



Response to OFGEM
'Energy Company Obligation 2015-2017 (ECO2): ECO 2.2
Consultation'

Date: January 20th 2015

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(for and on behalf of Elmhurst Energy Systems Ltd)



Elmhurst Energy Systems Ltd

Response to:

OFGEM

“Energy Company Obligation 2015-2017 (ECO2): ECO 2.2 Consultation”

Consultation Responses:

1. Roof Insulation:
 - a. OK
 - b. No further comments

2. Cavities:
 - a. No comment
 - b. No we do not agree with this statement. There may well be a concern about moisture/damp problems. But already in ECO there are other improvements where proportions of solid wall and cavity walls can be insulated whilst certain areas remain unable to insulate. Therefore there is not consistent logic on this measure.
 - c. No comment
 - d. No comment
 - e. No further comments

3. Lifetime of multi-fuel:
 - a. Yes we agree that Option 1 is simple and relatively easy to follow
 - b. If not option 1 then suggest Option 3 as the next best alternative. We believe this would make installers fit durable and long life systems/equipment
 - c. No further comments

4. Qualifying Electric Storage Heaters:
 - a. The definition is very high level. We suggests that the reasons why it is not working need to be better defined and made much clearer i.e. is it the controls/supply/fuse/ the storage heater itself that is not working. Also how this should be tested/verified that it is not working needs better clarification. Can a storage heater be checked in an on peak period? can it be checked in the summer? Etc
 - b. Yes we agree to this approach it seems reasonable
 - c. No comment
 - d. Modelling for the option of repairing or replacing one (or some) storage heater in SAP/RdSAP is complicated, but it is possible in some cases but not all.
 - SAP/RdSAP only allows two main heating systems and one secondary heating system.
 - Storage heaters can only be entered as one of the two main systems.
 - Hence for modelling purposes if you exceed two main systems it is not possible to model in SAP/RdSAP: an example would be gas boiler serving downstairs and storage upstairs with electric direct acting panel heaters as secondary. To remodel this with a scenario of replacing one storage heater would mean that you would need four options main heating system 1: gas boiler, main heating system 2: existing storage, main heating system 3: new storage heater (which is not an option in SAP/RdSAP) and secondary heating system: direct acting electric.

- If the original property only had main heating system 1: storage heaters and secondary heating system: direct acting then changing one heater could be accommodated by adding in main heating system 2: new storage and fractioning the heat demand.
- Another example that doesn't work in RdSAP/SAP is where there are existing 10 storage heaters and 1 is broken. The baseline combination would be need to be Main heating system 1: existing storage heaters with 90% coverage, Main heating system 2: 'No heating' with 10% coverage. However 'no heating' option in RdSAP has to be 100% coverage, therefore the software can't model the baseline
- During discussions around the consultation we think the industry may have misunderstood the use of Habitable and Heated rooms within RdSAP- this is used to decide which heating system is the main 1, main 2 or secondary. A single storage heater in a non habitable room would possibly in most combinations be ignored by assessors, due the hierarchy of choosing the heating systems following the guidance in SAP; however it would be accounted for in some simple combinations, but this needs further thought.
- At this moment in time we cannot see how you can consistently model the replacement of one (or some) storage heater(s) in SAP/RdSAP. It would work in simple properties but not in all properties with a mix of heating systems as indicated in some of our examples above.
- Our suggestions is to create a specification for the approved ECO calculator tools that caters for this measure - considering number, location and respective efficiencies or a storage heater "system". This will require some work and clear technical specifications/test cases issued by the BRE. This was debated at a recent Green Deal and ECO Technical Steering Group (TSG) and all the parties are willing to help to get to a resolution.
- Finally, if the property in question has a mains gas available e.g. a gas multi-point water heater or a gas fire, this ECO measure doesn't seem to suggest that a new gas condensing boiler heating system should be suggested as per the EPC recommendations. We believe if all storage heaters are to be replaced then this would be a better solution in terms of carbon and cost for the property. If only one storage heater is to be fixed then fair enough, but if the whole property heating is to be changed then the alternative gas is a better option.

5. Qualifying Boilers:

- a. No comment
- b. No comment
- c. No comment
- d. No further comments

6. Virgin Loft Insulation:

- a. We believe the approach will help, but not sure of the effectiveness of it.
- b. If a homeowner/landlord is told that in order to get the roof insulation for 'free' then they should "sign here" and the salesperson indicates that the original

insulation needs to be taken away as it is poor/rubbish – homeowners/landlords will sign anyway!

- c. The fact that a qualified OCDEA/DEA undertakes EPCs does give a moderation of third party verification. It is of course possible to increase the scope of energy assessors; so that if they are instructed to produce an EPC for ECO purposes and they suspect that loft insulation has been removed they could flag this to an appropriate body. Further investigation can then take place by simply checking historic EPCs lodged for the property on the national registers.
- d. This seems to be consistent with other areas of ECO e.g. broken boilers. So effectively removing a ‘non functioning’ product with a good new product. We assume the risks identified include items such as vermin infestation, fire risks, sodden/damp insulation etc.

7. Technical Monitoring:

- a. Yes we agree. There are two different skill sets required. It is possible that one individual has both skill sets – but not always.
- b.
 - i. We agree with the re-active monitoring. From our experience the quarterly approach is correct and is relatively easy to administrate. It also attempts to stop issues building up in a relatively timely manner.
 - ii. Our general comment is that the three levels may be too complicated to administrate and resource for. Possible two levels (baseline and increased) would be easier and more consistent to enforce in reality. From our experience in EPBD which works on two levels is relatively straight forward to administrate.
- c. No comment
- d. We agree with the type of qualifications. However an OCDEA would not be appropriately qualified or competent to check RdSAP surveys. And vice versa a DEA would not be qualified or be competent to check SAP or U-value calculations. Furthermore we would welcome an ECO Competency Test/Qualification so that consistency of use of Approved ECO Software tools was ensured. This would help not only consistency but add value to the Approved ECO Tools which help the industry obtain better quality.
- e. No comment
- f.
 - i. The ‘Technical Monitoring Questions’ Guidance (for score monitoring) is OK – but should be updated to mention SAP2012 and RdSAP v 9.92. Please note it should always be aligned to SAP/RdSAP auditing/conventions so as not to have different standards. i.e. floor area variations of 10% - would not necessarily mean an error of +/- 5 SAP points for EPBD purposes, therefore the EPC is not incorrect.
 - ii. In relation to point “1.35 appendix 1”: The normal process in EPBD in that a problem with an EPC is flagged with the energy assessor in the first instance. If they can’t reach a resolution then this can be raised to the appropriate Accreditation Body. However if installers/providers have a consistent issue with EPCs our advice is to go to the Accreditation Body.

Conclusion:

We trust the above is helpful and constructive and if there are any clarifications required please do not hesitate to contact us.

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