

September 22, 2014

Dear Sir,

Energy Companies Obligation (ECO): changes to the Guidance for Suppliers

Please find Co-Operative Energy's response to the above consultation below.

New CERO primary measures: Minimum insulation level to support a secondary measure

Question 1a) Do you agree that insulation of a cavity wall must be installed to at least 50% of the total exterior-facing wall area of the premises in order to support a secondary measure?

Yes, we agree that this should be a requirement for installation of a secondary measure.

Question 1b) Please give reasons for your answer.

Secondary measures are just that and there should therefore be a requirement for a minimum level of more effective carbon reducing primary measures to be installed before secondary measures are permitted.

Roof-space insulation

Question 1c) Do you agree that roof-space insulation must be installed to at least 50% of the total roof-space area of the premises in order to support a secondary measure?

Yes, we agree that this should be a requirement for installation of a secondary measure.

Question 1d) Please give reasons for your answer.

Yes, please see our answer to Question 1 b) above.

Connections to a district heating system: Pre-conditions for the premises under CERO and CSCO

Question 2a) Do you agree with the reasons we are proposing for judging why any of the roof-space or exterior-facing wall area cannot be insulated?

Yes, we agree that an inability to access the wall in order to carry out the insulation work, possible violation of planning laws or refusal of consent by the occupier or landlord are acceptable reasons for this.

Question 2b) Are there any other scenarios where the exterior-facing wall area of a premises being connected to a DHS cannot be insulated?

We are unable to suggest any at this time.



recycled material

Question 2c) How can suppliers demonstrate for compliance purposes that the exterior-facing wall area cannot be insulated?

We would have thought that in the case of impossibility of access to the wall photographic evidence would be sufficient. For possible violation of planning law or refusal of consent, written proof of this would be likely to be required.

Question 2d) Are there any other scenarios where the roof-space area of a premises being connected to a DHS cannot be insulated?

We are unable to suggest any at this time.

Question 2e) How can suppliers demonstrate for compliance purposes that the roof-space area cannot be insulated?

Please see our answer to Question 2c) above. For impossibility of access, photographic evidence should be provided. For possible violation of planning law or refusal of consent, written proof should be required.

Question 2f) Are there any additional factors that can affect the decision on whether or not to insulate a premises?

We are unable to suggest any at this time.

Question 2g) Do you agree that, where the roof-space area or total exterior-facing wall area of the premises are insulated to less than 100% but more than a specified minimum level, a DHS connection should be eligible where the remaining area cannot be insulated?

Yes, with the proviso that proof is provided as to the reason for it not being possible to insulate the remaining area.

Question 2h) Do you agree that this minimum level should be set at 50%?

We agree that 50% is a suitable minimum level.

Connections to a district heating system: Pre-conditions for the premises under CERO and CSCO

Question 3a) Do you agree with our proposal to require evidence that the installation of a measure complies with Building Regulations?

Yes, as this will avoid poor quality installations and drive up standards within the ECO programme.

Question 3b) If this requirement was introduced, how could compliance be demonstrated?

We are of the view that the forms of evidence suggested by Ofgem in the consultation document (an approval certificate by a building control body, an approval certificate by Approved Inspectors or a building regulations compliance certificate issued by a competent person scheme) would be suitable.

Question 3c) Are you aware of any other means of evidencing compliance with building regulations other than those listed (for either the installation or the product and system, or both)?

We are not aware of any as this is not, as an energy supply company, an area we specialise in, particularly as we subcontract delivery of our ECO obligation through a third party.

Question 3d) Do you think we should introduce this requirement from the date version 1.2 of the guidance takes effect or for the next ECO obligation period (2015-2017)?

We believe this requirement should be introduced for the next ECO obligation period (2015-2017) as this will then allow obligated parties and third party ECO service providers sufficient time to put the necessary operational changes in place.

General comments on our guidance (version 1.2)

Question 4a) Please provide any further comments on the changes to our draft guidance document (version 1.2).

We have no further comment beyond those listed above.

I trust this response will prove useful, please do not hesitate to contact me should you have any questions or require any further information.

Yours faithfully,

Chris Hill