

ECO2 consultation on requirements for overwriting U-values for cavity wall insulation measures

Close date: 7th March, email: eco.consultation@ofgem.gov.uk

Response from the Sustainable Energy Association

About the Sustainable Energy Association:

The Sustainable Energy Association is a member based industry body offering innovative policy solutions that link up building-level technologies and the wider energy system to achieve a low carbon, secure energy future for the UK, benefits for UK consumers, and commercial growth for businesses working in the sector. Our membership is comprised of a wide range of organisations that engage to develop our policy positions, establishing member-led working groups and a governing body of members to discuss and authorise policy positions that have real commercial impacts.

The Sustainable Energy Association (SEA) would like to submit a response focused on the principles behind this consultation.

The SEA appreciates Ofgem's concern that a reportedly increasing number of default U-values are being overwritten to unreasonably high values for Cavity Wall Insulation (CWI) installations under ECO.

It is important that these figures are reported accurately, to ensure the fidelity of ECO to delivery of Government objectives. Overstating cost-savings or carbon savings at any point in the reporting process will reduce the success of genuinely delivering the important benefits which ECO seeks to achieve; historically that of limiting the UK's carbon emissions and reducing fuel poverty – the latter objective being understood to be of increasing significance in the Government's thinking with regard to the ECO policy.

Given that Ofgem states that 'unreasonably high' figures are being provided for U-value submissions, as reported under RdSAP calculations, then it seems justifiable and prudent to constrain values which can be stated under RdSAP calculations to 'reasonable' levels. Of course, the context of what may be considered 'reasonable' may change in future, according to whether new means of delivery or products emerge on the market

For the moment however, the proposal of 1.6w/m²k as a reasonable maximum level (as set out in the consultation document) is supported by the SEA.

The SEA would also support proper and appropriate data and documentary evidence being reported by properly accredited individuals, as per section 2.4 onwards of the consultation. Ensuring both an individual can be held responsible for the accuracy of scores and logging data with regard to the

process by which they determined what is an appropriate 'deemed' U-value will increase both the transparency of the process and the rigour by which it is carried out.

This is also the information which will be essential to ensure any following audit-based monitoring system fully delivers.

With regard to checks to be carried out to guarantee accuracy of the overwritten U-values, it is the SEA's opinion that option 3; an audit regime is likely the most cost-efficient route to delivering improvements in U-value ratings. Ofgem's understanding that there is a problem with excessively generous values means that there is already data which could indicate where spot-checks could be most effective. Key to delivering best value from this approach would be to properly targeting these audits.

In addition, Ofgem circulated on Wednesday the 2nd of March a further question, which proposed setting a default U-value for each age band for cavity walls that are unfilled. Therefore where a cavity wall is unfilled, yet it is in an age band where RdSAP assumes that it is filled, the installer would use the relevant new starting default U-value. In order to use this new default start U-value the age of the property and the unfilled cavity would need to be evidenced.

The SEA would support this proposal.

For further information, please contact:

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