

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:	Green Deal First
Completed By:	Colin Robinson
Contact Details:	colin@greendealfirst.net / 07958144411

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.

Whilst I have no evidence to support this I would agree that the RdSAP assumed value for an empty cavity in these age bands is accurate.

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.

I believe this is a sensible approach as the RdSAP assumed value is an accurate value for an empty cavity wall.

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.

There is no other way to determine the makeup of the cavity walls other than to use an intrusive investigation. The investigation should take place on all elevations and not just assumed to the case all round.

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.

As required by RdSAP documentary evidence is required. This would be provided by a suitably qualified individual.

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.

It is not clear from this list what would be classed as evidence? Obtaining photographic evidence of the inside of the cavity is particularly tricky. Obtaining photographic evidence of the depth of any partial - fixed insulation would be virtually impossible from a boroscope examination.

Not that these values cannot be determined from using a boroscope but actually taking a photograph of it would be very difficult without expensive equipment.

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.

A large number of measurements and observations are required and are difficult to evidence. For example 1 part that makes a difference is whether the internal plaster is skim or dot and dab plasterboard. There is no photographic evidence which could determine this. Similarly evidencing the density of the inner leaf block wall cannot be identified from photos. I would suggest that suitably qualified technical monitoring agents would be able to check the U-value calculation report at stage 2 or 3 monitoring.

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 would make the cost of providing insulation prohibitive, which then threatens installers ability to help people who are in fuel poverty.

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.

The turn around time to deliver the volumes of insulation required by our industry and our fuel efficiency targets would make this prohibitive. There are not enough suitably qualified people and not enough money to pay them.

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.

A TM agent could compare a U-Value report with physical, investigative survey. This is the best way to instill confidence in the calculation.

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.

TM agents should be suitably qualified and are already in place for this role. Carrying out an investigative survey would not add too much time to their current schedule.

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.

TM agents have the foundation knowledge to cover this. Some may require additional training which would take no more than 1 day.

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.

No additional questions needed

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.

2 weeks

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.

No, because the evidence supplied would be almost impossible to verify. The evidence would also be very difficult to interpret due to how difficult it would be to obtain.

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.

It would be practical to implement this option, but the availability of the evidence on which this option is based is questionable.

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.

It wouldn't increase my confidence in a U-Value calculation because I cant see how the evidence which could be provided would be sufficient to make a determination of the U-Value.

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.

Easy to implement, but not a reliable method.

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.

I don't know of any other U-value issues

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.

The additional TM monitoring is my preferred choice

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, where it is appropriate U-Values should be allowed to be overwritten, because this is part of RdSAP and makes EPCs more accurate.