FAO Will Broad

Our current business activities within ECO are being curtailed in part or full by the lack of resource available within the marketplace that is able to satisfy the relatively low level of demand for RdSAP and/or epc generation by DEA/GDA's, when compared with our CERT/CESP levels of activity in the same period. Despite the ongoing ramping up of such DEA/GDA resources, the growing pressures on the installation sector to pass beyond the "survival" level of activity means that such increases will be quickly utilised and over-run by increasing rates of installation.

Recognising that there appears to be an element of error in the 'P' methodology is perhaps significant for measures other than cavity wall insulation (CWI). However, I suggest that the indicated level of inaccuracy for CWI at 3%, whilst notable, is insignificant when taken in the context of a theoretical calculation such as RdSAP, where selectable variants are much greater and perhaps in some instances result in inaccuracies as high as ±30% particularly when comparing theoretical savings with reality.

I further suggest that the 'P' methodology, even with its associated inaccuracy, at this time at least, remains a practical solution to help overcome the shortage of DEA/GDAs. As such, I recommend that the use of the 'P' methodology for CWI continue until the end of the current ECO period and then be reviewed relative to the available resource to technically address the "inaccuracy issue" at time of calculation, balanced against the ongoing throughput demands of the industry, in order to ensure that all ECO targets are indeed achievable and achieved.

In summary, we recommend that for CWI that the 'P' methodology be maintained until the commencement of the ECO:II period.

Mark McAlear

Managing Director