

**Response to Ofgem's Consultation on
ECO2 Technical Requirements
from the Mineral Wool Insulation Manufacturers Association (MIMA)**

Introduction

1. The Mineral Wool Insulation Manufacturers Association (MIMA) is a trade body providing an authoritative source of independent information and advice on glass and stone wool insulation. MIMA actively promotes the benefits of mineral wool insulation and the contribution it makes to the energy efficiency of buildings and the comfort of their occupants.
2. We represent four of the leading insulation companies in the UK - Isover Saint-Gobain, Knauf Insulation, Rockwool and Superglass.
3. We welcome the opportunity to feed into Ofgem's technical consultation.

Guarantees and lifetimes

4. MIMA supports Ofgem's proposal to strengthen consumer protection by making sure that insulation measures installed under the ECO, which do not have an appropriate guarantee, are deemed to have a lifetime of zero years (Question 1).
5. The effect is that no energy or carbon savings can be scored for such insulation measures without an appropriate guarantee, thereby strongly incentivising the use of guarantees.
6. In our view, allowing measures through without a suitable guarantee should not be permitted at all. It could leave consumers exposed without a means of redress if something does go wrong in later years. Any reputable company should be in a position to provide a guarantee for their products. If they can't, for any of the reasons given in Ofgem's scenarios, they should not be permitted to benefit from support under the ECO.
7. For these reasons, we do not support the proposal to allow measures to be awarded up to the full lifetime's worth of savings in Ofgem's scenarios 3 and 4. Any wall insulation measure without an appropriate guarantee should receive a zero lifetime score, or simply be ineligible (Question 2).
8. Overall, we agree with Ofgem's interpretation that the policy intent under ECO is for wall insulation measures to be accompanied by a 25 year guarantee for the purposes of consumer protection and to protect the associated lifetime savings.

Technical monitoring re-inspections

9. MIMA's members have actively supported the requirements for technical monitoring of measures installed under the ECO. In our view, knowing that works may be checked is a powerful incentive for installers to do a good job, and from the consumer's point of view, they are more likely to see the cost and energy savings they expect.
10. Technical monitoring is a requirement placed on energy companies by Ofgem to ensure that ECO measures were installed to the required standards and scored accurately. Energy companies are required to commission technical monitoring on only a 5% sample of the measures that they had delivered. Where measures fail monitoring energy companies are required to resolve any issues discovered.

11. The report at the end of ECO1 showed that all energy companies achieved the required 5% monitoring rate, with some monitoring around double this minimum level. This suggests that there is no real issue with the ability of the energy companies to comply with the monitoring regime. Furthermore, weakening the already minimal framework would send a negative signal to consumers about the importance of quality installations and the performance of measures.
12. Checking the quality of workmanship is always best done on site. Skimping on the QA of the scheme would ultimately prove to be a false economy if consumers end up paying more on their fuel bills anyway through underperformance of works done.
13. We do not therefore support the proposals to change the re-inspection regime and urge Ofgem to maintain the current framework (Questions 4 to 7).

Party Wall Insulation (PWI) savings estimates and IUF

14. We would also like to take this opportunity to remind Ofgem (and DECC) that the in use factor attributed to PWI in the ECO still needs to be updated to 15% at the first available opportunity. 15% was the agreed level intended, however PWI was accidentally missed from the IUF list in the ECO Order and so was forced to take the external CWI IUF at that time.

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