

Energy Company Obligation (ECO) U-Value Consultation Questionnaire – Feb 16



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for energy consumers

Background

The questions below relate to the consultation on requirements for over-writing U-values for cavity wall insulation measures which can be found on our website :

<https://www.ofgem.gov.uk/publications-and-updates/eco2-consultation-requirements-overwriting-u-values-cavity-wall-insulation-measures>

Our proposals consist of three main parts:

- a. introducing an upper limit for overwritten U-values,**
- b. stipulating the evidence that we expect to be in place when a U-value is overwritten and how we expect inputs to be collected, and**
- c. a regime to monitor these measures; we suggest three approaches for implementing monitoring.**

Notes For Completion

Please complete all relevant sections of the document by selecting an answer for the question and then providing reasons/evidence for your response in the box provided. If you do not wish to answer a question please select 'N/A'. The questionnaire should be completed in typeface and returned via email to eco.consultation@ofgem.gov.uk by close of play **7 March 2016**.

Respondent Details

Organisation Name:	Anesco Limited
Completed By:	R. Smith
Contact Details:	robert.smith@anesco.co.uk

1. U-value Limit

1.1 Do you agree that it is unreasonable for the U-value of a cavity wall measure to exceed 1.6 W/m²K in premises in the age bands B-K?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide details and supporting evidence for your response below.

We believe that under this option more accurate starting U-values with capped values by age band is always going to lead to fairer carbon scoring under ECO

1.2 Do you agree that we should implement a limit of 1.6 W/m²K for overwritten U-values for cavity wall measures in premises in age bands B-K?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Dont Know
- N/A

Please provide details and supporting evidence for your response below.

As above & as soon as possible these limits to U-values by age band should be incorporated into the RdSAP software if possible

2. Evidence Requirements

2.1 Do you agree that relevant inputs should be collected for the U-value calculation via an intrusive inspection, using a borescope for example?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Much clearer evidence is needed in order to provide confidence in the values being declared but our experience is that the quality of photo evidence captured via borescope varies greatly from one assessor to the next, presumably depending on the type of scope being used.

2.2 What types of evidence do you suggest would support the inputs used for a new U-value calculation?

Please provide reasons for your response below.

Assessor to gather photos or possibly video of inside the cavities on each elevation to ensure the measure is genuine.

Declaration of attendance at property by the suitably qualified person (SQP)?

Detailed site notes and listing any differences between different elevations & any anomalies identified by the SQP.

2.3 Do you agree that the types of evidence listed in paragraph 2.5 are practical to provide?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know

N/A

Please provide reasons for your response below.

Nothing being suggested is onerous in terms of time or cost for a suitably qualified person with the exception of the potential cost of borescopes where these may need to be purchased if this option was to be adopted. Also, bringing this in retrospectively will cause logistical difficulties for the supply chain, some of which they may not be able to overcome.

2.4 Do you agree that the evidence listed in paragraph 2.5 is sufficient to support an overwritten U-value?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

More detailed findings from the person on site & they would clarify anything they find to be out of the norm or if they encounter several build styles at the same property which means the calculation would become more complicated. All backed up by clear site notes.

2.5 Do you agree that the inputs for a U-value calculation should be collected by an independent person to increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

To a degree lack of independence in this area has contributed to the current unease around inflated

overwriting of U-values so this would help.

2.6 Do you agree that an independent person collecting the inputs for a U-value calculation would be practical to implement taking into consideration cost, time and customer journey implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Any additional cost would surely be justified by the increased value these measures are generating for the installing firms although I accept that any additional home visits would have a negative impact on the customer journey so scheduling of these assessments would need to be considered within the process to minimise this potential issue.

3. Option 1 – Additional Monitoring Questions

3.1 Do you agree that option 1 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Yes as our preferred option although options 2 & 3 also have their merits.

3.2 Do you agree that option 1 would be practical to implement, taking into consideration cost and time implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Only limited cost & time implications as this is simply an extension of checks already being made as part of the score monitoring process.

3.3 Do you agree that a score monitoring agent is suitably qualified to answer the proposed questions relating to the U-value inputs?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

These agents are currently identifying issues within the system from the evidence being provided and with the proposals for additional evidence this should be relatively straightforward to them.

3.4 Do you agree that the proposed additional score monitoring questions are appropriate for identifying where overwritten U-values are incorrect?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

They focus on key drivers of the U-value start point - property age, wall construction & any existing insulation plus they cross-check for differences between site survey & U-value calculations.

3.5 Are there any additional questions that you think would help to identify inaccuracies in overwritten U-value calculations?

Please provide reasons for your response below.

N/A

3.6 Can you please estimate how long you think it will take for these new questions to be implemented into your systems?

Please provide reasons for your response below.

Could be incorporated into our existing submissions checking procedures & our technical monitoring with an internal briefing, followed up with a written communication for further clarity. No delays anticipated, this could be implemented immediately it became a requirement.

3.7 Do you foresee any issues if the questions were implemented during a monitoring quarter?

- Yes
- No
- Don't Know
- N/A

Please provide reasons for your response below.

There are always issues when any changes are made at a mid-point of any trading quarter. It would be preferable if any announcements of changes were to be made with advance notice of the start of a new quarter - at least one working week to enable stakeholders to roll out the changes with minimal issues.

4. Option 2 – Ongoing Monitoring

4.1 Do you agree that option 2 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

This would help to identify any issues at the earliest opportunity with installers being made aware that any failings on their part would have an increased likelihood of being identified with this regime in place.

4.2 Do you agree that option 2 would be practical to implement, taking into consideration cost and time implications?

- Strongly Agree
- Agree

- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

We believe that any increased costs would be accepted by installers as a trade-off for more certainty that their work was to standard & that any issues would be picked up by this increased level of score monitoring. After all they just want to know that compliant measures will definitely get paid with no threat of having those funds clawed back once funded.

4.3 If we were to implement a new monitoring regime in order to verify the accuracy of overwritten U-values for CWI measures, do you agree with the sample size and reporting timeframes outlined in paragraph 2.12?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Excellent tool to encourage installers' to maintain the highest standards with the spectre of random & possibly multiple audits as part of a new, more robust system. This may also encourage higher standards from them in terms of record keeping plus the clarity & quality of all evidence.

5. Option 3 – Audit Regime

5.1 Do you agree that option 3 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Possibly yes, for the reasons given in the previous answer.

5.2 Do you agree that option 3 would be practical to implement taking into consideration cost and time implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Likely cost in terms of staff time, agents' fees etc will be compensated for by less measures in query or rejected by either Utility companies or Ofgem as any issues would be identified earlier in the process & installers given the chance to correct any errors to safeguard the measure.

6. Additional Questions

6.1 Do you have concerns with U-values being overwritten for other ECO measure types?

Please provide details and supporting evidence for your response below.

Not at present

6.2 If you do not agree with any of proposals outlined, could you please suggest an alternative approach which you consider would provide assurance that U-values are being accurately overwritten for CWI measures?

Please provide details and supporting evidence for your response below.

N/A

6.3 Do you agree that the proposals outlined above will enable U-values to continue to be overwritten for CWI measures where this is appropriate?

Please provide reasons for your response below.

Yes, due to more accurate property-specific inputs, more confidence in the U-value over-writing processes & either more extensive or more frequent checks (or both?) via score monitoring all combine to provide more faith in the accuracy of the measures being funded in this important sector of our business.