

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:	National Energy Services
Completed By:	Lisa Blake
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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.

For the older age bands it could be higher than 1.6, a brick/dense block cavity built in 1930 could be as high as 1.9.

However, for the latter age bands G and upwards, it is probably far too high. The range in likely U-values for age bands B-K is too large to set a single value. This statement should be backed up by evidence from BRE/in situ testing, rather than just from SAP Appendix S

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.

The age band range is too broad, if a U-value limit is to be introduced, it should be structured to have different limits for the older dwellings and newer dwellings. The limits should be set by the results of in-situ testing. The other issue with setting a limit through an Ofgem convention is that lodged EPCs must follow RdSAP conventions. So any limit would have to be set through approved ECO software.

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.

The inputs for the U value calculation should be evidenced by an intrusive survey. However, a borescope examination would not in itself enable the thermal characteristics of the the inner leaf to be established, which is an integral part of the required inputs. Any procedure that would be accepted as suitable evidence should be set out by an expert body, such as BRE. The procedure would need to provide a replicable way to establish the type of inner leaf (brick, block etc) and for blockwork it's density (e.g. high / medium / low) and hence an estimate of its thermal characteristics.

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.

There needs to be a study to establish what that evidence could be. A core sample could establish the density of the block, but this is expensive and would only really be feasible on an estate of identical houses.

If the original plans and U-value calculations were available, this would be suitable evidence.

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.

The evidence requirement is not defined in sufficient detail to provide the evidence for the inputs. In addition there needs to be a clear definition of what should be included in the site notes for the justification of assumptions.

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 evidence requirements listed is not definitive enough to comment.

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.

The principle of an independent person producing the outputs is a good one. However, it is not clear who such a suitable person would be. First a clear process for collecting the inputs needs to be agreed, and then it can be assessed who is best placed to implement this procedure. Independence alone would not guarantee that U values are not inflated, as the person needs also to be following a set procedure that can itself be checked.

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.

For individual dwellings, the impact to the cost and customer journey would not be justified for the possible small decrease in excess overwritten U-values. However, for estates of dwellings of the same construction the costs are likely to be acceptable.

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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.

We are not involved in monitoring

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 are not involved in monitoring

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.

We are not involved in monitoring

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 are not involved in monitoring

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.

Any overwritten U-values should have the same scrutiny of evidence. We have seen Chartered Surveyor reports for system build properties with very high U-values.

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 most desirable approach in our view is to adopt an approach consistent with the RdSAP conventions, and to define clearly what evidence is required to back up overwritten U values. However, it is not proven that there is any viable/cost effective way to truly evidence the inputs of an existing wall U-value. If this proves to be impossible, rather than considering accuracy, there should

perhaps be a procedure that ensures consistency and makes fraud more unlikely. There could be a set value of 1.3 (as has been proposed by some managing agents) for all unfilled cavities (identified by a borescope examination), this would probably overestimate some values and underestimate others. The main problem with this option is that, because of RdSAP conventions, it would need to be catered for in approved ECO software and would require all ECO software providers to update their software, which is time consuming and costly. This option would also prevent scoring being done manually in RdSAP software as changing the U-value to 1.3 would contravene RdSAP conventions, which must be followed for lodged EPCs. This would also only cover age bands up to H as for a measure to be a recommended measure it must appear on the GDAR and the CWI measure only allows for dwellings up to an including age band H.

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.

Possibly. We believe that the additional evidence requirements may work if a clear procedure is defined and a suitable independent person defined to carry out the inspection. We suggest that BRE or another organisation be commissioned to establish whether or not such a procedure is practical and if so define it in detail.

If this proves impractical, the approach discussed in 6.2 might be a pragmatic approach; whilst this solution is not perfect, it would appear to be the most plausible option available.