

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



Making a positive difference
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:	Argyle Software / Quidos Accreditation Scheme
Completed By:	Chris Barrington
Contact Details:	01225 667210

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.

For the U-value to exceed 1.6 the property would have to demonstrate air infiltration and I am unsure how this would be evidenced. The expected value should be below 1.2.

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.

No. you will provide a new ceiling for improper energy assessors to aim for. Additionally you cannot mandate a limit on a lodged EPC in this way because it would contravene the RdSAP conventions, the only way would be to alter the ECO scoring tools to limit the U-values but this would be cost prohibitive and take too long to implement.

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.

Yes its not possible to evidence the blockwork otherwise. Photographs of the party wall in the loft or the area around the electricity meter where the blockwork can sometimes be seen can only provide partial evidence.

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.

Borascope examination for each wall.
Photographic evidence of party wall and other areas where blockwork is exposed.
Photographic evidence of the age dwelling.

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.

The installer will need to undertake an invasive survey to ensure the property is suitable for cavity wall insulation and the evidence can form part of this inspection.

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.

See reasons in 2.2. and 2.3 above

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.

I don't believe this will improve confidence, from the evidence the Quidos Accreditation scheme has collected it would appear that incorrect U-value calculations are already being supplied to assessors by 3rd party SAP assessors based on very little evidence.

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.

See answer in 2.5 above; additionally an independent person will have to redrill to inspect the cavity and the homeowner is unlikely to put up with this.

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.

Option 1 is the only practical alternative that can be implemented quickly without disruption to the existing supply chain.

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.

Options 2 and 3 will be expensive and time consuming to implement; Option 1 is the only practical solution.

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.

A score monitoring agent will be able to target and question those scores for example 1.4 and above for modern properties which are clearly out of line with the expected U-values of 0.8 to 1.2

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.

Yes, it is a slightly broad brush approach but the technical monitoring agents will be able to identify properties where the U-value provided is likely to be inaccurate.

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.

NA

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.

NA . Argyle Software produce approved ECO scoring calculation engines and the reporting functionality is out of scope.

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.

NA

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.

Argyle Software agree option 2 would increase confidence in the accuracy of overwritten U-value Scores.

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.

Implementing option 2 would significantly increase the cost of monitoring and by the time monitoring is implemented ECO2 will only have a few months left to run

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.

NA

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.

Audits happen to late in the process and create and area of risk in the supply chain

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.

Implementing option 3 would significantly increase the cost of monitoring and by the time monitoring is implemented ECO2 will only have a few months left to run, in addition option 3 creates risk which will have to be insured against.

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. Although Argyle Software recommends monitoring the level of overwritten U-values scores for other measures. It should be noted that before ECO over-written U-values were only rarely used (<0.1 of EPCs). If the percentage of properties with over-written U-values exceeds 1% for other measures then this should be investigated.

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.

NA

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, Option 1 provides the best way of ensuring compliance