

Our Ref: BBA/ ofgem ECO consultation 27<sup>th</sup> August response



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Dear Will,

**Re: Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities**

The BBA welcomes the opportunity to respond to the ECO Consultation on requirements for demonstrating characteristics of hard-to-treat cavities.

The BBA is a United Kingdom Accreditation Service (UKAS) accredited construction products certification, testing, assessment and inspection service provider. We have over 40 years experience in providing impartial, independent information on products and their installation.

The BBA recognises the considerable challenges the Government faces in reducing Carbon Emissions and considers itself in an excellent position to help. The BBA encourages innovation within the construction industry and provides a route to market for new and innovative insulation products. We support product approval through testing, site inspection and management system auditing.

The BBA's response to the consultation is document below:

**Part 1: 100% verification of narrow HTTC measures**

The BBA understands Ofgem needs to have confidence that HTT measures claimed under ECO meet the statutory definition of a HTT cavity before it can attribute savings to the measures. The introduction of 100% verification will provide that assurance but in the BBA's opinion it may be at a significant expense, added complexity and logistical difficulty that the industry may not be able to sustain.

It would be extremely difficult and expensive to ensure that all HTT narrow cavity installations are monitored before or during their installation. We currently monitor between 1% and 5% work-in-progress installations, depending on which scheme we are providing the services for, and even that volume places significant additional cost on our clients at what is a difficult time for the industry. There are logistical difficulties in meeting these relatively low volumes due to a mixture of reasons, including availability of installers, timeframes around when installations are going ahead, consumers moving dates, breakdowns of vehicles and inspector availability in any one area, especially as those volumes fluctuate considerably over periods of time.

The UK Representative in EOTA (European Organisation for Technical Approvals) and in the UEAtc (European Union of Agrément).

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The BBA realises it is not the only technical monitoring (TM) agent and PAS 2030 inspection service provider but we are the most experienced, especially with regards to work-in-progress inspecting (WIP). Other providers must deal with the same problems, so we fully understand these challenges.

The current situation may have arisen because the process of WIP technical monitoring for ECO has not been fully implemented yet. The BBA believes that the existing TM inspection model can provide the required assurance and confidence.

The current model allows for TM agents to be reporting, during the WIP inspections, whether the HTT works are as detailed in the claim. Those reports go direct to the suppliers so the 'consequences' of making inaccurate claims should be detailed by the suppliers to the installers and clear enough to allow the suppliers to take action against their supply chains. The BBA is not party to those agreements.

The current process should also allow for monitoring to be undertaken randomly. The installers should be advising the Energy Retailers or their technical monitoring agents (TM) in advance of all the installations taking place, (this may not currently be happening but we believe it should and will). The TM agent should then choose at random a selection of installations for a particular HTT type. All parties would be looking for 100% pass rate with regards to HTT measure type (you may not possibly achieve a 100% quality of installation pass rate but that will be reported separately) and if not found Energy Retailers could then implement the agreed consequences. The consequences can be tough and applied either with immediate effect or over a period of time as agreed by the parties. It could include a higher rate of inspection for a particular installer.

The TM is already being completed by independent bodies as required by Ofgem, which have the appropriate skills and experience. The volume of monitoring required should be kept at 5% to achieve the required results or can be increased to 10% if required, of which the additional 5% is work-in-progress as suggested in part 3 of the consultation, to provide additional confidence but only if and when it has been identified that the current process is not providing the desired results.

The BBA does not know the details of the inaccurate notifications but the current process detailed above should be sufficient to ensure accurate notification moving forward if time is allowed for the process to be fully implemented.

It may be worth Ofgem considering a further extension of time to allow for the current TM requirements to provide the required results before taking action as detailed in the consultation.

## **Part 2: Increased requirements on HTTC measures that require a chartered surveyor's report**

The BBA has no comment on this section of the consultation.

## **Part 3: Increased technical monitoring**

The BBA notes Ofgem's requirement to implement all three proposals. In the opinion of the BBA, as detailed in the response to part 1 of the consultation, the increase of TM for WIP installations may help improve the accuracy of reporting but only if Ofgem feel it is currently necessary.

The report forms look adequate should Ofgem decide to introduce this proposal.

We would, of course be happy to attend any meetings Ofgem proposed to discuss the points raised.

Yours sincerely

Peter Maddern

Head of Contractor and System Certification