Llewellyn Smith Limited

Energy Companies Obligation (ECO) Guidance for Suppliers (Version 1.2)

Publication dated 11 08 14, response deadline 22 09 14

Consultation Response.

Question/ clause	Text from the Guidance	Llewellyn Smith Comments
Q1a	**Insulation of a cavity wall.** **Do you agree that insulation of a cavity wall must be at least 50% of the total exterior facing wall area of the premises in order to support a secondary measure?**	We agree that the minimum level should be 50%.
Q1b	**Please give reasons for your answer.**	This maintains consistency with the previous 50% rule in CERO.
Q1c	**Do you agree that roof space insulation must be at least 50% of the total roof space area of the premises in order to support a secondary measure?**	We agree that the minimum level should be 50%.
Q1d	**Please give reasons for your answer.**	50% of the roof space makes sufficient allowance for obstructions within the roof space.
Q3a	**Do you agree with our proposal to require evidence that the installation of a measure complies with Building Regulations? Please give reasons for your answer.**	No. Currently, the installation of a BBA certified product system, together with the BBA approval of installers meets building regulations. Having attended the workshop on the 28th August 2014 when this issue was raised, it was stated that the overriding reason for introducing more compliance was that Ofgem have received "anecdotal evidence of poor quality installations under ECO. In response to this, we would like to strengthen our approach to ensuring that a completed measure complies with building regulations". We have expanded upon our suggested solutions in our response to question 4.

Q3b	**If this requirement was introduced, how could compliance be demonstrated?**	No response.
Q3c	**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)? If so, please provide details.**	A more robust approach to accreditation and constant review under PAS 2030 would show compliance with building regulations. This should be linked to technical monitoring whereby feedback is given to the relevant PAS 2030 accreditation body for each installer. This feedback would be from the energy supplier who receives the technical monitoring results. Technical monitoring should include more "quality of installation" based questions.
Q3d	**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)? Please give reasons for your answer.**	We think that any changes should come into effect from April 2015 to allow sufficient time for the correct changes to be made.
Q4	**Please provide any further comments on the changes to our draft guidance document (version 1.2).**	Our comments below are based upon the statement in clause 3.4, that "we have received anecdotal evidence of poor quality measure installations under ECO. In response to this, we would like to strengthen our approach to ensuring that a completed measure complies with building regulations" One immediate option to increase quality of installations would be to redefine the technical monitoring regime to include more quality of the installation questions. Under the current guidance, clause 15.24 states "Suppliers are expected to ensure that pass rates for technical monitoring (TM) are high, and work to improve the standard of installations". This is supported by clause 15.38 and 15.39 which state the methodology of improving standards. These clauses allow Ofgem to instigate actions with suppliers to increase quality of installations.

		The increased levels of TM, 15.38b, and other "appropriate action" 15.39, would have an immediate consequence to the installers in the supply chain as suppliers initiate a more rigorous approach. The results from the quality enhanced technical monitoring questions should be fed back to the accreditation body that has accredited that installer to PAS 2030. This feedback would be essential in creating an improvement loop. The accreditation body would then be ultimately, able to withdraw the PAS 2030 accreditation as a final sanction if no improvement is shown by repeat failures. We believe that such actions would actually have a greater effect on raising quality of installations rather than a building regulations approach. We would like to offer our experience and discuss with you the potential wider role of TM and how it could drive up the quality of installations.