

19th September 2013

The Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

EnergyCare Group Limited response to OFGEM consultation on requirements for demonstrating characteristics of hard-to-treat cavities

Energy Companies Obligation (ECO)

Dear Sirs

The purpose of this letter is to outline our thoughts and concerns regarding the proposed hard to treat cavity wall insulation policy, and intended to provide clarity on how we believe certain issues that have been identified can be overcome.

Verification of narrow cavities

The current practice of EnergyCare Group is to carry out a two stage assessment. Firstly, a qualified surveyor will undertake an initial survey which will involve drilling a minimum of three test holes on each elevation to establish suitability under the hard to treat scheme. Upon installation, our approved installer will fully drill the property in accordance with the British Board of Agreement's specification. Each injection hole will then be depth gauged and the relevant narrow areas marked accordingly on the enclosed Hard to Treat Cavity Wall Declaration Form. This forms part of the work pack that is supplied to the Energy Companies. We have demonstrated this procedure on site with EDF energy and the BBA on numerous occasions and would welcome increased on site audits to satisfy the requirements.

Increased Verification of narrow cavity

Our concerns from speaking & meeting with independent verification bodies is that it has become apparent that they would only verify points made available at ground level, i.e. up to 5ft for health and safety reasons. This meaning that all audits would be limited to no higher than eye level on a property and therefore would not constitute a full and fair assessment, thus resulting in a major shortfall in delivery on the CERO scheme under the HTT narrow cavity programme. In addition, the logistical problems of arranging mid installation inspections render the process unfeasible. Quite simply, the independent verifiers do not have the resources to carry out the volume required.

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

The current practice of EnergyCare Group regarding hard to treat remedial works is to verify the remedial and supply sufficient evidence to an appointed chartered surveyor by using the enclosed Hard to Treat Cavity Wall Declaration Form and where possible, photographic evidence. The chartered surveyor will only sign this work off if the documentation supplied satisfies their requirements. Again this form and any further evidence forms part of the work pack which is supplied to the Energy Companies.

Increased Verification of remedial works

Our concerns are from our research and liaising with independent chartered surveyors is that there aren't the resources to satisfy 100% on site visits by a qualified chartered surveyor. This again would result and affect the delivery of the scheme. We feel that the above practices are sufficient and would welcome further inspections from the British Board of Agreement and the energy suppliers during installation.

Recommendation for decision making process

I feel that it would benefit OFGEM and the industry if a board was formed to include representation from OFGEM, the National Insulation Association, the Cavity Insulation Guarantee Agency council and an elected member of an installation company. This would help achieve a broader perspective in decision making and would result in a more realistic and achievable method in meeting targets to a satisfactory standard.

Yours faithfully



Adam Malia
Director
EnergyCare Group Limited

Hard to Treat Cavity Wall Declaration Form

Customer Details:

Name Example

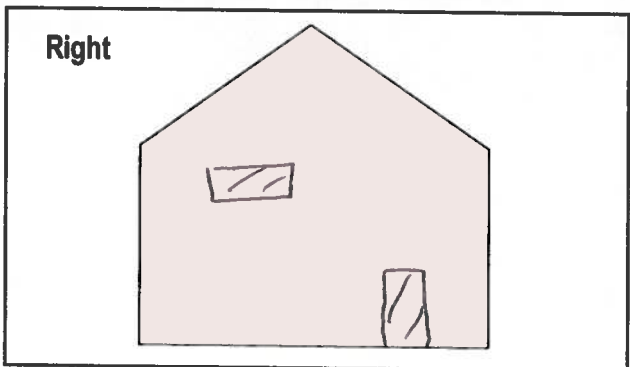
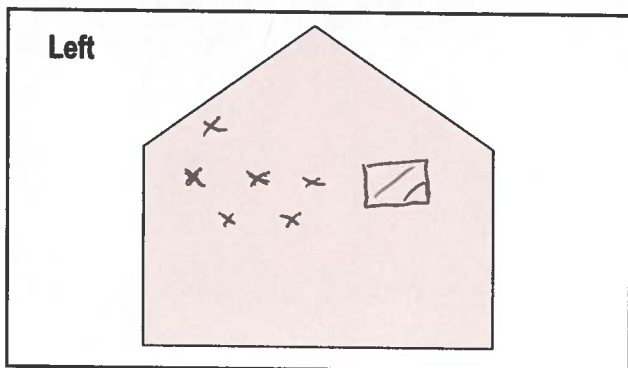
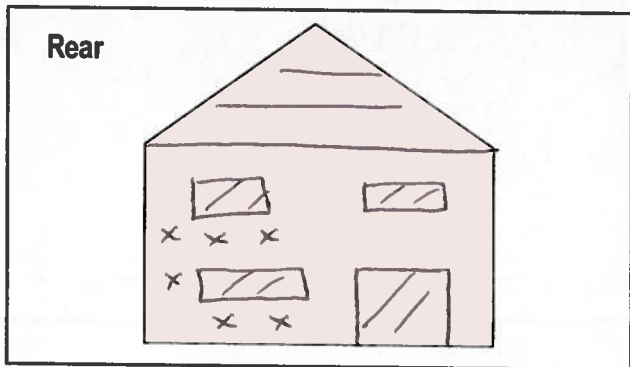
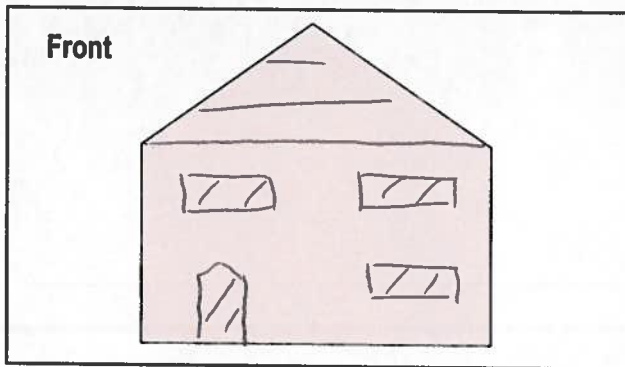
Address 3 Triumph way
Kempston

Postcode MK42 7QB Date _____

PROPERTY TYPE

FLAT MID TERRACE END TERRACE SEMI BUNGALOW DETACHED BUNGALOW SEMI HOUSE DETACHED HOUSE

The area's highlighted on each elevation below have a cavity width of between 40mm and 49mm



TECHNICIAN

Name _____

Company Name _____

Signed _____

Date _____

CUSTOMER

Name _____

Signed _____

Date _____

MATERIAL USED

InstaFibre White Wool 89/2294
InstaFibre Yellow Wool 88/1976
InstaFibre Carbon Plus 13/4989
Insta Polypearl 11/4685
InstaBead Diamond 11/4687
InstaBead 04/4155

CUSTOMER - BY SIGNING THE ABOVE YOU CONFIRM THAT YOU HAVE BEEN ADVISED THAT YOUR CAVITY WALL IS CLASSIFIED AS 'HARD TO TREAT' IN ACCORDANCE WITH GUIDANCE ISSUED BY OFGEM.

THIS GUIDANCE SPECIFIES THE FOLLOWING CRITERIA TO QUALIFY:
A WALL THAT HAS A SECTION OF CAVITY WHICH IS LESS THAN 50MM WIDE.

THIS FORM MUST BE KEPT AS A RECORD AND SHOULD BE MADE AVAILABLE UPON ANY FURTHER INSPECTIONS

Hard to Treat Cavity Wall Declaration Form

Customer Details

Name Example
Address 3 Triumph Way
KEMPSTON
Postcode MK42 7QB Date _____

The area's highlighted on each elevation below require substantial remedial work of 4 or more hours.

PROPERTY TYPE

- FLAT MID TERRACE END TERRACE SEMI BUNGALOW DETACHED BUNGALOW SEMI HOUSE DETACHED HOUSE

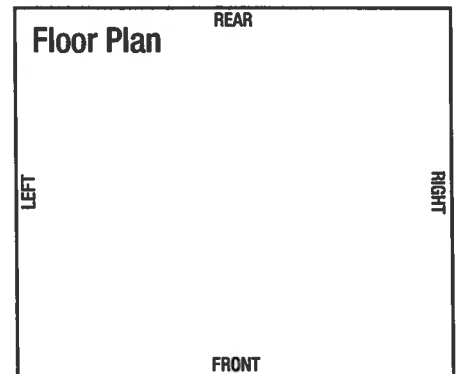
<p>2 Bricks xx</p>	<p>DEBRIS REMOVED <input checked="" type="checkbox"/></p> <p>REPOINTING <input type="checkbox"/></p> <p>REMOVAL OF CAVITY WALL INSULATION <input type="checkbox"/></p>	<p>DEBRIS REMOVED <input type="checkbox"/> (N/A)</p> <p>REPOINTING <input type="checkbox"/></p> <p>REMOVAL OF CAVITY WALL INSULATION <input type="checkbox"/></p>
<p>2 Bricks xx</p>	<p>DEBRIS REMOVED <input checked="" type="checkbox"/></p> <p>REPOINTING <input type="checkbox"/></p> <p>REMOVAL OF CAVITY WALL INSULATION <input type="checkbox"/></p>	<p>xx x - 4 xx BACKS</p> <p>DEBRIS REMOVED <input checked="" type="checkbox"/></p> <p>REPOINTING <input type="checkbox"/></p> <p>REMOVAL OF CAVITY WALL INSULATION <input type="checkbox"/></p>

TECHNICIAN

Name _____
Company Name _____
Signed _____
Date _____

CUSTOMER

Name _____
Signed _____
Date _____



CUSTOMER - BY SIGNING THE ABOVE YOU CONFIRM THAT YOU HAVE BEEN ADVISED THAT YOUR CAVITY WALL IS CLASSIFIED AS 'HARD TO TREAT' IN ACCORDANCE WITH GUIDANCE ISSUED BY OFGEM.

THIS GUIDANCE SPECIFIES THE FOLLOWING CRITERIA TO QUALIFY: SUBSTANTIAL REMEDIAL WORK OF 4 OR MORE HOURS.

THIS FORM MUST BE KEPT AS A RECORD AND SHOULD BE MADE AVAILABLE UPON ANY FURTHER INSPECTIONS