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 Insulation Association
Completed By:	Neil Marshall
Contact Details:	neil.marshall@nia-uk.org

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.

There are properties on the banding B to E that when you work out the U values they are actually over 1.6, there are also properties in specific parts of the Country that continued to build solid wall properties up until the second world war. Most of these properties are higher than 1.6. So we do not think that it is unreasonable for properties to exceed 1.6 W/m2k. But would agree that it is unreasonable for properties from band F to exceed 1.6 W/m2k.

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.

In the interest of streamlining and to make the process easier administratively and de-risking the submission process to Obligated parties we would be in favour of a limit of 1.6 W//m2k.

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.

You have to borescope the walls to ascertain whether the property actually has any CWI/Insulation, and so this process is being carried out and is part of the CIGA Best Practice. Although we would add that you can ascertain the blockwork type from the loft space when collecting enough data in order to work out the actual U value of the wall. Using a borescope also helps identify the width of the cavity for the U value calculation.

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.

Many companie already provide a full U value calculations for each overwritten U value was also take supporting photos for the overall wall thickness and cavity width. They also get photos of the internal blockwork to establish the blockwork type. This means that should any of the properties submitted be audited or queried then additional evidence can be made available should it be required.

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.

They are practical.

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.

It also depends on whether or not the evidence is completed by the installer or someone independent to the installling company.

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.

Having an independent person de-risks the process which in turn enables the obligated party to

manage their risk more effectively and independently.

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.

There will be an increased customer journey without doubt, to a journey, which is already quite invasive and about to get more complicated, with additonal costs. But this is better potentially than the industry not being able to insulate properties built in this time period, whilst at the same time de-risking the process.

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 would increase the accuracy overall but the banding of a property does not matter if the U value calculation is there to support as this is made up from each construction component of the wall. So we would not have this as a potential scoring/RdSAP potential failure question.

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.

Practical yes but will significantly increase costs due to additional process & potential independent processes

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.

Only if they have the correct qualifications to do so such as NDEA Level 4

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.

There should be a degree of tolerance such as +/- 10%

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.

Inaccuracies should and will be picked up at the beginning of the process, and we would assume that installing companies will be checking information provided back to them before installation takes place. We would make sure that in the set of TM questions it clearly defines who or which company worked out the U value calculation. This way obligated parties can ensure that a different TM agent carries out the technical & RdSAP inspection post installation or what we currently deem a C3.

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.

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.

Providing all parties are familiar with the date of implementation, and not retrospectively.

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.

TM should be inline with current TM % reporting so we would agree with 5%.

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.

No as this timeline is far too short and obligated parties can or could just chose not to allow overwritten U values as the risk and timelines element are too demanding. TM timelines should be in line with ECO 2.

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.

Sample size yes, but not the timeframe that has to be more flexible.

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.

Many companies already provide an increased amount of compliance for overwritten U values, and can provide it if requested, obligated parties tend to specify the amount of complaince required which is usually more than the minimum stated/requested by Ofgem. Audits should be done regularly this way the amount of carbon that potentially could be at risk on final determination is as low as possible

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.

If the process is implemented correctly there will be a negative effect initially during the training and upskilling phase. The supply chain should then return to a normal level as overwritten U values with an independence de-risks moving forward whilst also allowing the maximum property bandings to potentially be insulated. There will of course be additional costs

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.

No providing they are done by an appropriately qualified person and presented according to the correct ECO complaince requirements.

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 alternative would be to look at property bands F, G & H with an alternative assumed default U value once it had been established the cavity wall had not been 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.

Yes we agree that the process will allow, enable U values to continue to be overwritten, especially in those constructed/bands 1976 to 1995. At the moment some obligated parties associate too much risk with the current process.
The CWI Industry needs to have a methololgy that de-risks the process and thus allowing the maximum number of potential properties to be insulated, and therefore help all obligated parties in the delivery of the obligation.
We would also add that properties in bandings F 1976-1982, G 1983-1990 & H 1991-1995 are essential to all future obligation delivery and the CWI industry.