

Response to Consultation Document –Changes to the Guidance for Suppliers - deccecoteam@decc.gov.uk

Response completed by – Nicola Vaughan, Director, City Energy South Wales Ltd, Green Deal Provider number GDPA221

Company Details – Coptic House, 4-5 Mount Stuart Square, Cardiff, CF10 5EE. Telephone number 02920 4991873

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Overview

City Energy South Wales Ltd is a certified Green Deal Provider with another Green Deal Provider (Enhance Energy Solutions Ltd). The responses to this consultation have been compiled primarily by the Operations and Compliance Director for both companies with input from staff employed by both companies. Both Providers have been involved heavily in the ECO since April of last year and our experiences during this time are represented in our answers.

1. New CERO primary measures: minimum insulation level to support a secondary measure.

Cavity wall insulation

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

1a: No.

1b: Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold)

1b: We disagree that 50% of “total” wall has to be insulated because of the wording when defining “Total” specifically “⁴” “This includes any external wall areas not suitable for insulation”. It would be in our opinion much fairer if it was 50% of area available to install. If you are installing as much insulation as you can under the measure we believe you should therefore be entitled to claim a secondary measure.

Roof-space insulation

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?

1c: Yes provided that it only applies to area in which insulation is viable, for example if you have a property with a pitched roof main building with a flat roof extension, if the extension took up over 50% of the total roof-space but 100% of the pitched roof was insulated you should still be able to claim it as a secondary measure.

1d: Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold).

1d: Reasons are given in answer 1c

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?

2a: Yes

2b: Are there any other scenarios where the exterior-facing wall area cannot be insulated?

2b: If property is timber framed it is currently unavailable to retrofit CWI insulation therefore would count towards being unable to insulate.

2c: How can suppliers demonstrate for compliance purposes that the exterior-facing wall area of a premises cannot be insulated?

2c: A Chartered Surveyor's report/photos would show why the wall would be unable to insulate.

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

2d: We don't think there are.

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

2e: A Chartered Surveyor's report/photos would show why the roof-space area would be unable to insulate.

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

2f: We don't feel that anything other than the reasons mentioned should affect the installation of Wall Insulation when installing a DHS.

For Premises, not including those within a multi-storey building which is not located on the top floor.

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?

2g: Yes

2h: Do you agree this minimum level should be set at 50%?

2h: Yes

3a: Do you agree with our proposal to require evidence that the installation of a measure complies with Building Regulations? Please give reasons for your answers.

3a: This should only be made mandatory if the organisations that can issue them for example CIGA/SWIGA can actually keep up with the volume of installs being sent to them. When the Energy Companies asked for their first batch of CIGA reference numbers many companies were still waiting on CIGA's from 6 months previous. Without having a reliable way of getting these we feel this should not be made mandatory.

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

3b: The only efficient way in our opinion to show compliance with this would be to either get every install that is technically monitored or by providing the proof of purchase including invoice from CIGA. Any other methods of showing this compliance would not be available to send through efficiently. This could be solved by setting up a guarantees database where OFGEM, the Energy Companies and provider could check that a property has had its guarantee purchased, much like the database that has been set up on Landmark for EPCs.

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)? If so, please provide details.

3c: No

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)? Please give reasons for your answer.

3d: We think it should be introduced for the next ECO obligation period. This is because it will cause less disruption for already contracted works, it will also allow everyone to plan ahead in being able to provide these documents.

4: Please provide any further comments on the changes to our DRAFT guidance document (version 1.2).

4: We have no further comments.