

Glasgow City Council's Response

Energy Company Obligation 2015-2017 (ECO2)

ECO2.2 Consultation

Pre Existing roof insulation requirements Pre-conditions for DHS under CERO & CSCO

Question 1:

- a) Do you agree with our proposed requirements for pre-existing roof insulation? Please provide reasons for your answer.

Glasgow City Council agrees with the proposed requirements for pre-existing roof insulation. Only in exceptional circumstances, where the requirement to reach the target u-value is not reasonably practicable or technically/financially viable, should an exemption be granted.

- b) Do you have any further comments or suggestions relating to this policy area?

N/A

Cavities which cannot be insulated: Pre-conditions for DHS under CERO & CSCO

Question 2:

- a) Do you agree with our proposal that a wall with a section of cavity narrower than 40mm cannot be insulated? Please provide reasons for your answer

Glasgow City Council agrees technical issues outweigh the benefits of increasing the thermal capacity of the wall.

- b) Do you agree with our proposal that a wall which adjoins a wall which cannot be insulated also 'cannot be insulated'? Please provide reasons for your answer.

Glasgow City Council agrees with the proposal, individual walls should not be treated in isolation to the rest of the property.

- c) Are there any other scenarios where a cavity wall cannot be insulated? Please provide reasons for your answer.

There are a number of house types within Glasgow City Council e.g. pre 1919 stock, timber framed, and non traditional properties where cavity wall insulation is not appropriate. One such non traditional house type is Wilson Block construction which is clinker concrete walling slabs, each slab is separated by a 76mm cavity.

- d) For compliance purposes, how can suppliers demonstrate that a cavity wall cannot be insulated?

Glasgow City Council would expect Suppliers to demonstrate the suitability or not by carrying out investigative works including technical surveys and borescope inspections.

- e) Do you have any further comments or suggestions relating to this policy area?

N/A

Calculating the lifetime for multi-fuel upgrades of existing DHS connections

Question 3:

- a) Do you agree with our preferred approach (Option 1) for calculating the lifetime for multi-fuel DHS upgrades? Please provide reasons for your answer.

Glasgow City Council agrees with the approach outlined in Option 1

- b) If you do not agree with Option 1, do you agree with any of the other proposed options for calculating the lifetime for multi-fuel upgrades? If not, can you propose an alternative approach for calculating the lifetime for multi-fuel DHS upgrades?

N/A

- c) Do you have any further comments or suggestions relating to this policy area?

N/A

Qualifying electric storage heaters

Question 4:

- a) Do you agree with our proposed definition of a 'broken down' ESH? Please give reasons for your answer.

Glasgow City Council would prefer the definition of 'broken down' ESH to be when it is unable to store heat

- b) Do you agree with our proposal for judging that an ESH cannot be economically repaired? Please give reasons for your answer.

Glasgow City Council agrees with the proposal (4.8a) for judging that an ESH cannot be economically repaired. Item (4.8b) where the responsiveness rating of the ESH is more than 0.2 the additional criteria outlined may create an Urban/Rural replacement/ repair issue based more on costs and less on performance depending on location.

- c) Do you agree with the thresholds given in the ESH Economic Repair Cost Comparison Table? Please give reasons for your answer.

N/A

- d) Do you have any further comments or suggestions relating to this policy area?

N/A

Qualifying Boilers: Not Functioning efficiently

Question 5:

- a) Do you agree that 'boiler and system sludge' and 'unstable firing' alone are insufficient reasons for a boiler to be replaced? Are there any other faults which on their own are insufficient reasons for a boiler to be replaced? Please give reasons for your answers.

Glasgow City Council does not think boiler and system sludge" and "unstable firing" should be excluded, but should come with a proviso that if all attempts to repair the boiler fail or proves too costly to repair, it should be replaced. If the boiler is not functioning efficiently it should be replaced.

- b) Do you agree that 'no boiler ignition' and 'unstable firing' should be considered separately? Please give reasons for your answers.

Glasgow City Council agrees that "no boiler ignition" and "unstable firing" should be considered separately. As stated in the above response, "unstable firing" should be considered as a criteria for boiler replacement, but under a proviso. Having the two terms listed separately should make this process easier.

- c) Do you agree that the boiler fault list is suitable to identify faults with non-gas fuelled boilers? Please give reasons for your answers.

N/A

- d) Do you have any further comments or suggestions relating to this policy area?

N/A

Virgin Loft Insulation: New Requirements

Question 6:

- a) Do you think the proposed changes to our requirements will be effective in reducing false claims of virgin loft insulation? Please provide reasons for your answer in relation to each change.

Glasgow City Council does not agree the proposed changes to the requirement would be effective in reducing false claims of virgin loft insulation.

Potential Issues relating to each proposed change:-

6.5 1 The loft hatch key may not always be available at the time of inspection particularly in flatted properties. Access issues to flat roofed properties with a new pitched roof could also be problematic

6.5 2. Occupier and/or landlord may not have accessed the loft space and therefore be unwilling to sign a declaration.

6.5 3. As above (6.5.2) the customer may not be aware of the existing insulation levels.

6.5 4. A pre installation inspection regime would be the most appropriate however this should not delay installation works.

- b) Do you see any difficulties in implementing these changes? Please provide reasons for your answer.

Glasgow City Council envisages difficulties in implementing these changes as outlined above.

- c) Do you have any suggestions for other controls or requirements we could introduce to reduce or prevent such false claims? Please provide reasons for your answer.

Photographic evidence containing a date prior to installation date

- d) Where existing insulation is removed because it is posing health and safety risks and new insulation installed, should the measure be claimed as virgin or top-up loft insulation? Can you provide examples of health and safety risks that would require insulation to be removed and how a supplier could demonstrate these risks?

Glasgow City Council would support the measure being claimed as a virgin loft.

Some examples of H&S risks requiring the removal of insulation includes:-

Birds/Rodents infestation

Flood damage

Fire damage

Technical Monitoring Process: Revisions

Question 7: (NB: Please see Appendix 1 before answering any of the below questions)

- a) Do you agree it is more appropriate to assess quality of installation and the accuracy of scores separately?

Glasgow City Council agrees it is more appropriate to assess quality of installation and accuracy of scores separately

- b) Do you agree with the proposed reactive monitoring process described in paragraphs 1.45 to 1.56 of Appendix 1? Do you think the monitoring rates are appropriate?

Glasgow City Council agrees with the proposed reactive monitoring process, the monitoring rates are appropriate.

- c) Do you agree that technical monitoring agents should have certain qualifications as explained in paragraph 1.15 of Appendix 1? Can you suggest which qualifications are most appropriate for different categories of measure?

Glasgow City Council agrees technical monitoring agents should hold qualifications related to the measure being assessed. Monitoring agents should register with PAS 2030 detailing their technical competency to assess a particular measure they should not be expected to become full members of the scheme.

- d) Are the qualifications listed in paragraph 1.16 of Appendix 1 appropriate for score monitoring agents? Are there any other qualifications that you would suggest?

Glasgow City Council agrees the qualifications listed are appropriate.

- e) Do you agree with the proposed timescales for remedial works and re-scoring to be conducted outlined in paragraphs 1.58 and 1.59 of Appendix 1?

Glasgow City Council agrees with the proposed timescales

- f) Do you have any further comments or suggestions relating to this policy area?

N/A