

ECO CONSULTATION ON SPECIFIC HHCRO REQUIREMENTS

SCOTTISH GOVERNMENT RESPONSE

Question 1

1a. Do you agree with our proposed test to identify the main space heating system of premises? If not, can you suggest any alternative ways of identifying the main space heating system?

Yes, it seems reasonable

1b. Can you suggest any alternative ways that suppliers can demonstrate the fuel type of the main space heating system of premises?

No.

1c. 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?

In theory, yes but the terms OCDEA and DEA do not apply in Scotland. This should therefore also include EPC assessors who are members of Approved Organisations who have entered into protocols with Scottish Ministers to deliver Energy Performance Certificates.

1.d. Are there any other aspects relating to non-gas fuelled premises in ECO2 that you think we should consider?

No.

Question 2

2.a. 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?

Yes, but we are keen to ensure that that fuel source does include bio-fuels e.g. wood chip, pellet and that, in the case of district heating, it includes the heat exchange unit which may be a replacement boiler.

2.b. 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?

Yes.

2c. Do you think that there are alternative ways to demonstrate that a qualifying warranty has been provided to the occupier?

No.

2d. 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?

Yes (see answer to question 2a.)

Question 3

3a. 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?

Yes but the replacement storage heater should only be a modern high output unit as per the new option included in the rdSAP 9.92 update.

3b. 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?

Yes.

3.c. Are there any other aspects relating to warranties for replacement electric storage heaters in ECO2 that you think we should consider?

No.