

F.A.O Will Broad
Head of ECO Environmental Programmes
Ofgem
9 Mill Bank
SW1 3GE

24th September 2013

Dear Mr Broad

This is our response to your message of the 27th August 2013 in relation to the ECO consultation on requirements for demonstrating characteristics of hard to treat cavities – We shall keep our response short and to the point and is as follows:

(1) 100% verification of narrow HTTC measures

As part of the Snug Network and using Insta Group as our GDP, we already have a robust system in place in relation to narrow cavity wall installations. We do not believe that any of our work is in question as to its compliance with the regulations and fail to see why we should be tarred with the same brush as those who have failed to comply. Surely a better approach would be to pursue those individual companies that have failed to comply with those regulations.

The proposals you are making would most likely steer our company away from participating in this activity as we believe them to be un-workable and non-profit making. After all we are doing this for the profit element of the work.

As a GDA, I can assure you that ECO customers are already frustrated by the length of time it takes to carry out, what in their eyes, should be a simple survey. The full intrusive EPC followed by an embarrassing occupancy assessment is bad enough and then to be only followed up by a technical survey means that we are already alienating customer's opinions. This is notable through the lack of referrals compared to what we would have seen under CERT.

The timescales for your proposals are incredibly short. It is unlikely that there is enough skill set within the industry to meet your needs causing further delays for these measures. The added costs of having an independent person verifying the narrow cavity on top of the marketing, GDA assessment, technical survey, and all other costs incurred are likely to make narrow cavities un-economical.

(2) Increased requirements on HTTC measures that require a chartered surveyors report

We direct you back to the points raised in number 1 in the respect of an EPC, occupancy assessment and a technical survey, to then follow this up then with a visit from a Chartered surveyor adds additional pressure on a customer, additional costs to the installer and additional delays to both. There is some doubt within the industry that the capacity exists for this to occur or indeed the willingness for chartered surveyors to be involved. To make matters worse the cost of carrying out such an exercise is likely to be prohibitive will result in us not actively pursuing this market.

It is highly unlikely that your proposal could take place by 1st October 2013 and this alone is a reason to not pursue the action.

Once again, if there is evidence that a minority of Installations companies are not following the guidelines sets, then the penalties should be imposed on those companies and not onto the majority.

(3) Increased technical monitoring

As a Green Deal Installer, under Insta Group as our Green Deal provider we are already monitored by them. We are not really in the best position to comment on an increased technical monitoring but would point out that again you are introducing further costs. These costs must be absorbed by the funding available to carry out these works, coupled together with the additional costs in points 1 & 2 above, we are in danger of all this type of work becoming not worth doing.

Perhaps once again the minority have caused a problem for the majority and we are all being tarred with the same brush.

Since December 2012, we have spent more than £40,000.00 preparing ourselves for ECO and Greendeal. We lost a huge amount of money through January, February and March as a result of the very slow up take and we are only just regaining some of the losses. Greendeal and Eco are **already** over legislated compared to the previous schemes we have worked on.

As a carbon saving industry we use approximately 30 sheets of paper per measure installed under Greendeal or ECO to comply with all the legislation in place. Numerous visits are made to each individual property and this can increase depending on the number of measures being installed at that property and the skill set required to carry out, for instance, a technical survey. As an industry I believe that we are far from carbon saving. Your proposals add further red tape to achieving carbon savings targeted for our country.

We are only a small company based in North Wales and tough decisions had to be made at the end of last year as to whether to invest in Greendeal, further tough decisions will have to be made whether to stay in Greendeal and Eco if your proposals are introduced.

I hope you have many responses to read through as this has a serious implication for the entire industry. We would welcome any questions that you have.

Yours sincerely

Aldridge Property Services Ltd

Paul Aldridge

Director