

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 by 11 October 2016.

1. Respondent Details

Organisation Name:

[Bierce Technical Services]

Completed By:

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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 believe the failure trigger point should be lowered. With EPC's encapsulating so many variables, the scope for error / interpretation was significant, so 20% seemed appropriate. If deemed scores are introduced the proposed 6 questions will be all that is needed to determine the score. With so few variables a much higher success rate would be expected. We therefore believe the trigger point should be much lower than the 10% proposed, possibly reduced to 5%. A score in excess of this level would suggest extremely poor administration on behalf of the organisation involved or in extreme cases bad or fraudulent practice.]

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?

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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.

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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.

[Introduction of target ranges for C2 is essential for some measures. For example, for RiR you cannot adequately assess unless the entire job is monitored - C2 through to C3.]

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.

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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.

[We strongly disagree with removing the BPM questions. In fact we believe this element should be strengthened by making them compulsory. It is in all stakeholders interest, government, energy companies and customers to ensure that ECO products are delivered to the highest possible quality. Where issues have arisen these need to be captured so they can be resolved. For example, if a garden fence is taken down to install EWI and the installer has not returned to re-instate. Furthermore, there

will be no mechanism in place to capture customer complaints for outstanding remedial works and therefore leaving the industry exposed to poor practice.]

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 property type match the notified property 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.

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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.

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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.

[SWI requires two more questions. There are 5,400 deemed score permutations for SWI. The suggested 6 common questions are insufficient to adequately determine the score. Further questions are needed to assess: a) Pre and Post U-Value of the building and b) Property Age. We also recommend that evidence of the U-Value is made available for inspection and copies should be retained by the surveyor in case this is queried at a later date. U-Value evidence must come from a respected source e.g. BBA]

7. Suitable qualifications

7.1 Do you agree it should no longer be a requirement for a score monitoring agent to be an accredited DEA or equivalent?

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

If not, please tell us why you disagree.

[We strongly disagree with the proposed removal of the requirement for a monitoring agent to be an accredited DEA. Removing the need for any qualifications opens the door to inexperienced and potentially unscrupulous agents. All DEA's are qualified, vetted (basic disclosure) and undertake auditing as part of their accreditation. Many score judgements require individuals with property / construction expertise (e.g. SWI CWI, DH etc). DEA qualification should be the minimum requirement. Furthermore, the industry should strengthen this area and develop a platform that enables TM agents to share data with the accreditation schemes to ensure Ofgem can demonstrate that the industry can and does encourage improvement and development.]

Under the old deemed scores there was a facility for "oversized buildings" to be captured. Basically, if the property size was deemed to be outside of a deemed score range (determined by Sq m) then suppliers could claim additional carbon credits (per sq m). If this system is re-introduced, then controls will be needed to ensure it is not abused. With this in mind, it would be imperative that the TMA has the required skill set and so we would strongly advise that the minimum requirement in terms of accreditation would be a DEA.]

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.

[Agree, but that further questions are needed to ensure the DH system is operating after installation. DHS3 and DHS4 are not sufficient to ensure the DH system is installed correctly. Another question about the operation of associated heating controls should be added.. "can the system be operated as intended by using the heating controls.]

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.

[Mid-install questions are essential for RiR as explained in 3.1]

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.

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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.

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

☐ Yes

☒ No

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

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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.

[EWI installs - Have all exterior window and door seals been applied and finished off satisfactorily.]