

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:	Walter N French
Completed By:	Walter N. French
Contact Details:	Walter.French@me.com 07711803922

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.

U values for age bands B-E should not exceed 1.6/1.7 W/m²K

U values for bands F-H where there is an empty cavity should not exceed 1.0 W/m²K

U values for bands G-H where there is partial fill in cavity should not exceed 0.6 W/m²K

From band I there should be no change to standard U values.

From band F-H there were different trade-offs, eg Double Glazing, which allowed builders to have empty cavities with min- brickouter/block inner leaf

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.

See answer to 1.1 as from band F this would be far to generous and would encourage the wrong type of behaviour

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.

Boroscope needs to be done for all CWI properties so is not intrusive.

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.

Boroscope should provide evidence that cavity is empty and that inner leaf is a block

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.

It is not possible to accurately determine exact composition of inner wall from boroscope view or the exact thickness of that wall. It is a best an interpretation of the wall thickness, known outer leaf and internal wall finish.

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.

See answer to Q2.4 and Q2.3

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.

Cost and inconvenience to not make this suitable as mandatory and not likely to be any more accurate as without carrying out a core sample from the inside of the house to the cavity you can not accurately determine the composition and hence R value of the inner leaf. It is unlikely House owner would allow this to happen particularly if no work subsequently carried out.

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.

See answer to Q2.6

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.

How can score monitor find out the density of inner leaf without carrying out a core sample. As CWI already installed he could not even see inner leaf with a boroscope.

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.

See answers to Q3.1 - impossible for Score Monitor to find out composition of inner leaf without taking a core sample - very unlikely houseowner would allow who would analyse sample?

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.

Not qualified for density question, and the age band question should relate to when property obtained Planning Permission not when it was completed due to the short timescales between Age bands from 1976 onwards and Builders being allowed to finish complete sites even if only 1 property started in the original Building Control period.

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.

See answers to Q3.1 to Q3.3

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.

No

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.

One month

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.

Monitoring question on density of inner leaf can not be accurately decided unless by intrusive core sample. This makes the suggested process untenable and of no real value.

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.

See answer to Q4.1

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.

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.

Evidence of density of inner leaf is unreliable if guessed from a photo - once filled can not be checked without destructive intrusion of a core sample.

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.

See previous answer

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

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.

Starting U values should be allowed to be overwritten only for those properties built under the Building regulations for age bands F to H only, with an agreed standard value of 1.0 for those properties with an empty cavity and 0.6 for those with a partially filled cavity. This is approximately the average U value for this period if calculated according to current methodologies. A final standard U value could be calculated and used e.g. 0.45 and 0.35, or just allow RdSAP to calculate the final value.

There is no reason to overwrite pre 1976 U values.

If you use allowing a standard U value as the starting U value it could be implemented quickly as the only proof required is age band and whether cavity is empty or not.

See attached a EST best practice Guide on assessing existing U values in Scotland which gives further details on how builders could pass building regs.

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 and it would allow responsible installers to look at properties in the F-I age bands and be more certain of the scores they could attain. Many responsible installers avoid these properties due to the problems created by a few people playing the current system.