



Hannah Clapham
Energy Efficiency and Social Programmes
Ofgem e-serve
9 Millbank
London SW1P 3GE

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ECO2 consultation on requirements for overwriting U-values for cavity wall insulation measures

Dear Hannah

For the purposes of this consultation we will not be submitting a full response, due to certain elements of the U-Value calculations being outside of our technical knowledge. We have discussed extensively with our supply chain to allow us to have a wider view on the issues, however we feel they are better placed to respond on the specifics. As such we will respond below to the proposals in a high level context.

For the wider position we would like to express our support for the most recent proposal from the March workshop – utilising default U-values by age band. We feel this will reduce the concerns over limiting delivery on the Upper Cap approach, and one of our installers will also be providing evidence concerning the problems with the Upper cap.

Evidence requirements – we agree with commonality in evidence requirements assuming they are sufficiently robust to allow Ofgem to gain the relevant level of assurance.

For both additional score monitoring and on-going monitoring we would raise the questions concerning the qualification of e.g. TM Agents to allow them to conduct such monitoring, as well as the additional systemisation that these would require.

Overall we would like to emphasise our support for gaining assurance about the validity of scores we are submitting to yourselves, however we are conscious of the remaining period of ECO 2 and would like this to be kept in mind. Additional cost and lead times involved in system changes to software and process must be kept in mind to ensure any changes are not implemented in 6 months very close to the end of the scheme (especially with the potential transition to deemed scores).

Yours sincerely

Jon Owens
Environmental & Social Programmes Manager
Jon.owens@first-utility.com