

Energy Company Obligation (ECO) Technical Monitoring Consultation Questions

Background

The questions below relate to the ECO2 consultation on technical monitoring which can be found on our website:

<https://www.ofgem.gov.uk/environmental-programmes/eco/contacts-guidance-and-resources/consultations-and-feedback>

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. The questionnaire should be completed in typeface and returned via email to eco.consultation@ofgem.gov.uk on **11 October 2016**.

1. Respondent Details

Organisation Name:

[Scottish and Southern Energy (SSE) Plc]

Completed By:

[Paul Cannon - Regulation Analyst]

Contact Details:

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1. Changing the failure trigger point for score monitoring from 20% to 10%

1.1 Do you agree that the failure trigger point for score monitoring should be set at 10%?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, what do you believe the trigger point should be and why?

[We agree with this pending the introduction of deemed scores. By having consistency in the failure trigger points, there will be less confusion in targets to be achieved by both Managing Agents and Installers. If deemed scores aren't implemented, we think the trigger point should remain at 20% as the level of complexity currently experienced validating RdSAP inputs would continue.]

1.2 Do you agree that the score monitoring fail rate above which a subset of measures is considered to be of 'high concern' should be set at 25%?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, what do you believe the threshold should be and why?

[Again, universal targets for both score and technical monitoring make the process easier to manage, provided deemed scores are introduced. Should deemed scores not be implemented this percentage should remain as it is currently.]

2. Linking requirements for Additional Assurances directly to the Pathway to Compliance

2.1 Do you agree the required additional assurances should be based on which pathway an installer is placed on?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, please explain why.

[Providing clarity on the expectation of what additional assurance is required and when, is a welcome improvement to the process.]

3. Introducing target ranges for mid-installation inspections for certain measures

3.1 Do you agree with the introduction of target ranges for mid-installation inspections for measure types with both mid-installation and post-installation questions?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, please explain why.

[We agree with the principle of the changes. However, during the consultation workshop on 28th September a suggestion was made to simplify this further by utilising a target of 2% at stage 3, 2% at stage 2 and 1% to be delivered at the supplier's discretion. We support this suggestion and believe it would make it easier for both Ofgem and suppliers to administer.]

3.2 Do you consider the ranges proposed for each of the measure types listed to be reasonable?

SWI

- ☒ Yes
- ☐ No

FRI

- ☒ Yes
- ☐ No

UWI

- ☒ Yes
- ☐ No

If not, please indicate for each measure type where you disagree what you would consider a reasonable range and why.

[Any targets that are applied should be universal regardless of measure type. Different targets for different measure types would cause confusion and complicate reporting. We support the approach outlined in our response to 3.1. We would also request that Ofgem provide the proposed stage 2 questions to suppliers for review as these are not included within the consultation document.]

4. Removing best practice questions

4.1 Do you agree that we should remove the best practice monitoring questions?

- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree

If not, please explain why.

[As there is no existing requirement to report Best Practise monitoring to Ofgem removing the questions will have minimal impact. If removed, suppliers would still be able to realise the benefits of Best Practice questions by utilising the existing questions through their monitoring programme.]

5. Score monitoring questions for all measures

5.1 Do you agree with the proposed common score monitoring questions listed below?

Q1) *'Does the measure installed match the notified measure type?'*

- ☒ Yes
- ☐ No

Q2) *'Does the primary fuel type match the notified primary fuel type?'*

- ☒ Yes
- ☐ No

Q3) *'Does the primary fuel type match the notified primary fuel type?'*

- ☒ Yes
- ☐ No

Q4) *'Does the number of bedrooms match the notified number of bedrooms?'*

- ☐ Yes
- ☒ No

Q5) *'Is the claimed percentage of measure installed a reasonable reflection of the actual percentage of measure installed?'*

- ☒ Yes
- ☐ No

Q6) *'Is the claimed percentage of property treated a reasonable reflection of the actual percentage of property treated?'*

- ☒ Yes
- ☐ No

If not, please indicate which questions you do not agree with and why.

[Q2: Ofgem should provide clarity on how this question is to be answered or evidenced where a fuel switch takes place.]

Q4: It would be helpful if Ofgem could provide a clear definition of what constitutes a bedroom. Previously, a similar question around habitable rooms was removed due to ambiguities in the definition leading to large numbers of 'False Fails'. This definition should not be heavily dependent on the opinion of the inspector.

Q5 and Q6: Given that Deemed Scores now stipulates 10% intervals we believe a 'reasonable reflection' should be defined by Ofgem as 10% either side of what has been recorded. Otherwise there is a significant risk of inconsistency between TMAs.]

5.2 Do you think any further common questions should be added?

- ☐ Yes
- ☒ No

If yes, please indicate what further questions you want to see included.

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6. Measure specific score monitoring questions

6.1 Do you agree that the proposed measure specific score monitoring questions listed below will allow us to verify the deemed scores as currently laid out in BEIS's and our consultations?

Q1) 'Cavity Wall Insulation - Does the product installed at the premises match the product used to determine the notified score?'

- ☒ Yes
- ☐ No

Q2) 'Loft Insulation - Is there a pre-existing insulation level declaration present?'

- ☐ Yes
- ☒ No

Q3) 'Loft Insulation - Has the loft hatch been insulated to the appropriate standards?'

- ☐ Yes
- ☒ No

Q4) 'High performing external doors - Has the correct measure type been selected for the part of the door that is glazed?'

- ☒ Yes
- ☐ No

Q5) 'Park Homes - Does the park home size match the notified park home size?'

- ☒ Yes
- ☐ No

Q6) 'Solar PV - Does the number of panels installed match the number of panels claimed for?'

- ☒ Yes
- ☐ No

Q7) 'Electric storage heater - Does the type of electric storage heater installed match the type of electric storage heater notified?'

- ☒ Yes
☐ No

Q8) 'Boiler - Does the type of boiler installed match the type of boiler notified?'

- ☐ Yes
☒ No

Q9) 'Boiler - Do the heating controls installed encompass a programmer, thermostat and TRVs to at least 50% of all radiators?'

- ☐ Yes
☒ No

Q10) 'Heating controls - Do the heating controls installed encompass a programmer, thermostat and TRVs to at least 50% of all radiators?'

- ☒ Yes
☐ No

Q11) 'Room-in-Roof measure - If the Room-in-Roof measure has been notified as having insulated the residual loft space, has the residual loft space been insulated?'

- ☒ Yes
☐ No

Q12) 'All heating measures - Does the wall construction type notified match at least 50% of the total external wall area of the property?'

- ☒ Yes
☐ No

If not, please propose alternatives and indicate with which questions you disagree, and why.

[Question 2 - We suggest this declaration replaces the existing Virgin Loft declaration rather than introduce an additional declaration. There is the potential for a customer to remove this document from the loft prior to a monitoring visit. Guidance on how to proceed in such a circumstance would be welcome. It would be helpful if that guidance detailed any additional evidence which could be provided to overturn the initial fail. Additionally, suppliers would be helped by clear guidance on what action should be taken if there is a signed declaration but also clear evidence of previous insulation.]

Question 3 - We believe this is already covered by the technical question set: "Has the loft hatch been insulated as specified in PAS 2030:2014?". If this question is added, we will be failing the same property twice for the same issue. Ideally, the question would appear in either the technical or scoring question set and not both.

Questions 4, 5 and 6 refer to measures that have not been monitored previously. Can Ofgem provide the other questions to be used for these measures so that these additional questions can be taken in

context?

Question 8 - We would like to know precisely what is meant by 'type of boiler'. Does this refer to the make and model or the system type (e.g. gas combi-boiler)?

Question 9 - This question could cause confusion due to the individual boiler and heating control measures. Ofgem confirmed at the workshop on 28th September that this question refers to a combined boiler & heating controls measure, as such we propose a change of wording to the following: "Where the boiler measure has been notified as including heating controls, do the heating controls installed encompass a programmer, thermostat and TRVs to at least 50% of all radiators?"]

6.2 Do you believe any further score monitoring questions are needed for specific measure types?

- ☐ Yes
- ☒ No

If yes, please indicate what questions you would like to be added and why.

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7. Suitable qualifications

7.1 Do you agree it is no longer necessary for a score monitoring agent to have DEA accreditation or similar qualifications?

- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree

If not, please tell us why you believe DEA accreditation or similar qualifications should be necessary.

[We would like Ofgem to provide a definition of "suitably qualified" for both Score and Technical monitoring. At Ofgem's recent consultation workshop, it was suggested that the requirement for the score monitoring agent to hold the DEA or equivalent qualification remain until ATMA implement their proposed competency scheme/qualification. We would support that approach.]

8. District Heating System questions

8.1 Do you think questions DHS.1 and DHS.2 are sufficient to check if the pre-conditions have been met for a DHS measure, where applicable?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, please indicate if you believe questions should be added, removed, or changed.

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9. Room-in-roof insulation questions

9.1 Do you agree that the proposed questions will improve standards of installation for RIRI measures?

- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree

If not, please indicate with which questions you disagree and why.

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9.2 Do you believe that changing the existing RIRI questions from mid-installation to post-installation stage will enable the monitoring agent to better verify whether the RIRI has been correctly insulated?

- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree

If not, please explain why.

[At Ofgem's recent consultation workshop, it was suggested that the questions could apply at both Stage 2 and stage 3 with the response option of "Unable to Validate" being available for some questions. We would support this approach and think it would capture a wider, more reliable data set.]

10. Further questions

10.1 Do you agree with the introduction of the questions listed below?

Q1) *'FRI - Has the area between the wall and flat roof slab been insulated to prevent cold bridging?'*

- ☒ Yes
- ☐ No

Q2) *'PWI - Does the drilling pattern conform to the appropriate materials compliance certificate?'*

- ☐ Yes
- ☒ No

Q3) *'PWI - Have all injection holes been filled?'*

- ☒ Yes
- ☐ No

Q4) 'Air source heat pump - Does the heat pump provide working space heating in the domestic premises?'

☒ Yes

☐ No

Q5) 'Air source heat pump - Does the heat pump provide working hot water in the domestic premises?'

☒ Yes

☐ No

Q6) 'Ground source heat pump - Does the heat pump provide working space heating in the domestic premises?'

☒ Yes

☐ No

Q7) 'Ground source heat pump - Does the heat pump provide working hot water in the domestic premises?'

☒ Yes

☐ No

Q8) 'Biomass boiler - Does the boiler provide working space heating in the domestic premises?'

☒ Yes

☐ No

Q9) 'Biomass boiler - Does the boiler provide working hot water in the domestic premises?'

☒ Yes

☐ No

If not, please indicate with which questions you disagree, and why.

[Q2 and Q3 - This question cannot always be answered post-installation; often customers apply a finish to the wall prior to the inspection taking place (e.g. wallpaper). We ask that a response option of "Unable to Validate" be acceptable for this question.]

The following questions concern the entire set of technical monitoring questions. All current technical monitoring questions are listed in Appendix 2 of the consultation document.

10.2 Do you think we should change any of the existing technical monitoring questions?

☒ Yes

☐ No

If yes, please indicate which one(s) and explain why it should be changed.

[Question NB.1. Wording to be amended as follows: "Where a boiler and hot water storage vessel have

been repaired or replaced have any associated replacement pipes, or pipes that have been exposed as part of the works, or which are now accessible, which are within the building envelope been insulated where possible?". This change is recommended as we understand the question was not originally intended to encompass pipework outside the building envelope.]

10.3 Do you think we should change any of the existing technical monitoring questions?

☐ Yes

☒ No

If yes, please indicate which one(s) and explain why it should be changed.

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10.4 Do you think we should add any further technical monitoring questions?

☐ Yes

☒ No

If yes, please indicate what questions you believe should be added, and for what measure type.

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