

ECO Consultation on requirements for demonstrating characteristics of HTTC

1. 100% verification of narrow HTTC measures

Rockwool generally supports the proposals set out for verification of narrow HTTC measures, and in particular we strongly support the proposals to ensure the independence of the person conducting the verification from the supply chain. However we believe the term ‘appropriate skills’ must be defined. Also, it would be useful to emphasise that the compliance of measures with Ofgem’s HTTC CWI criteria is ultimately the (energy) supplier’s liability.

Narrow HTTC Declaration Form

We broadly support the information that is asked for on the verification form however to simplify compliance checking the drill points used for measuring cavity width must also be noted. These are included on the assessment reports sent to the BBA in their role as the surveillance scheme operators. A copy of the assessment report should therefore be kept with the declaration.

2. Increased requirements on HTTC measures that require a chartered surveyor’s report

Although we agree with the principle of increasing requirements for HTTC measures that require a CS report, there are issues within the categories of HTTC that require urgent clarification.

Severe exposure to wind driven rain should be removed from the description of cavity walls which may not be suitable to insulate with standard materials or techniques in Ofgem’s ECO Guidance for Suppliers and instead included as a sub-category of walls which require substantial remedial works.

Ofgem’s ECO Guidance for Suppliers states in 5.14(2) that “Reasons for a wall being unsuitable for standard cavity wall insulation materials or techniques may include:- severe or very severe exposure to wind driven rain, risk of water penetration, timber frame and other unsuitable construction types or cavities which are already partially filled.”

Ofgem’s guidance continues: “One of the means by which a chartered surveyor can determine whether a cavity wall is, or is not, suitable to insulate with standard cavity wall materials or techniques is by reference to the requirements in place on 31 December 2012 to be awarded a CIGA guarantee. If, by reference to these requirements, a guarantee would not have been available for a particular cavity wall on 31 December 2012, then this indicates that the wall is not suitable to insulate using cavity wall materials or techniques. It is acceptable for a chartered surveyor to use other reasonable means for determining whether a wall is suitable to insulate with standard cavity wall materials or techniques. The surveyor’s reasons for judging that a cavity wall is not suitable to insulate with standard cavity wall insulation material or techniques must be detailed in their report.”

CIGA guaranteed CWI systems were not restricted by exposure zone before 31 December 2012 and therefore cavities in severe or very severe exposure zones are not by default hard-to-treat. However due to specific combinations of exposure and constructional design/quality, certain properties in severe exposure zones will be deemed unsuitable for the installation of blown CWI without additional treatments, such as weatherproofing. If these additional works take four hours or more then these properties are properly covered under the category of remedial works.

Pg 6 of Appendix 2 (Chartered Surveyor Report)

We are concerned that 'removal of failed cavity or solid wall insulation' has been included without further explanation. Firstly, failing systems should be referred to the guarantee provider for proper assessment and, where appropriate, remedial action. Secondly, any carbon assumed to have been saved as a result of CWI installed as part of any previous schemes such as EEC, CERT, etc. will already have been counted and should not qualify for further subsidy.

We would urge Ofgem to ensure their guidance is very clear on these issues. Specifically we would ask that the guidance on the chartered surveyors report is updated to include the following text alongside its inclusion of 'removal of failed cavity or solid wall insulation'.

Where the removal of failed cavity or solid wall insulation is proposed for ECO funding, the surveyor must assess:

- (a) whether the existing insulation was installed with a guarantee. If so, then it should in the first instance be referred to the guarantee provider for investigation and, if required, remedial action and;
- (b) whether the existing insulation was installed and counted against a previous obligation scheme so there is no double counting of saved carbon.

Pg 3 of Appendix 2 (Chartered Surveyor Report)

B1 14: If the cavity walls are deemed currently not suitable to insulate with any existing insulation measures or techniques, a copy of the report should be sent to Ofgem to enable it to log these properties and suitably interrogate any future applications for the properties affected. This would not exclude the possibility that future innovation in systems or techniques could be developed to enable previously untreatable cavities to be filled, but would ensure that Ofgem can verify that these particularly challenging properties are being treated appropriately.

B1 16: It would be useful to provide tick boxes of the qualifying categories where the surveyor is asked why a material/technique is non-standard.

B2 18: Again, it would be useful to provide tick boxes of the qualifying works. It would also be useful to list examples of non-qualifying works such as repairing gutters or windows, replacing as opposed to cleaning wall ties etc.