

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:	Capture Carbon Ltd
Completed By:	John Buxton
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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.

When entering the breakdown of a cavity wall into SAP U-Value Calculator 2012 the u-value of 1.6W/m²K is rarely greater than this. Properties within the age band J & K should NOT be included within this consultation.

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

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.

An intrusive inspection is the only method of gaining the knowledge as to how the wall was built and what construction materials were used. A U-value can't be calculated without this knowledge.

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.

U-Value calculated by Qualified person.

Clear precise photographs of intrusive inspection with date, time and geotagging (Camera phones) as otherwise any old pictures would be used and U-Values generated that are not true.

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 evidence that has been suggested is easily practical to provide

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.

The evidence requested is insufficient and easily manipulated

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.

This should be completed by either the qualified person calculating the U-Value or his appointed representative who are both completely independent, therefore impartial and not employed or associated to the installer.

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.

Not practical, mainly due to the cost as the ECO funding is already diluted enough, this will decrease installer profit and increase customer contribution.

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.

The overwritten U-Value evidence will be like a foreign language to everyone other than a qualified SAP assessor. The monitoring companies use DEA's and the majority of these do not understand or are they qualified enough regarding u-Values and construction materials

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.

As all above

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.

Monitoring companies employ the services of DEA's who do not understand nor are they suitably qualified regarding u-Values and construction materials.

Unless the score monitoring agent is a qualified SAP assessor only then would my answer change

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.

The questions are correct providing that the score monitoring agent understands them

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.

What Lambda/R value has been used for the inner and outer leaf of the cavity

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.

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.

Can be manipulated easily

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.

As per option 1 this is not practical

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.

As per option 1 this is not practical

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.

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.

No as stated above far too easy to manipulate based on the evidence you have outlined

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.

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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.

No

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.

My alternative approach would be that 'NO' U-values should be overwritten from the default values from RdSAP from age band A up to and including band E, as these reflect the true value of a cavity wall.

Properties in age bands F to G can be completely different to RdSAP assumptions due to builders 'trading off' insulation regulations with the building inspectors in that era but it is highly unlikely that any builder used 'Dense Concrete' block work on the inner leaf, therefore a simple deemed starting U-Value of 1.0W/m2K would be a generous assumption for these.

Properties in age band H to I should have a deemed starting U-Value of 0.6W/m2K, this again is a generous assumption.

Any properties that have partial fill insulation eg. 25mm foam backed inner leaf blockwork (this is taken into account within RdSAP based on Building Regulations for that year of build) these should have a deemed starting u-value of 0.6W/m2K which again is a generous assumption.

Under Part L of building regulations a SAP assessment has been a requirement for all new buildings built since 1995, the U-Value requirement was set at (See below) These U-values have been decreasing under Part L since this date, therefore any property built after 2002 will not have a great impact on emissions or monetary savings for the resident. Properties in age bands J and K should not be incorporated within the scheme.

Built 1996 – 2002 will have a U-value of 0.45 W/m2k
Built 2003 – 2006 will have a U-value of 0.35 W/m2k
Built 2006 – 2010 will have a U-value of 0.3 W/m2k

Built 2010 to today will have a U-value of 0.2 W/m²k

As an example to the above a reduction in the U-Value of 0.1W/m²k will achieve a total lifetime saving in carbon emissions of approximately 2.5t/co₂, at the current rates of ECO funding this wouldn't cover the cost of the EPC and compliance process unless the property age is altered!!!!

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.

I don't agree, as above for cavity walls either the default starting u-value of RdSAP or a deemed value for properties within certain age bands due to building regulations for that year of build.