

## Question 1

1.1 Do you agree that the default lifetime for wall insulation measures without an appropriate guarantee is 0 years?

1.2 Please give reasons for your answer.

E.ON agree that in principle awarding a default lifetime of 0 years for wall measures which have been identified as not having an appropriate guarantee in place could drive best practice behaviour within the supply chain to ensure that all installers are properly applying for appropriate guarantees for wall measures installed.

However, before any change to ECO2 to apply this default value is implemented, Ofgem should assure itself that that main Guarantee Agencies are applying best practice themselves, and that the quality frameworks implemented by the Guarantee Agencies support these proposed changes.

For example, under Scenario 2, one of the reasons given as to why a wall measure might be awarded a default lifetime is that the guarantee has not been issued as it has been applied for retrospectively.

Whilst the main cavity wall insulation Guarantee Agency issues best practice guidelines to installers stating that a guarantee should be applied for within one month of installation, we are not aware of any guidance regarding the timescales for applying for a guarantee from any of the other main Guarantee Agencies.

However, we are aware of instances where both the main cavity and solid wall insulation Guarantee Agencies have issued guarantees several months after the installation of the wall measure.

This suggests that one of the details given in Scenario 2 as to why a guarantee has not been issued is not actually true, and that the main guarantee agencies will issue guarantees at any time after the date of installation.

For this reason, before a default lifetime value is applied, suppliers should be given that opportunity to rectify the lack of guarantee by engaging with the installer to a) ensure that a guarantee is applied for and issued as a matter of urgency, and b) to understand the reason why the guarantee was not applied for in the first place, and to identify if there are any systematic or process issues that have prevented the installer from applying for the guarantee.

In instances such as these, Ofgem should allow suppliers to present evidence to support the lifetime in the same way as for Scenarios 3 & 4, and be assessed on a case-by-case basis.

## Question 2

2.1 Where there is alternative assurance available in support of the lifetime, do you agree that we should determine the lifetime through a case-by-case assessment of the evidence, up to a maximum of the standard lifetime for that measure type?

2.2 Please give reasons for your answer.

In cases where there is alternative assurance available, E.ON agrees that Ofgem should determine the lifetime through a case-by-case assessment of the evidence.

This will enable both suppliers and their supply chain to understand if there are any systematic issues within their end to end processes which have prevented a guarantee being applied for.

Ofgem should allow suppliers to provide a broad range of supporting evidence and not discount any information before assessment.

In addition to the points above, it must be acknowledged by Ofgem that the introduction of this change, irrespective of the volume of measures affected, will add considerable administrative burden to the scheme due to the cumbersome and time consuming measure change process in place.

### Question 3

3.1 Do you consider that an alternative approach would be more appropriate in determining the lifetime for wall insulation measures without an appropriate guarantee?

3.2 If yes, please provide details.

E.ON does not consider that any specific alternative approach be more appropriate in determining the lifetime. However we do believe that Ofgem should be open to as broad range of possible alternatives as available at the time.

#### **4.1 Do you agree that in some circumstances, remote re-inspections are appropriate?**

Yes, E.ON and our TM Agents (THS, Llewellyn Smith and GDR Surveyors) agree that it is suitable for remote reinspections to take place in some circumstances.

#### **4.2 Please give reasons for your answer.**

**E.ON** believes that appropriate photographs of the fail and subsequent remedial can be seen clearly using modern digital cameras. And for certain document fails e.g. competency cards a photograph of the crew on site can be compared to a competency card emailed through.

**E.ON** suggests that there is the need for a clear set of robust guidance rules defined by Ofgem, installers, TM Agents and obligated suppliers to ensure this was objectively determined decision rather than the subjective view of a TM Agent.

**E.ON** would propose that it possible for Installers to provide photographic evidence to overturn failures identified at first inspection as the processes would be in keeping with the principles laid out in this consultation.

For C2 inspections we would suggest a “security mark” is left by the TM agent to ensure we are seeing this area in the remediation photographs and not that of generic repair from another property.

For Safety fails these should always be reinspection in person by the original TM agent.

**GDR Surveyors**

“Remote re-inspections would be a suitable alternative in many instances where the failures are due to installation errors. Many of the installation errors can be seen clearly from photographic evidence and as such could be re-inspected remotely providing the correct evidence is provided.”

**THS**

“We believe that there are circumstances where a visit is not required. For example C2 failures on EWI such as boarding issues that cannot be rectified while the inspector is on site (due for example to materials not being available at the time). A remote inspection in this case should be acceptable. However, this method should NEVER be permitted where any safety related failures are concerned for any measure.”

**Llewellyn Smith**

“We have identified in Appendix 1, copy attached, which questions we feel are appropriate for remote re-inspections as the nature of the fail and the remediated works can be evidenced through before and after photographs. This may be supplemented with further evidence, which will comment on in our answer to question 6.4.”

**5.1 Do you agree that it may be possible to remotely re-inspect the technical monitoring failure types we suggest in Appendix 1?**

**E.ON** Yes, these are highlighted in Appendix 1

**Llewellyn Smith**

“We have also identified a further five questions where we believe that remote re-inspection would be appropriate, for the remainder we agree with Ofgem’s view.”

**5.2 Please give reasons for your answer.**

Please see supporting Excel spreadsheet detailing E.ON’s and THS response to this question

**GDR Surveyors**

“We agree that the failure types suggested in Appendix 1 are suitable for remote re-inspection as visual evidence can be provided to demonstrate that an issue has been remediated. Providing the evidence is demonstrated in line with the proposed process we don’t foresee there being a problem with remote re-inspection of those questions.”

**Llewellyn Smith**

“We believe that for straightforward quantifiable questions/failures, that photographs pre and post remediation are appropriate to determine the rectification of the failure. For the additional five questions that we believe are a “Yes”, we have added specific comments in Appendix 1.”

**5.3 Please identify those questions in Appendix 1 where you disagree with the proposal.**

Please see supporting Excel spreadsheet detailing E.ON’s, THS’ and Llewellyn Smith’s response to this question.

**5.4 Please identify any other questions where you consider the proposal would be appropriate.**

Please see supporting Excel spreadsheet detailing E.ON’s and Llewellyn Smith’s response to this question. Only ourselves and Llewellyn Smith have identified further questions which would be suitable for remote reinspection.

**Llewellyn Smith**

“These are identified in Appendix 1 as DP1, EWI.13, LITU.1, LIV.1 and LIV.6.”

**6.1 Do you agree that technical monitoring fails can only be re-inspected remotely in cases where the technical monitoring agent has deemed it possible during their original inspection?**

**E.ON** agrees that the viability of a remote reinspection should be made at the original inspection, as this gives a level of assurance that it is practicable to do so. The key thing to note is it's the TM agent's reputation on the line here in determining if a remote inspection is possible and suitable.

We suggest the need for a clear set of robust guidance rules defined by Ofgem, installers, TM Agents and obligated suppliers to ensure this was objectively determined decision rather than the subjective view of a TM Agent.

**GDR Surveyors**

"No, I don't think it is necessary for the technical monitoring agent to stipulate whether the measure can be remotely re-inspected during the original inspection. This decision can be made when remedial evidence is provided. If the evidence is suitable and correlates with the existing evidence then a remote re-inspection can be undertaken, failing this a site visit would have to be completed."

**Llewellyn Smith**

"We agree that the remote re-inspection should be determined by the technical monitoring inspector at the original inspection.

Ofgem should add a further question asking "Is a remote re-inspection suitable after remediation of the failure?" with a yes or no response."

**6.2 Do you agree that remote re-inspections must be conducted using photographs taken before and after remedial works, and that original photographs must be taken by the monitoring agent during their original inspection?**

**E.ON** Yes it is appropriate to see the before and after photographs to support and evidence the remedial actions

**THS**

"Yes"

**GDR Surveyors**

"We agree that to accurately support remote re-inspections you require photographs taken by the technical monitoring agent initially to record the failure and then the installer to demonstrate the remedial works have been completed."

**Llewellyn Smith**

"Yes, we agree that photographs must be taken before and after remediation of the failure. We take photographs of failures where appropriate and agree that this should be the case."

### **6.3 Do you agree that the photographs need to be GPS location-stamped?**

**E.ON**, no this would add unnecessary cost to the process while TM agents source and update equipment and in the end this cost will be passed through the supply chain to customers. Fraud can also occur on this form of tagging as it can with date and time stamps

#### **GDR surveyors**

“Yes, GPS Stamped photographs would further support the photographic evidence provided by both the technical monitoring agent and the installer carrying out the remedial works.

#### **Llewellyn smith**

“We are confirming with our software provider to determine whether a GPS location stamp is practicable.

Our photographs are embedded into the report and it may be that the whole report has a GPS location stamp.”

#### **THS**

“No. A Time and date stamp should be sufficient. Adding GPS location would be adding additional costs for both Installers and TMA's which would be passed on the utility and ultimately the end customer. GPS stamp fraud can occur in the same way that date and time stamp can occur.”

### **6.4 Do you agree that the technical monitoring agent should be able to request additional evidence to assist with the remote re-inspection? If so, please provide examples of suitable evidence.**

**E.ON**, we would point you to the responses of TM agents

#### **THS**

“Yes. They may require evidence of the competency of the individual undertaking the remedial. As they are not on site at the time of the remedial they do not have an opportunity to obtain sight of the contractor’s competency card.”

#### **GDR surveyors**

“In some cases additional evidence would be required and this should be able to be requested. The evidence could be in the form of other photographic evidence or a signed declaration from the customer to confirm they have completed the remedial works and that they are happy with the works.”

#### **Llewellyn Smith**

“We do agree that the technical monitoring agent should be able to ask for additional evidence to assist the remote re-inspection, such as the BBA certificate for the cavity wall insulation questions CWI.4, PWI.1 and PWI.2.

With reference to question LITU.4, loft insulation loft hatch insulation, confirmation of the insulation product that has been used may be required, if it is not the encapsulated mineral wool that has been used for the general loft space.”

**6.5 Do you agree that the remote re-inspection should be conducted by the same agent who conducted the original site audit?**

**E.ON**, yes as this ensures a more consistent and robust customer experience

**THS**

“Yes. It must be in order to deliver consistency and ensure that the images align with the actual remedial.”

**GDR Surveyors**

“We agree that remote re-inspection should be undertaken by the same agent who conducted the original inspection as this ensures that evidence provided is correct and for the same property.”

**Llewellyn Smith**

“We agree that the same technical monitoring agent i.e. the company should carry out the original inspection and the remote re-inspection.

However, this would be by a different inspector as this is a desktop exercise and the original inspection is a field based exercise. For both the field and desktop operations to work efficiently, there needs to be this flexibility of approach.”

**6.6 Do you agree that the technical monitoring agent must conduct a site audit if there is any doubt in the evidence assessed during the remote re-inspection?**

**E.ON** yes this is the only practicable solution if installers cannot satisfy the TM agent or there is an element of doubt, especially with safety fails for example combustion vents.

**THS**  
“yes”

**GDR Surveyors**

“If the technical monitoring agent is not completely satisfied that the remedial works have been completed to the appropriate standard then a site inspection must be undertaken.”

**Llewellyn Smith**

“Yes, we agree that the technical monitoring agent must be able to insist upon a site re-inspection if he/she has any doubt over the validity of the evidence produced for the remote re-inspection. “

**6.7 Do you think that monitoring agents should monitor a minimum percentage of re-inspections on site? If so, what is an appropriate percentage?**

**E.ON** No, this would create another TM target to hit alongside the 5% per measure, and 3 % per installer and could lead to further increases in complexity for no real gain. There should be no need to monitor reinspections if TM agents are confident in their professional integrity and competence to deliver these remotely in the first place.

If there is a concern that TM agents are unable to deliver this through remote reinspections, it would be prudent not to introduce this reinspection approach at all.

**THS**  
“No”

**GDR Surveyors**

“A minimum amount of re-inspections should be conducted using on-site visits. We would suggest that a third of all re-inspection should be completed on site to ensure that quality and compliance levels are maintained across all technical monitoring.”

**Llewellyn Smith**

“Yes. If the questions in Appendix 1 are agreed as to which are appropriate for remote re-inspections, then the failure types will determine the percentages of re-inspections on site and remotely.

However, there does need to be a certain level of site re-inspection to ensure the robust nature of the remediation process.

The minimum percentage of remote classified inspections that are inspected on site should be 20%.



**6.8 Please provide any further suggestions for processes that may increase the accuracy of remote re-inspections, or enhance consumer protections.**

**E.ON** would suggest that remote reinspection is completed at C2 stage only, and that appropriate evidence is provided by the remediating installer to allow the TM agent to make a competent decision based on this evidence.

Clear and robust evidence guidelines need to be provided by Ofgem in conjunction with the TM agents and installers to remove any doubt in the C2 remote re-inspection process and avoid further significant inconvenience to a customer as a lack of evidence could lead to detailed invasive works being required.

For example, a damaged board on EWI that has not been evidenced as repaired and the job is now complete, could lead to the this section of EWI being 'cut-out' and a larger section replaced and refinished. This has further time and quality issues for the installer and customer.

For further comments see responses from TM agents below:

**THS**

"For examples such as that given in 4.2 where an EWI mid-installation had failed, but the materials were not available on site to rectify, an Inspector could use a spray can or marker pen to mark the wall area where the fault occurred with a unique symbol and date and time. When rectified the contractor could take a photograph of the same area showing the unique symbol applied by the inspector."

**Llewellyn Smith**

"The evidence that the installer collates upon completing the remedial works could include a customer signed declaration that the remediated works have been completed. This would enhance the customer's perception of being part of the compliance process. It would still lie with the technical monitoring agent to determine that the photographs provide the evidence for a pass."

**GDR surveyors**

"We believe that the suggested process would be suitable and sufficient to accurately complete technical monitoring re-inspections."

## **7.1 Please estimate the time that could be saved by these proposals?**

**E.ON** believes this would add a level of additional cost to the process. This is because a TM agent has to review the evidence received and potentially then complete a physical reinspection due to a lack of evidence.

There are also many examples seen in the quarterly reports submitted to Ofgem of jobs with multiple fails for installation, safety, best practice and/or scoring reasons. Where these cannot be resolved with remote evidence a physical reinspection would still be required.

### **Llewellyn Smith**

“Of the inspections that are conducted remotely, this could save 10-15 minutes per re-inspection. This is a best estimate, as the administration element of the remote re-inspection would involve web based platforms that would need to be accessed. This would need to be compared with a site re-inspection which is very specific in its remit although there has been an element of travel time to factor in.”

### **THS**

“It is difficult to put a generic time saving against these proposals. The only time saving relates to the end to end lifetime of the job which largely depends upon the time taken to re-mediate and communicate the completed remedial back to the utility and TMA rather than the time to re-visit the property.”

### **GDR Surveyors**

“A re-inspection of a measure can take anything up to half an hour not including travelling to the property so completing re-inspection could save approximately 1 hour per inspection.”