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24 September 2013

Will Broad
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Dear Will

Climate Energy's response to Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities.

Thank you for the opportunity to comment on the Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities.

Comments on three proposed requirements:

1. 100% verification of narrow hard to treat cavities

100% verification will impose a significant increase in process time and costs. It will be the responsibility of the installer to provide an independent assessment and declaration. This will add an additional layer of costs, for SME's this cost can be significant especially as every installation will require a visit from the surveyor.

An alternative methodology that would save time and significantly reduce costs for the domestic energy user whilst ensuring Ofgem can be certain that the site is suitably assessed is with a photograph of the measurement of the cavity, backed up by a GPS location stamp. The measurements and evidence can be audited and verified with a random sample check in the back office.

2. Increased requirement on HTTC measures that require a chartered surveyors report

General practice would be for the installer to commission the surveyor rather than the supplier. Ofgem's requirement of the chartered surveyor to visit the site would be impractical and severely increase cost and complexity.

The chartered surveyor will need the following information in order to assess and provide a report (desk based):

- Photographic evidence
- Accurate measurements
- Full description and photo graphic evidence of the property(s)
- Type of remedial works needed
- Signs of failed insulation
- Health or safety risks

A chartered surveyor's visit to every individual site is impractical and extremely expensive (the cost will significantly increase as the chartered surveyors qualifications will be reflected in the price, for a job that is far below his or her qualifications. The increase in cost will be substantial enough to make the installation uneconomical). It would be practical for a chartered surveyor to visit a site such as a tower block or a full street of homes because the cost can be spread across each flat or home. A flat fee should be agreed and published by the accreditor (RICS).

An alternative proposal which ensures Ofgem can be certain that the report has been suitably assessed with appropriate measurements and data, could be to continue to use a chartered surveyor to perform a desk based exercise. This will be consistent with current costs and avoid cost increases with asking the chartered surveyor to visit the site.

However within the chartered surveyor's declaration there should be an additional declaration that must be signed by the technically competent individual providing the measurements and evidence that is submitted to the chartered surveyor. The declaration should state that they have appointed the chartered surveyor to give their professional opinion and recommendation on the property and type of insulation to be installed based on accurate and appropriate measurements and photographs taken of the property(s).

The declaration for the chartered surveyor should also include a section stating that the surveyor has no vested interest in the installations and is acting as an independent assessor.

If a situation presents itself with a nonstandard property where the technically competent person is not qualified enough and does not feel comfortable to assess and gather information for the chartered surveyor, then on that specific occasion, the chartered surveyor can be appointed to visit the property. If this is the case then a suitable flat fee should be agreed and published by the accreditor (RICS).

3. Increased technical monitoring

Increasing the percentage of technical monitoring will have significant practical implications. Although the idea in theory is a good one there are only a handful of accredited assessor companies and an increase in technical monitoring would add strain

on the securing an independent assessor as the demand will be too high. The independent assessors are currently giving a time delay of two weeks to simply look at a proposal. The installers are only notifying installations a few days in advance of the work taking place because they will have to locate the sites and if the time is right (considering weather location etc.) the installer will begin work. The timing between the installation and the independent assessor is very difficult to manage for working progress independent monitoring especially for hard to treat properties which are situated in difficult locations. Finally as demand will increase for pre install independent assessment of solid wall insulation there will be added pressure and difficulty in securing working progress independent monitoring. Costs will also increase and independent assessors will choose the best paid jobs leading to last minute cancellations.

A recommended way of avoiding these issues could be to continue with post installation inspections with an increased technical monitoring percentage.

If you wish to discuss any of the above comments and suggestions please do not hesitate to contact me.

Yours sincerely

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