

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:	CELSIUS ENERGY LTD
Completed By:	STEVE WINMILL
Contact Details:	steve@celsiusuk.com

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 install cavity wall insulation in properties within age band B - K. If the wall make up is brick (102.5mm), clear cavity (65mm), medium dense block (100mm) and plaster, NOT plasterboard (22mm) then this offers a 1.65 starting U-Value.

I am unsure as to why this would be a problem and therefore completely disagree that nothing over a 1.6 U-Value should be allowed.

Essentially Post 1983 constructed properties can have 1.6 or worse starting U-Values because..... they are not always built in accordance with the regulations at the time.

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.

Please see above answer!

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.

This should always be done. Otherwise the make-up of the wall can only be assumed

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.

The actual make-up of the wall using an intrusive survey inclusive or borescope or similar scope

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.

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.

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.

If there is enough and correct evidence then why should an additional cost be placed on contractors within this industry? The requirement to have an independent person carry out I-Value information collection would mean further reduction on measures being installed as contractors simply won't be able to afford to offer CWI to householders

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 above response. More visits to the property would reduce the ability to "sell" CWI to householders whom are already fed up with a technical survey, RdSAP survey, Chartered Surveyor, Install, Technical Monitoring (potentially more than once). A further "visit" would put a lot of householders off

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.

This would be the better option rather than an independent person collecting the U-Value info. Reducing the number of visits to the property but also ensuring information is correct and highlighting any training issues for contractors

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.

Again, this would be the preferred option an increase in number of visits and practically speaking, would not add a great deal of time onto the technical monitoring of the property anyway

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.

This is only a matter of training and experience

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.

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.

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.

Once we receive the template then we would be able to implement these new questions immediately

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.

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.

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.

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.

Agreed that it might have a negative impact on the supply chain but perhaps a fair approach would be to consider the issues arising from such audits of individual agencies supplying the U-Value info and implement training programmes and discussion to ensure a more accurate U-Value calculation in the future. Simply stating that no more over-written U-Values can be received because a minority in the industry have inaccurately calculated U-Values helps nobody, most importantly those householders that should be able to receive cavity wall insulation, pay a levy on their energy bill but then can't receive the funding they have a right to receive

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.

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... every ECO measure where a U-Value is required or might be required, should receive the same treatment as cavity wall insulation

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.

I agree that there should be monitoring implemented to include checking the wall make-up and that it is accurately reflected within the U-Value calculations but to use RdSAP's assumption that a property U-Value for properties between B and K age band should be no greater than 1.6 is ludicrous. We know that not all properties are built as per the regulations of the time otherwise, these properties would actually have insulation at build and we know fullwell that they don't.

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.

If SAP and RdSAP are going to be utilised as the tool to calculate carbon under the ECO then U-Value's MUST be allowed to be over-written. If they are not allowed then an entire industry will be destroyed and that not only affects contractors and their employees but consultancies, system designers and more importantly the householders that we're trying to assist. As stated previously, we know that Post 1976, 83, 91 and even 96 built properties don't all have insulation at build, making SAP and RdSAP inaccurate anyway. Over-writing U-Values, even if slightly inaccurate is a lot more accurate than the assumptions made by RdSAP (which you don't appear to question!).