



SWIGA OFGEM CONSULTATION RESPONSE PROPOSAL

Question 1.1:

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

Answer to question 1.1:

SWIGA agrees that any measure without an appropriate guarantee should have a default lifetime of 0 years.

Question 1.2:

Please give reasons for your answers.

Answer to question 1.2:

SWIGA is of the view that if there is not an appropriate guarantee, there would be no quality process paper trail to determine the effectiveness of the installation or the likelihood of it performing as it should for any length of time.

SWIGA believes that all measures should require a guarantee to ensure consumer protection in the event a failure occurs in the future.

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.

Answer to question 2:

SWIGA believes that allowing alternative assurance, even on a case by case principle could not provide sufficient evidence post installation unless all the stage photographs and surveys were available as well as an invasive survey to determine the thickness of the insulation used.

The key point is whilst alternative assurance may provide some empirical evidence to the systems performance, it still leaves the consumer with no guarantee and thus no future recourse. The absence of a guarantee may become an issue for the consumer if and when they wish to sell their property without a supporting guarantee at a later date.



There is a risk that utilities would be less concerned with ensuring the consumer is protected with a guarantee in the future if they believe there is an alternative route around the provision of one.

Question 3.1:

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

Answer to question 3.1:

SWIGA does not believe an alternative approach would be more appropriate in determining measures without an appropriate guarantee for the reasons stated in answers 1.2 and 2.

Question 3.2:

If yes, provide details

Section 3, Technical monitoring Re-inspections

Question 4.1:

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

Answer to Question 4.1:

SWIGA does not agree that in any circumstances, remote re-inspections are appropriate for EWI or IWI measures.

Question 4.2:

Give reasons for your answer.

Answer to question 4.2:

Photographs cannot fully capture if a repair has been completed in accordance with the design details provided by the system holder. A photograph could not show which base materials were used. It is critical for both the longevity of the system, and the validity of the guarantee that the original system manufacturer's materials were used for the repair, and these were installed by a trained, carded installer, registered to that system holder.



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?

Answer to 5.2:

SWIGA agrees with Ofgem's assessment that none of the EWI failure types highlighted in Appendix 1 are suitable for remote inspection.

SWIGA does not agree that the IWI.7 type in Appendix 1 can be effectively remote monitored. A photograph may show the fact that a mastic seal is in place, but it cannot show if the mastic seal is fully bonded to the surfaces which is critical to ensure air tightness with IWI systems.