

Llewellyn Smith Limited, John Whitefield

Ofgem, ECO2 Technical Requirements Consultation

Publication dated 30 October 2015, response deadline 30 November 2015

Consultation Response.

| Question/ clause | Text from the Consultation | Llewellyn Smith Comments |
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| Q4.1 | Do you agree that in some circumstances, remote re-inspections are appropriate? | Yes. |
| Q4.2 | Please give reasons for your answer. | 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. |
| Q5.1 | Do you agree that it may be possible to remotely re-inspect the technical monitoring failure types we suggest in Appendix 1? | Yes. We have also identified a further four questions where we believe that remote re-inspection would be appropriate, for the remainder we agree with Ofgem's view. |
| Q5.2 | Please give reasons for your answer. | 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. |
| Q5.3 | Please identify those questions in Appendix 1 where you disagree with the proposal. | We have identified these in Appendix 1. |
| Q5.4 | Please identify any other questions where you consider the proposal would be appropriate. | These are identified in Appendix 1 as DP1, EWI.13, LITU.1 and LIV.1. |
| Q6.1 | 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? | Yes. 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. |

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| Q6.2 | <p>Do you agree that the 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?</p> | <p>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.</p> |
| Q6.3 | <p>Do you agree that the photographs need to be GPS location-stamped?</p> | <p>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.</p> |
| Q6.4 | <p>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.</p> | <p>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.</p> |
| Q6.5 | <p>Do you agree that the remote re-inspection should be conducted by the same agent who conducted the original site audit?</p> | <p>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.</p> |
| Q6.6 | <p>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?</p> | <p>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.</p> |
| Q6.7 | <p>Do you think that monitoring agents should monitor a minimum percentage of re-inspections on site? If so what is an appropriate percentage?</p> | <p>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%.</p> |
| Q6.8 | <p>Please provide any further suggestions for processes that may increase the accuracy of remote re-inspections, or enhance consumer protections.</p> | <p>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</p> |

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| | | <p>technical monitoring agent to determine that the photographs provide the evidence for a pass.</p> |
| <p>Q7.1</p> | <p>Please estimate the time that could be saved by these proposals?</p> | <p>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.</p> |