

Dear Sir/Madam,

Please see Elmhurst Energy Systems response to the ECO 2015-17 Consultation on Specific HHCRO Requirements:

Section 1.5

The first sentence: “Where any of the main space heating systems are fuelled by mains gas or district heating then the premises will not be considered to be non-gas fuels.” Is contradictory to the sentence below the 3 options “There may be more than one main space heating system in a premise. This test could be used in all cases to identify the main space heating system of a premise..”

We believe that the first sentence should be changed to “Where the main space heating system is fuelled by mains gas or district heating then the premises will not be considered to be non-gas fuels.” This would then align to the second sentence.

The rules:

Option A: is OK. But if a property has say an oil boiler and gas fires then by definition the property is not gas fuelled – is this the intention?

Option B: in our opinion is problematic. What happens when the property has a mixture of say of storage heaters and a fixed gas fire in the living room, which is fairly common. The storage heaters are defined as main heating and the fact there is mains gas to the property – this is ignored? The hot water may also come from a multi point, again as the property has fixed heaters the ‘gas’ is ignored.

Option C: this is OK – but doesn’t add to the rules.

The above rules seem to try and define a main heating system and if this happens not to be gas then the property is ‘non-gas fuelled’. If the intent is to truly identify any property where mains gas is not an option currently to heat a property, then you could simply follow the existing proven RdSAP and SAP rules, then in our opinion this section could be much easier. We suggest the following:

“As per RdSAP/SAP rules. If the Main Heating System 1 or Main Heating System 2, secondary heater or water heating does not use gas, or indeed if the property has ‘mains gas is available’ deselected – then the property is non gas fuelled”. The rules and conventions of RdSAP and SAP take care of how to identify all these options.

We trust this helps and we are happy to discuss and clarify this further if required.

Yours sincerely,

Stuart Fairlie
Business Analysis Manager