

# 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](mailto:eco.consultation@ofgem.gov.uk) on **11 October 2016**.

## 1. Respondent Details

Organisation Name:

[Acrobat Carbon Services]

Completed By:

[Andy Clixby]

Contact Details:

[andy.clixby@acrobat.uk.com]

## 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?

[If the proposed changes to score monitoring questions happen, then yes. Otherwise, no. I think it would be prudent to see what actually happens and make a decision then as there will no doubt need to be a period of adjustment as people become used to inputting and monitoring deemed scores.]

**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?

[ ]

## 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.

[Yes, although I believe it would be beneficial for some form of root cause analysis to be included in Pathway A when the subset includes above a certain number of affected measures. A small installer submitting a low number of measures is always in danger of going on the Pathway, as can be seen by looking at some of the companies that have been on it, simply because the number of potential passes and fails is so small and the likelihood that there may only be one operative. With a larger installer with a greater number of measures and active operatives such analysis could indicate training issues within the company.]

## 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.

[ ]

**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.

[No. Some companies to operative a 100% mid-installation policy. Whilst this is not always logistically possible we see no reason to discourage it.]

## 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.

[The issues they address should be covered by the Installation and Safety questions. It could however be useful if Best Practice was retained as a catch-all concept that would allow those carrying out Technical Monitoring inspections the opportunity to note any concerns they may have at an installation

where a fail would be harsh but guidance would be helpful. This would be of particular benefit to smaller installers who can and do find themselves on the Pathway as the result of a single fail.

As the purpose of TM inspections is to drive up quality standards, simply removing the Best Practice questions may have an overall negative effect.

On occasions the Pass or Fail answers are too Yes or No, and an install could be deemed to have failed an inspection for something relatively minor; e.g. an installer not mortaring up one cavity injection hole behind a bin. I therefore have two suggestions:

The answer options could be Pass, Fail and Advise. The Advise would be treated as the same as a Fail but would only be considered one if the remedial works were not completed within an agreed time-frame.

A points system could be used for all fail types, e.g. one hole missed = 1 point, two holes missed = 5 points, three holes missed = 10 points. One air brick not sleeved = 5 points, one drill hole slightly off drill pattern = 5 points. Pass rate = 95 points out of 100.

Similar to Advise, remedial works should be completed and evidenced within an agreed timescale otherwise it is firmed up to a Fail.]

## 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.

[   ]

**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.

[It's worth stating that those questions cover what we feel is needed for score monitoring. Too often at present Scoring fails are used to cover other issues or are scored as fails simply because the person carrying out the inspection has not been provided with sufficient information beforehand and so can only base their response on the evidence they have.]

## 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.

[Q2: They're lofts, not time capsules. We have had plenty of cases where either the customer themselves or those carrying out work subsequent to the install of a measure have removed notices or interfered with insulation. The onus should be on the installer of the measure to show that when the measure was fitted the appropriate declarations were in place.]

Q3. Arguably this is an installation question as only a small amount of heat is lost through an uninsulated hatch. If the hatch is physically impossible to insulate this shouldn't result in a fail of any kind, never mind a scoring one. If however it is suitable and hasn't been insulated, this would be picked up as a conventional installation fail.

Q7 and Q8: This should be covered by installation questions.]

**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.

[ ]

## 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.

[No. Although I agree that a DEA qualification shouldn't be required, given the increased significance of the Pathway and the efforts that we and our partners and similar organisations have put into keeping installers from the Pathway it is vital that those carrying out monitoring duties are suitable qualified. They need to understand the importance and potential implications of their findings and have sufficient qualifications and experience to allow them to make sound judgement. I would recommend that the inspectors hold an appropriate ATMA (Association of Technical Managing Agents) accreditation.]

## 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.

[ ]

## 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.

[            ]

**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-inspection is only a snapshot of a small part of the installation, after all. The biggest issue of course with losing the mid-installation element is that an area may not be accessible once the works are completed e.g. if the customer has chosen not to have a permanent loft hatch installed. It is therefore vital that mid-install photos are taken to evidence hidden works. Also, I think it is necessary to include the word appropriate in the list of questions to recognise that an individual element may not have been insulated due to the agreed reasons as provided on the DOCC.]

## 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.

[ ]

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.

[HSNB.2 in particular is used as a catch-all for several different fail types.]

**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.

[ ]

**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.

[Although I appreciate that Ofgem target carbon issues in their TM questions, I believe that Safety Questions should be judged equally.

I consider the lack of a primary combustion vent (currently as safety fail and not eligible for the Pathway) to be far more serious than not mortaring one cavity injection hole (which would put a small installer on to the Pathway.)]