

Ofgem – ECO2 Technical Requirements Consultation – SSE Response

Lifetime for Wall Insulation Measures Without an Appropriate Guarantee

Question 1 - Do you agree that the default lifetime for wall insulation measures without an appropriate guarantee is 0 years?

Yes we agree the default lifetime for wall insulation measures without an appropriate guarantee should be 0 years as this will provide a clear message that guarantees must be provided.

If this is the approach taken by Ofgem , it will be necessary to clarify what happens to a measure that meets all the ECO2 criteria and yet receives no ECO savings. Our preference is for measures with zero savings to be rejected by Ofgem, otherwise they would still contribute to technical monitoring requirements.

Question 2 - 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?

No we do not believe it is appropriate to allow alternative means of providing assurance through case-by-case assessment of the evidence. This would lead to uncertainty and protracted discussions between installers, suppliers and Ofgem to determine the lifetime for a measure. Furthermore it is difficult to think of a scenario where an appropriate guarantee could not be provided and yet it would still be appropriate to install a measure.

Question 3 - Do you consider that an alternative approach would be more appropriate in determining the lifetime for wall insulation measures without an appropriate guarantee?

No, for the reasons given in our response to questions 1 and 2 we do not believe an alternative approach would be more appropriate in determining the lifetime for wall insulation measures without an appropriate guarantee.

Technical Monitoring Re-inspections

Question 4 - Do you agree that in some circumstances, remote re-inspections are appropriate?

Yes we agree with the principle of remote re-inspections as they could help to reduce costs and reduce inconvenience for customers. They should only be considered for circumstances where a remote re-inspection can provide the same level of certainty as an on site re-inspection.

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

Ref	Question	SSE Comment
BR.1	Where a boiler and hot water storage vessel have been repaired or replaced, have any associated replacement pipes or pipes that have been exposed as part of the works or are now otherwise accessible been insulated where possible?	Yes we agree this question can be remotely re-inspected
NB.1	Where a boiler and hot water storage vessel have been repaired or replaced, have any associated replacement pipes or pipes that have been exposed as part of the works or are now otherwise accessible been insulated where possible?	Yes we agree this question can be remotely re-inspected
NB.2	If holes or openings have been made through the fabric of the premises due to the installation of a new boiler, have they been made good? (including condensate pipe, pressure relief valve, gas flue terminals) ?	Yes we agree this question can be remotely re-inspected
CWI.4	Does the drilling pattern conform to the appropriate materials compliance certificate?	No we do not believe it is possible to easily assess drilling patterns from photographic evidence and these failures should be re-inspected by a site survey. This is because filled injection holes can be very difficult to see on a photograph.
CWI.5	Have all injection holes been filled?	Yes we agree these can be remotely re-inspected, with the proviso that each hole should be individually photographed and must be identifiable.
WG.1	Have all windows and doors in the premises that haven't been treated before now been treated?	Yes we agree this question can be remotely re-inspected
IWI.7	Is the insulation sealed around all adjoining boards, walls, ceilings and floors?	Yes we agree there could be instances where this type of failure can be remotely re-inspected. However we are also concerned that where the quality of sealing is generally poor then it would be more appropriate for a second site visit. The decision for the appropriateness of remote re-inspections should be decided on a case-by-case basis and should be at the discretion of the technical monitoring surveyor.
LITU.2	Has insulation been close butted?	No we do not think it is appropriate for loft insulation fails to be remotely re-inspected, this is for two reasons. Firstly because photographs of loft insulation are often poor and difficult to interpret. Secondly because there is a risk of failures being remediated by moving insulation around in the loft which can create new failures. For these reasons we believe a site visit is appropriate.
LITU.3	Has insulation been cross laid to prevent cold	No – please see response to LITU.2

	bridging?	
LITU.4	Has the loft hatch been insulated as specified in PAS 2030:2014?	Yes we agree this question can be remotely re-inspected
LITU.5	Has the loft hatch been draught proofed as specified in PAS 2030:2014?	Yes we agree this question can be remotely re-inspected
LIV.2	Has insulation been close butted?	No – please see response to LITU.2
LIV.3	Has insulation been cross laid to prevent cold bridging?	No – please see response to LITU.2
LIV.4	Has the loft hatch been insulated as specified in PAS 2030:2014?	Yes we agree this question can be remotely re-inspected
LIV.5	Has the loft hatch been draught proofed as specified in PAS 2030:2014?	Yes we agree this question can be remotely re-inspected
PWI.1	Does the drilling pattern conform to the appropriate materials compliance certificate?	No , we do not agree this question can be remotely re-inspected. This is because it is a mid-installation inspection question, which could be difficult to verify with a post installation photograph.
PWI.2	Does the lancing pattern conform to the appropriate materials compliance certificate?	No , we do not agree this question can be remotely re-inspected. This is because it is a mid-installation inspection question, which could be difficult to verify with a post installation photograph.
PWI.3	Have all party cavity walls been insulated?	No , we do not agree this question can be remotely re-inspected. This is because it is a mid-installation inspection question, which could be difficult to verify with a post installation photograph.

Question 5.2 - Please give reasons for your answer. – see table above

Question 5.3 - Please identify those questions in Appendix 1 where you disagree with the proposal. – see table above

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

We think it is appropriate for the following additional questions to be remotely re-inspected:

Ref	Question	SSE Comment
EWI.1	Is there at least one carded operative that meets the competence requirements for the relevant tasks as specified in B4-I4 of Table B4 of PAS:2030:2014	Where this question is failed due to the carded operative not having their card with them, then at the discretion of the technical monitoring surveyor, it should be acceptable for a photocopy of the card to be provided after the survey.
IWI.1	Is there at least one carded operative that meets the competence requirements as specified in B8.I4	Where this question is failed due to the carded operative not having their card with them, then

	of table B8 of PAS2030:2014	at the discretion of the technical monitoring surveyor, it should be acceptable for a photocopy of the card to be provided after the survey.
UFI.1	Is there a carded operative at the site that meets the competency requirements for the measure being installed?	Where this question is failed due to the carded operative not having their card with them, then at the discretion of the technical monitoring surveyor, it should be acceptable for a photocopy of the card to be provided after the survey.

Question 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?

Yes we agree the technical monitoring agent should decide on a case-by-case the measures which can be re-inspected remotely. These should be limited to questions where Ofgem have confirmed that remote re-inspections are acceptable and also limited to measures where there are no other failed questions requiring a site visit for re-inspection.

Question 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?

Yes we agree with this and we would add a “during” photograph should be included showing the remedial work being undertaken.

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

Yes

Question 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.

We cannot think of any examples where additional evidence would be appropriate, however we agree the technical monitoring agent should still be able to request additional evidence to assist with the remote re-inspection. If the installer is unable to provide this additional evidence then the technical monitoring agent should be required to make a site visit.

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

Yes

Question 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?

Yes. If the technical monitoring agent is unable to gain access for a site visit, then the outcome should be determined as follows:

- i) If the evidence in the photograph is unclear and access cannot be gained for a re-inspection then the measure should be retained.
- ii) If the evidence in the photograph suggests the measure has not been remediated and access cannot be gained for a re-inspection then the measure should be rejected.

Question 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?

Whilst we understand the reason for monitoring a minimum percentage of re-inspections on site, we should point out that this requirement could negate any cost savings achieved by this proposal. This would be due to IT costs incurred in modifying systems in order for monitoring of remote re-inspections to be tracked. For this reasons we suggest the percentage should be set as low as possible such that it might be possible to implement a manual workaround.

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

Householder feedback can be used as an effective means of increasing the accuracy of remote re-inspections. For instance the householder can be telephoned to verify they are satisfied with the remedial work undertaken.

Question 7.1 - Please estimate the time that could be saved by these proposals?

We anticipate the time and cost savings achieved by this proposal would be comparatively low. This is for the following reasons:

- i) There are few questions where we agree it is appropriate for a remote re-inspection.
- ii) Measures that fail technical monitoring will often fail on more than one question, which would normally mean a site visit is still necessary.