and agreed by the PFP panel. We agree with the suggestion that the third-party auditor could provide/run a set of calculations using the same data to check that the results are consistent after an update, this sort of unit testing is common in software development and should be in place internally in SMETER calculators anyway.

43. Do you agree with our approach for validating the accuracy of Type 1 SMETERs? If not, what alternative do you suggest?

There are a number of Academic institutions that have relevant historical data who could be involved in this process of validating accuracy of particular SMETER types, for example Leeds Beckett, Salford University, UCL & Loughborough University.

44. Do you agree with our approach for validating the accuracy of Type 2 SMETERs? If not, what alternative do you suggest?

There are a number of Academic institutions that have relevant historical data who could be involved in this process of validating accuracy of particular SMETER types, for example Leeds Beckett, Salford University, UCL & Loughborough University.

45. Should we use a synthetic dataset, a real dataset or both when assessing SMETER accuracy, or another approach entirely? Please explain your answer.

Elmhurst have no strong opinion, but believe that the end results should reflect reality. There is a concern with a synthetic dataset that it is not truly reflective of a real situation, as such there should be some opportunity for open dialogue in the case of any mismatches with SMETER results.

46. If we were to rely on synthetic datasets for assessing SMETER accuracy, do you agree with our preference to exclude survey data? If not, why not?

Elmhurst have no strong opinion on this matter.

47. Do you agree with our proposal to set an NMBE accuracy minima of between -5% to +5% and set a CVRMSE accuracy minima of 0 to 20%? If not, what alternative rate or metric do you suggest?

Elmhurst have no strong opinion on this matter.

48. Do you agree with our proposal to set accuracy minima using both NMBE and CVRMSE to assess the accuracy of Type 1 and 2 SMETER approaches? If not, what alternate do you suggest for either or both of Type 1 & 2 methods?

Elmhurst have no strong opinion on this matter.

49. Do you agree with our preference to capture methodology repeatability via NMBE and CVRMSE? If not, how else should this be tested at application?

Elmhurst have no strong opinion on this matter.

50. Do you agree with our proposal to require SMETER monitoring to take place for a minimum of 28 days pre-retrofit and 28 days post-retrofit?

Elmhurst agree that incorporating both pre- and post-retrofit measurement and monitoring is essential, with a minimum period of 28 days offering a reasonable buffer to extend beyond the current minimum of 21 days. While this might be slightly more than absolutely necessary, it should not present a significant obstacle at this initial stage of implementing these new measurement tools. Such a period would help ensure more accurate data collection and better account for variations in external conditions.

51. Do you agree that SMETER providers (or their sub-contractors) should conduct the ongoing quality assurance we have stated? Besides anomaly detection, what else do you think this should comprise?

This is where the role of Elmhurst's Measured Energy Performance (MEP) Competent Person becomes vital. Trained in the technology and its application, as well as the operational parameters within which it functions, these professionals are well-positioned to provide the necessary quality assurance. More details on this competency role can be found at:

https://www.elmhurstenergy.co.uk/measured-energy-performance-competency-scheme/.

52. What other aspects, if any, of the ECO PFP application process, as proposed, do you disagree with or wish to provide further thoughts on?

Elmhurst have no strong opinion on this matter.

53. Do you agree with the likely data journey we have set out? If not, how do you expect this to differ?

Yes. An effective delivery model involves the Retrofit Assessor (RA) visiting the site for a Retrofit Assessment, during which they also obtain consent for smart meter data access and deploy temperature sensors. This RA must be a qualified professional trained in Measured Heat Transfer Coefficient (HTC). The SMETER provider would support these assessors with software and technical assistance. Alternatively, temperature and energy data could be collected via a smart home device, potentially eliminating the need for a home visit, with only supplementary data optionally gathered by an RA or MEP assessor. In both scenarios, we are confident that the required quality assurance standards can be maintained through competency checks mandated by the Measured Energy Performance Competency scheme

Whilst we agree that it's important that the input data is available for a third-party auditor on request, we agree that they don't have to be provided with all of the data for every calculation. This is probably more than they could practically review and therefore represents wasted repetition of storage in two places and more than necessary data transfer.

54. Do you agree with the data collection proposals? If not, please explain your reason and proposed alternative(s).

Yes – though in our experience accessing of Smart Meter data is notoriously difficult to access. Geotagged and time stamped photographs that can be easily verified should be acceptable as an alternative.

55. Do you agree with the proposed deadlines of two and 12 months of the retrofit completion date for lodging pre and post-retrofit SMETER HTC reads, respectively? If not, please explain your reasoning and proposed alternative(s).

Yes. It's important for the terms of the PFP panel and/or Trustmark to include a commitment to a specific timeframe within which a project will be reviewed and approved following the final submission. We recommend that post-retrofit SMETER HTC measurements be conducted as soon as possible after the completion of the retrofit. This will help ensure that the data reflects the true performance of the retrofit without being subject to delays that could impact the reliability and timeliness of the results.

56. Do you agree with those stipulations set out under "Monitoring and equipment requirements" for SMETER providers that would apply in the absence of an appropriate Certification scheme for SMETERs and in-use performance? What should be added or removed from this list if anything?

Elmhurst already have a competency scheme operating called Measured Energy Performance. https://www.elmhurstenergy.co.uk/measured-energy-performance-competency-scheme/

We have launched our Measured Energy Performance competency scheme back in June, we've updated the current technology providers, Build Test Solutions (SmartHTC), St Gobain (Qub) and Knauff Energy Solutions all of whom are very supportive.

57. How might those stipulations set out under "Monitoring and equipment requirements" best be evidenced and compliance assessed?

This is well addressed within our competency scheme stated in Q56. Audits will require evidence of compliance, including photographic documentation and an annual competency test to confirm adherence to process and methodology.

Lessons could be drawn from the approach used for airtightness testing, where reports detail the number of sensors employed, the data collection period, and other relevant specifics for each measurement. During audits,

testers should be prepared to present supporting materials such as photos, floor plans, and additional evidence.

Furthermore, much of this can be managed by the SMETER providers themselves during their application process, demonstrating to the panel the quality assurance measures in place. This could include mechanisms for verifying temperature sensor profiles, ensuring the integrity and accuracy of the data collected.

58. Should we require SMETER providers to lodge confidence ranges for each HTC value with TrustMark? As this would not inform scoring, what value do you think capturing this data would provide?

Yes, this allows a reasonable metric to evaluate the success of a new technology.

59. Do you agree with our preference for SMETER providers to upload HTC reads to TrustMark's Data Warehouse? If not, what alternate is preferable?

No. Having SMETER providers directly upload data into Trustmark adds complexity to the process. Instead, we propose HTC's should be lodged with a scheme such as Elmhurst – this information can subsequently be linked into Trustmark's Data Warehouse. This approach leverages an already established and accountable process for data uploading.

It is essential that any lodgement to Trustmark is conducted by an approved competency scheme. This ensures that the process is subject to proper oversight, including the review of lodgements and quality assurance checks to maintain data accuracy and reliability.

60. What other information should SMETER providers upload to TrustMark's Data Warehouse besides that stated?

Information should include building address, property type, and associated attachments. This streamlined approach supports a more complete record for audits and verification.
Additional information that could be included might consist of test methodology and technology (e.g., Qub, Knauf, SmartHTC), test date, mean

internal and external temperatures, and mean temperature differences. This would provide a high-level overview that aligns with measurement requirements.

61. Do you agree with our preference for TrustMark to access RdSAP-derived HTC values directly from scheme providers?

Yes, in principle, as it reduces the likelihood of 'gaming' the system. The development of a lodgement portal within Elmhurst's software would allow for a certificate to be produced which could be accessed via API.

62. If a Certification scheme relevant to SMETERs and in-use performance is available, do you think we should require adherence to it in PFP?

Yes, we agree and Elmhurst already have a competency scheme operating called Measured Energy Performance.
https://www.elmhurstenergy.co.uk/measured-energy-performance-competency-scheme/

We have launched our Measured Energy Performance competency scheme back in June, we've updated the current technology providers, Build Test Solutions (SmartHTC), St Gobain (Qub) and Knauff Energy Solutions all of whom are very supportive.

We have released our SAP10 HTC version so you can now input a measured HTC (obviously measured and calculated by a competent assessor) into the SAP 10 methodology and produce an energy report allowing to compare new build SAP as-built against measured performance. We have the ability to do this already for SAP2012 for New build and existing dwellings. When RdSAP10 is released we plan to have a software tool to allow us to complete Measured Energy Performance reports on existing dwellings.

Any tests completed using the validated technologies produces their own test certificate with their own unique identifier. Elmhurst intend to create a lodgement portal where the assessor lodges the measured HTC in a central database, that way we have an audit trail of all measurements that is traceable back to the original test calculation based on site measurement.

63. If an Certification scheme relevant to SMETERs and PFP is not available, do you think this is sufficiently mitigated by the activities of Ofgem, TrustMark, TrustMark-licensed scheme providers and the proposed activities of a third-party auditor in PFP? If not, what further activities are necessary to assure PFP in the absence of an Certification scheme?

In absence of an approved scheme then the mitigation by Ofgem, TrustMark, TrustMark-licensed scheme providers and the proposed activities of a third-party auditor would go a long way, but falls short of competency oversight and lodgement of tests.
The most important aspect is the lodgement of tests. This is imperative to ensuring that the quality is being achieved.

64. Do you agree that any Certification scheme to which we stipulate adherence in PFP should meet the criteria set out under the "Certification scheme(s) for SMETER providers" section? If not, what do you think we should add and/or remove from the criteria?

Yes, although any Scheme should adhere to Scheme Operating Rules. The committee that oversees the development of these SORs should be chaired by an independent and there should be representation of all key stakeholders - SMETER solution providers, assessors, Certification schemes, energy companies, DESNZ, Trustmark and Ofgem.

65. Do you agree with the process we have proposed for updates to SMETER providers' software and algorithms? What else should be required of them in these instances, if anything?

Elmhurst have no strong opinion on this matter.

66. Do you agree with the validation process? If not, please explain your reasons and proposed alternative(s).

Elmhurst have no strong opinion on this matter.

67. Do you agree with the auditing and risk management process? If not, please explain your reasons and proposed alternative(s).

Elmhurst have no strong opinion on this matter.

68. How can the risk that an installer reduces intended ventilation (as a means of artificially improving the HTC value) best be mitigated?

As part of the on-site evidencing, an installer should evidence the functionality of the ventilation system.

69. Do you agree with our preference to require GBIS retrofits to include only one of CWI, SWI, RIRI, FRI or PRI? If not, why not?

Yes, but floor insulation seems to be missing from this list.

70. Do you agree with our preference to require ECO4 retrofits to include at least one of CWI, SWI, RIRI, FRI and PRI? If not, why not?

Yes, but floor insulation seems to be missing from this list.

71. Do you think we should allow eligible heating measures to be delivered in ECO4 and GBIS PFP? If not, why not?

Yes, Elmhurst agree with this.

72. Do you agree with our proposal to allow repair and like-for-like replacement of efficient, broken boilers and ESHs in ECO4 PFP? If not, why not?

Yes, Elmhurst agree with this.

73. Do you agree with our preference to apply the same minimum requirement in ECO4 PFP as in the ECO4 main scheme? If not, why not?

Yes, Elmhurst agree with this.

74. Do you agree with our preference to allow exemptions to the minimum requirement while excluding 'consumer circumstances' as valid reasons for not meeting the minimum requirement in ECO4 PFP retrofits?

Elmhurst have no strong opinion on this matter.

75. Do you agree with our proposal to only include homes with a relevant smart meter in the eligible pool for ECO PFP?

No. From previous project work this has presented a problem as significant numbers of properties did not have smart meters and even those with smart meters proved challenging to access their data via 3rd party applications. Photographic time stamped and geotagged images of meter readings could be used in place.

76. Do you agree with our preference to limit PFP to properties with those characteristics set out above? If not, why not, and what characteristics should be omitted or included and why?

Elmhurst have no strong opinion on this matter.

77. Do you agree with our preference to require heat metering and electricity sub-metering in those circumstances outlined above?

Yes, Elmhurst agree with this.

78. Do you agree with our proposed approach to complementary insulation work?

Yes, Elmhurst agree with this.

79. Do you agree with our preference to align scoring in both ECO4 and GBIS PFP with the wider ECO4 and GBIS scoring systems, respectively? What changes do you think we should make to this, if any and why?

Yes, Elmhurst agree with this.

80. Do you agree with our proposals to align ECO4 and GBIS PFP evidencing with the approaches in the respective main schemes? If not, why and what alternative do you suggest?

Yes, Elmhurst agree with this.

81. Do you agree with our proposal to provide a PFP minimum score via the uplift? If not, please explain why?

Yes, Elmhurst agree with this.

82. Do you agree with the score outcomes we have set out in those scenarios in table 5? If not, why? In what other scenarios should we clarify PFP score outcomes?

Yes, Elmhurst agree with this.

83. Do you agree that anomalous HTC reads should still be lodged by SMETER providers with TrustMark? If not, please explain why.

Yes, Elmhurst agree with this, provided they are clearly labelled as such.

84. Do you agree with the overall uplift approach we have proposed for PFP? If not, why not and what alternative do you suggest?

Yes, Elmhurst agree with this.

85. Do you agree with the uplift rates we have suggested for both ECO4 and GBIS PFP? If not, please provide data to e.g. justify any costs not covered.

Yes, Elmhurst agree with this.

86. Do you agree with our proposal to allow the IM uplift for all eligible IMs where these are delivered in PFP? If not, why not?

Yes, Elmhurst agree with this.

87. Do you agree with our proposal to provide a hardware cost allowance for SMETER approaches that use physical monitoring devices? If not, why not?

Yes, Elmhurst agree with this.

88. Do you agree with the expenses allowance rate we have proposed?

Yes, Elmhurst agree with this.

89. Do you agree with our proposal for a 10% cap on GBIS and ECO4 PFP with all retrofit score contributing to this? If not, what do you propose and why?

Elmhurst have no strong opinion on this matter.

90. Do you agree with the policy linkages positions we set out between the PFP mechanism and main schemes? If not, please state which you disagree

Elmhurst have no strong opinion on this matter.

Contact Details

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

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