

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

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

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 cavity wall insulation must be applied to at least 50% of the total wall area to support a secondary measure.

Party wall cavity insulation should also be considered within Ofgem's ECO guidance for suppliers. Discussions between DECC, DCLG and BBA on party wall insulation retrofit as an approved measure are at an advanced stage and it is anticipated that formal approval will be given by the end of October 2014. Therefore this revision of the guidance should also anticipate the introduction of this new measure and be worded accordingly.

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

Setting a reasonable minimum of 50% will ensure that it is more practical to insulate as much of the wall as is possible but retains flexibility where reasonable restrictions apply.

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 the 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.

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

Setting a reasonable minimum of 50% will ensure it is more practical to insulate as much of the roof space as is possible but retains flexibility where reasonable restrictions apply.

Connections to a district heating system: pre-conditions under CERO and CSCO

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?

ROCKWOOL broadly agrees with the reasons proposed for judging why any of the roof-space or exterior-facing wall area cannot be insulated. More detail is needed on how an occupier/landlord's refusal would be evidenced. It does not seem reasonable that the relocation of white goods should form the basis of an acceptable refusal to insulate walls.

Party wall cavity insulation should also be considered within Ofgem's ECO guidance for suppliers. Discussions between DECC, DCLG and BBA on party wall insulation retrofit as an approved measure are at an advanced stage and it is anticipated that formal approval will be given by the end of October 2014. Therefore this revision of the guidance should also anticipate the introduction of this new measure and be worded accordingly.

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

Another scenario may be non-traditional building types for which no insulation system has been approved (and/or where no guarantee is available).

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

To maintain consistency with other administrative requirements, a Chartered Surveyor's report should be required as evidence.

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

No comment.

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

To maintain consistency with other administrative requirements, a Chartered Surveyor's report should be required as evidence.

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

No comment provided.

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 ROCKWOOL agrees that a DHS connection should be eligible where insulation has been installed to less than 100% of the building but where the remaining area cannot be insulated. This maintains consistency with the requirements proposed for primary measures.

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

Setting a reasonable minimum of 50% will ensure it is more practical to insulate as much of the roof space or total exterior-facing wall area as is possible but retains flexibility where reasonable restrictions apply.

Party wall cavity insulation should also be considered within Ofgem's ECO guidance for suppliers. Discussions between DECC, DCLG and BBA on party wall insulation retrofit as an approved measure are at an advanced stage and it is anticipated that formal approval will be given by the end of October 2014. Therefore this revision of the guidance should also anticipate the introduction of this new measure and be worded accordingly.

Compliance with building regulations: installation of a measure

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 answer.

Yes ROCKWOOL strongly agrees that evidence should be required that the installation of a measure complies with Building Regulations. Such a requirement will introduce more adequate consumer protection and will protect the reputation and public acceptance of energy efficiency measures.

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

Requiring that the installation be completed by PAS 2030 registered installers would be a simple and proportionate way of ensuring compliance. Where an installer is not PAS 2030 accredited, additional requirements such as approval under a recognised and relevant competent person's scheme or where an approval process and surveillance regime is in place as detailed in the technical approval for a measure.

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.

Independent accreditation of competent person's schemes by UKAS (or equivalent) would provide a high level of confidence in the validity and quality of a scheme.

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.

ROCKWOOL would support the introduction of the new requirements from the date version 1.2 of the guidance takes effect.

The consultation states that anecdotal evidence of poor quality measure installations has been received by Ofgem and has led to the proposals to strengthen the approach to ensuring measures comply with building regulations. We believe this assurance should be in place from as early a date as possible to prevent any further potential harm to the reputation and public acceptance of energy efficiency measures caused by poor quality installations.

General comments on our guidance

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

Clauses 4.63 and 4.64 both refer to the treatment of cavity walls with external wall insulation (EWI). While this may be an appropriate measure to install to achieve a reasonable U-Value for a narrow cavity, the cavity itself must nonetheless also be blocked or filled to prevent excessive heat loss due to the 'stack effect' within the construction. Further, ROCKWOOL believes that a CIGA or SWIGA guarantee (or equivalent guarantee accepted under ECO) for existing wall insulation should also be listed as an alternative to the evidence under 4.63. The eligibility requirements already listed will be difficult to obtain without invasive investigations.

The inclusion of 'standard' cavity wall insulation as a primary measure has led to both HTT and standard cavities being categorised together. It should be recognised within the guidance that the treatment of HTT cavities may be subject to additional technical requirements by ensuring that an appropriate guarantee for the category of HTT cavity that the wall falls under is required.