

Energy Company Obligation (ECO) 2015-2017: Consultation on specific HHCRO requirements

Response of Green Deal Consortia Ltd.

<p>1a.</p>	<p>Question</p> <p><i>Do you agree with our proposed test to identify the main space heating system of a premises? If not, can you suggest any alternative ways of identifying the main space heating system?</i></p>
	<p>Response</p> <p>The RdSAP conventions to identify main heating systems have been designed for this purpose. RdSAP already has conventions in place to handle the unusual situations that may come along, like two main heating systems, or no main heating system. Plus, RdSAP has been used for a few years now, so it has been market-tested and polished by use. This way, all one has to do is look at the Main Heating section of the table at the top of page 2 of an EPC to find out what the main heating system is and which fuel it uses. We do not want to see a completely new test for main heating systems that duplicates what already exists, which adds at least one layer of complication and another potential bottleneck/failure point.</p>
<p>1b.</p>	<p>Question</p> <p><i>Can you suggest any alternative ways that suppliers can demonstrate the fuel type of the main space heating system of a premises?</i></p>
	<p>Response</p> <p>As in our reply to 1a, the approach DEAs use to determine main space heating systems under RdSAP is robust but simple, familiar and accessible. Evidence should be supplied as well—a photograph of the main heating system to be replaced should also be included.</p>
<p>1c.</p>	<p>Question</p> <p><i>Do you agree that an accredited OCDEA/DEA should conduct the assessment of the fuel type of the main space heating system of the premises where a SAP or RdSAP calculation is used to demonstrate this?</i></p>
	<p>Response</p> <p>We agree. Also, as in our reply to question 1b, we also believe a photograph of the old heating system should be supplied as evidence. Just to be clear, we don't believe an OCDEA/DEA needs to be called out to perform a special assessment of the heating system alone. If no EPC exists, then the main heating system can be ascertained by the DEA at the time the EPC is produced. We also believe that the EPC used as evidence of the main heating system should be in RdSAP 9.91 or RdSAP 9.92.</p>

1d.	Question <i>Are there any other aspects relating to non-gas fuelled premises in ECO2 that you think we should consider?</i>
	Response One concern is the possibility that some installers may install new main heating systems, such as electric storage heaters, that are inadequate for the premises. Room heaters are different from gas boiler replacements, in that the heat generation and heat delivery systems are the same. There is an art to knowing which kinds of storage heaters to use and where to site them, and if this is not done correctly the carbon savings reported will not match the reality, and the household will not be no more comfortable than they were before the work.

2a.	Question <i>Do you agree with our proposal to use the boiler definition from Appendix 2 of the ECO Guidance? If not, can you suggest an alternative definition?</i>
	Response We agree.
2b.	Question <i>Do you agree with our definition of a heating system and the components a heating system comprises? If not, can you suggest an alternative definition?</i>
	Response We agree.
2c.	Question <i>Do you think that there are alternative ways to demonstrate that a qualifying warranty has been provided to the occupier?</i>
	Response If there are we do not think they would be better than the one proposed.
2d.	Question <i>Are there any other aspects relating to qualifying warranties for replacement boilers in ECO2 that you think we should consider, in particular the occupier declaration?</i>
	Response We would also like to see some language about the occupier being shown the correct way to operate the new system safely and effectively. Too often an installer will put the system in, leave the manual on the table and go. Heating systems are complicated, and correct operation is not always intuitive. It would be in the spirit of ECO if this language was added.

3a.	Question <i>Do you agree that the warranty should be for the functioning of the entire electric storage heater installed and that this can be demonstrated by a manufacturer's warranty?</i>
	Response We agree.
3b.	Question <i>If more than one electric storage heater is installed in the premises, do you agree that one warranty covering all of the replacement electric storage heaters is sufficient?</i>
	Response If that practice is typical in non-ECO installations, then we agree. If installers of electric storage heaters do not tend to issue umbrella warranties when multiple storage heaters are installed, but rather issue warranties for individual heaters only, then we disagree. In any case we would want to conform to the ordinary practice of the industry, rather than institute a different practice for ECO installations.
3c.	Question <i>Are there any other aspects relating to warranties for replacement electric storage heaters in ECO2 that you think we should consider?</i>
	Response No.