

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



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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:	Happy Energy
Completed By:	Adrian Wright
Contact Details:	adrian@happyenergy.co.uk

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.

Age band B goes back to 1900 so it is very difficult to judge whether a very old poorly constructed cavity wall could have a U-value greater than 1.6. If the question related to properties built in bands G-K (1983-2011) which in our opinion are the homes most likely to have overwritten U-values, then we would strongly agree that it is unreasonable for the U-value of these properties to be greater than 1.6.

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.

We do not believe that for ECO purposes there is any need to overwrite a U-value for cavity walls unless the property was built after 1983 after which the property is assumed to have full or partial fill insulation in the cavity walls. If these properties do not have any insulation in the cavities and there is no obvious other forms of trade off insulation such as internal or external wall insulation then it is possible that the home was built to the building regulations of a previous age band or that the builder simply failed to construct the walls to building regulation standards. In this instance a reasonable adjustment could be made to the starting U-value.

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.

If U-value changes are allowed to continue it is essential that an intrusive inspection be used to properly identify the make up of the wall.

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.

Photographs inside the cavity would be beneficial although these can often be blurred or hard to decipher.

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.

We believe that if U-values are to be changed then the person who is authorised to calculate the U-value should also be the person who collects the data.

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.

This is likely to add a great deal of extra cost and hassle into the customer journey so our preference would be a deemed U-value option.

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 collection of U-value data is subjective and it is likely that any third party inspector would come up with different results to the installer and this would lead to work being rejected and payments being clawed back.

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.

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 monitoring agent is not trained to gather U-value data

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.

It may be possible to identify any fraudulent U-value calculations but it will be almost impossible to do this once the wall is filled and any further drilling of the wall could invalidate the insulation warranty

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.

N/A

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.

This approach does will not tackle the fundamental problem of incorrect data being used to fraudulently increase the carbon 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.

It would seem to be a reasonably simple process to implement but it would not get to the route cause of the issue

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.

We simply do not believe this is the right approach

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.

As with option 2, this auditing will offer no additional confidence that the data collection for the U-values is accurate

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.

We do not believe that this is the right approach

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.

Yes we would question why there is any need to overwrite U-values other than for cavities built after 1983 which have not been insulated

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.

We believe that a different option should be considered by Ofgem, that being to use deemed U-values for the pre and post insulation U-values for all properties built after 1982. This could be achieved by amending the ECO scoring tool rather than having to amend the U-values in the EPC. We would propose the following deemed U-values:

All homes built in age bands G-K with an empty cavity wall to have a pre-insulation U-value of 1.3 and a post insulation U-value of 0.35

All homes built in age bands F-K with partial fill insulation to have a pre-insulation U-value of 1.0 and a post insulation U-value of 0.35

In order to reduce any potential further fraudulent activity, we would consider it reasonable for Ofgem to impose a stricter auditing regime on any property built in age bands G-K which has had a wall U-value overwritten to a value of greater than 1.6, from a date after the response of the consultation and

up until the new versions of the ECO tools can be released to include the new deemed U-values as above.

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