

# 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](mailto:eco.consultation@ofgem.gov.uk) by close of play **7 March 2016**.

## **Respondent Details**

Organisation Name:	Llewellyn Smith Limited
Completed By:	John Whitefield
Contact Details:	07967 165043

## 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/m<sup>2</sup>K 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 have not experienced U value figures in excess of this whilst working with the supply chain, except for stone built houses.

**1.2** Do you agree that we should implement a limit of 1.6 W/m<sup>2</sup>K 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 our response to question 6.2.

## 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 happen via an intrusive boroscope inspection, with photographs taken of inside the cavity, to prove there is no insulation, and each element of the wall, including a photograph of the overall dimension of the wall. The dimensions of the components is required and the density type of the inner blockwork. The type of inner finish is required nominally plaster or plasterboard on dabs.

**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.

Photographic evidence from within the cavity, the thickness of the outer brickwork and a photograph of the overall dimension of the wall. The dimensions of each of the components is required and the density type of the inner blockwork, as well as the plaster or plasterboard internal finish.

**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.

We do believe that the type of evidence asked for are practical to provide. The fourth point of paragraph 2.5 should be a prescriptive pro forma devised by Ofgem/industry.this should include photographic evidence.

**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 fourth point should include dimensions of each element of the wall to enable the accurate calculation of the U value.

**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 strongly agree that these should be collected by an independent person. We have experienced inaccurate examples of the collection of inputs when conducted by a contractor. The appropriately trained independent person (please ask us for advise on this, especially with regard to blockwork

identification), increases confidence and mitigates the risk surrounding the whole issue.

**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 pre installation visit is currently working with the supply chain. The visit is planned within a short period following "sign up" of a customer, which does not affect the customer journey. The cost of the independent person visiting site does not add significant cost. The measure is still commercially viable to the contractor.

### 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.

It will not be possible for Technical Monitoring Agents to answer questions 2 and 4 post installation of the measure. The wall should not be drilled post installation. The changes required to our own IT system would take 3 months to amend.

**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.

It is not practical to inspect post installation. The changes required to IT systems are also prohibitive to implement these scoring monitoring questions.

**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.

The score monitoring agent, (or whomever is the independent person), will require specialist training in the identification of the differing types of blockwork. This element carries the highest variable in terms of the outturn U value.

**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 should be asked pre installation in a format to be devised by Ofgem/industry.

**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.

This may not be applicable if the monitoring is carried out under option2.

**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.

For our bespoke system, it would take 3 months and some cost to implement. We would want to understand the likely volumes.

**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.

Our IT system would not be able to adapt quickly enough.



#### 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.

I understand that this option is desktop and carried out by the energy suppliers.

**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.

The 5% sample should suffice if an independent visit has taken place pre installation.

## 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.

The supply chain needs clarity as what is required for the measures to be accepted. This would lead to uncertainty for the supply chain and this measures would not be installed.

**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.

We have little experience of this applying to other measures.

**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.

If the default U value of 1.6 is used, then the independent inspection is essential to verify the wall construction and that it is not already insulated.

**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.

The supply chain requires clarification so that it can deliver these measures.