

Llewellyn Smith Limited

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

Consultation Response.

Source	Text from the Letter dated 27 August 2013 or Appendix 1 or 2.	Llewellyn Smith Comments
<p>Letter page 2.</p> <p>This is from the second paragraph.</p>	<p>“1.100% verification of narrow HTTC measures.”</p> <p>“We propose that prior to the notification of a narrow HTTC measure a <i>Narrow HTTC Declaration Form</i> (Appendix 1) must be completed by a person with appropriate skills and experience who is:</p> <p><input type="checkbox"/> an employee of the supplier; or</p> <p><input type="checkbox"/> independent of the supply chain (this includes independence from the installer, third party agents, surveyors, social housing providers etc., but does not require independence from the supplier).”</p>	<p>We suggest that “assessor”, Ofgem’s definition in Appendix 1, is renamed as a Verifier. An assessor is a person that assesses the property’s suitability to have cavity wall insulation installed within the hard to treat definitions and is employed by a contractor under the BBA Assessor scheme.</p> <p>We also suggest that the Verifier’s company is <u>able</u> to work with a member of the supply chain when the following conditions are met:</p> <ol style="list-style-type: none"> 1.The Verifying Company is an independent company with “no financial interest in any entity involved in the installation of the measure” 2. The Verifying Company is a member of the RICS ECO Assessor Scheme. <p>The second point establishes a qualifying level of knowledge and professionalism of the verifying company.</p>
<p>This is from the third paragraph.</p>	<p>“The person who signs the declaration must personally assess the site that is the subject of the declaration. We recommend that the assessment take place before installation of the measure is complete so that additional drilling is not required.”</p>	<p>We suggest that this can be achieved through a visit by the independent assessor (verifier). The installer assesses that the property qualifies as a narrow HTTC through drilling each elevation.</p> <p>These holes are repaired with silicone mastic. The assessor (verifier) can then visit site separately of the installer, remove the mastic, verify the measurements on each elevation and renew the mastic.</p> <p>In this case there is no additional drilling. This overcomes the logistical issues of coordinating visits with the installer. This is to happen before the installation of the</p>

		measure.
Appendix 1. page 3	<i>"Measuring a cavity</i> The measurement is to be taken while the installer is on site and so will not require additional drilling."	The proposal as described above overcomes this requirement.
Letter page 2 This is from the last paragraph	<p>"2. Increased requirements on HTTC measures that require a chartered surveyor's report.</p> <p>"The chartered surveyor who writes this report must:</p> <ul style="list-style-type: none"> <input type="checkbox"/> be either a chartered building surveyor or a chartered surveyor who has qualified through the residential survey or valuation pathway. <input type="checkbox"/> be independent of the supply chain (this includes independence from the installer, third party agents, surveyors, social housing providers etc., but does not require independence from the supplier); <p><input type="checkbox"/> personally assess the site on which s/he is reporting. "</p>	<p>We also suggest that the chartered surveyor company <u>is able</u> to work with a member of the supply chain when the following conditions are met:</p> <ol style="list-style-type: none"> 1.The Chartered Surveyor Company is an independent company with "no financial interest in any entity involved in the installation of the measure" 2. The Chartered Surveyor Company is a member of the RICS ECO Assessor Scheme. <p>The second point establishes a qualifying level of knowledge and professionalism of the verifying company.</p> <p>We agree that the chartered surveyor assesses the site. However, we believe that a person with "appropriate skills and experience" (a verifier), actually visits every site. This would be the same verifier who visits the narrow cavity measures. He/she would prepare a report with photographs which would demonstrate the measure qualifies as a HTTC.</p>
Appendix 2 page 5.	<p>"DECLARATION BY CHARTERED SURVEYOR: <i>I have visited and personally assessed each property to which this report relates. I understand that this report may be produced to Ofgem for the purpose of demonstrating that a cavity wall has the characteristics stated in this report. The statements I have made in this report are true and accurate to the best of my knowledge. "</i></p>	<p>The chartered Surveyor's report would, therefore, be assessed by the chartered surveyor for each property following an on-site visit by the verifier.</p> <p>The only alteration of wording that would be "I have personally assessed each property, <u>that our verifier has visited</u>, to which this report relates."</p> <p>This alteration would retain the 100% verification requirement of the consultation and would be conducted pre installation of the measure.</p>

