

# 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:

[ROCKWOOL Limited]

Completed By:

[N Ralph]

Contact Details:

[nick.ralph@rockwool.com 07970 142896]

## 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 that the failure trigger point for score monitoring should be set at 5% and additionally, at this point, an assurance letter required from senior management (similar to the existing 'Pathway B' improvement plan). In our opinion, the proposed 10% failure rate is far too high to be allowed to continue unmonitored and uncontrolled.]

**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?

[We consider that measures should be classified 'high concern' if the monitoring failure rate reaches 10% and that this should trigger a 'Pathway A' improvement plan. We question whether an installer operating at the proposed failure rate of 25% should be viewed as fit for this type of work, either because of a lack of competence or deliberate misrepresentation.]

## 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.

[We agree that the additional assurances should be based on which pathway an installer is placed on. However, we consider that measures should be classified 'high concern' if the monitoring failure rate reaches 10% and that this should trigger a 'Pathway A' improvement plan. We question whether an installer operating at the proposed failure rate of 25% should be viewed as fit for this type of work, either because of a lack of competence or deliberate misrepresentation. Furthermore, we believe that the failure trigger point for score monitoring should be set at 5% and additionally, at this point, an assurance letter required from senior management (similar to the existing

'Pathway B' improvement plan). In our opinion, the proposed 10% failure rate is far too high to be allowed to continue unmonitored and uncontrolled.

Additionally, the Pathways and associated remedial actions should differentiate between lack of competence and attempted fraud, which should be assumed in cases of repeated, manifestly incorrect scoring.]

### 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 that target ranges should be introduced to ensure that a greater number of mid-installation inspections are carried out. Additionally, we believe that it is important to introduce pre-installation inspections for measures such as cavity wall insulation, party wall insulation, solid wall insulation and room-in-roof insulation. These additional inspections are necessary to help ensure that each property has been appropriately inspected and assessed and that any necessary remedial works have been carried out prior to these measures being installed. Recent research by BRE has shown that many potential, significant problems and shortfalls in performance can be avoided if buildings are appropriately surveyed and assessed prior to installation of measures - and that these inspections and assessments are not always carried out. We recommend that pre, mid and post installation targets are set, with approximately 20%:40%:40% of inspections required at each stage, respectively.]

**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.

[We support the introduction of mid-installation inspection targets for SWI, FRI and UFI and recommend that mid-installation targets should also be introduced for party wall, room-in-roof and

park homes measures. Mid-installation and indeed pre-installation inspections are as important for these measures as they are for SWI, FRI and UFI.]

#### 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 do not agree that these questions should be removed. The inclusion of these questions helps to foster the principles and benefits of adopting best practice whereas their removal suggests to installers that these principles are not important. It would be preferable to make these currently voluntary questions mandatory rather than removing them. ]

#### 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.

[We believe that the questions provided for SWI, LI, UFI, and PWI in the consultation document should be applied to room-in-roof insulation and park homes, together with supplementary questions as relevant. Room-in-roof insulation and park homes are not discrete, individual measures and need to be assessed against each of their constituent measure types.

Furthermore, we consider that the following question should be added for all measures; "Is there evidence that each individual property has been assessed as being suitable in its current state for the measure installed?". As outlined in our responses to the questions above, the quality and thermal performance of installed measures can be significantly improved through the inclusion of pre-installation assessments and inspections.]

## 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.

[We believe that the questions provided for SWI, LI, UFI, and PWI in the consultation document should be applied to room-in-roof insulation and park homes, together with supplementary questions, as appropriate. Room-in-roof insulation and park homes are not discrete, individual measures and need to be assessed against each of their constituent measure types.]

**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.

[We believe that the questions provided for SWI, LI, UFI, and PWI in the consultation document should be applied to room-in-roof insulation and park homes, together with supplementary questions as relevant. Room-in-roof insulation and park homes are not discrete, individual measures and need to be assessed against each of their constituent measure types.]

## 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 do not agree that it is no longer necessary for a score monitoring agent to have DEA accreditation or similar qualifications. We strongly believe that the ECO monitoring rules should define the minimum levels of competency necessary for monitoring agents. It is neither sufficient nor appropriate to allow undefined or unskilled agents to assess complex building characteristics, for example those associated with room-in-roof and park home applications.]

## 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.

[We do not believe that the proposed questions will substantially improve standards of installation for RIRI measures. We believe that in order to improve standards, additional questions taken from the consultation document should be added, which reference the individual measure types that make up RIRI (particularly loft, party wall and stud wall insulation).]

**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.

[We do not believe that changing the existing RIRI questions from mid to post installation will enable the monitoring agent to better verify whether the RIRI has been correctly installed. We believe that the absence of mid-installation monitoring will make it more difficult to determine which measures have been correctly installed. This is because, at the post-installation stage, many measures will have been obscured by plasterboard and other finishes, which do not allow party wall insulation, stud wall insulation and other measures to be checked. Our view is therefore that mid-installation monitoring should be required, equal to post-installation monitoring.]

## 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.

[With reference to the technical monitoring (TM) questions provided in the consultation document, we suggest the following amendments:

EWI.1 - Changes are being proposed by the PAS2030 SWI Measures Expert Group, which will require there to be at least one operative per site who is carded to supervisor level. Furthermore, at least one in four operatives will be required to be carded. The TM questions should therefore help to verify that:

- There is at least one carded Operative per 'site', carded to Operative or Supervisor level (where a 'site' is an individual home or property).
- There is at least one carded Supervisor per 'location' (where a 'location' may comprise multiple individual sites).
- There are no fewer than one carded Operatives for every four Operators at every site and every location.

EWI.1 - "PAS2030:2014" should be changed to "PAS2030" (removing the date to ensure that the current version of PAS2030 applies)

EWI.2 - This question should be amended to "Have both the pre-installation building condition survey and the pre-installation building type survey been completed fully in accordance with PAS2030?" (Note PAS2030 date removed).

EWI.4 - References to other utilities such as gas and electricity need to be included in this question, not just telecommunications.

EWI.7 - This question should be replaced with "Are the minimum dimensions of any cut boards, and the fixing pattern used, in accordance with the system certificate?".

IWI.1 - Changes are being proposed by the PAS2030 SWI Measures Expert Group, which will require there to be at least one operative per site who is carded to supervisor level. Furthermore, at least one in four operatives will be required to be carded. The questions should therefore help to verify that:

- There is at least one carded Operative per 'site', carded to Operative or Supervisor level (where a 'site' is an individual home or property).
- There is at least one carded Supervisor per 'location' (where a 'location' may comprise multiple individual sites).
- There are no fewer than one carded Operatives for every four Operators at every site and every location. ]

**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.

[We suggest that the following amendments be made to the technical monitoring (TM) questions provided in the consultation document:

EWI.1 - Changes are being proposed by the PAS2030 SWI Measures Expert Group, which will require there to be at least one operative per site who is carded to supervisor level. Furthermore, at least one in four operatives will be required to be carded. The TM questions should therefore help to verify that:

- There is at least one carded Operative per 'site', carded to Operative or Supervisor level (where a 'site' is an individual home or property).
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IWI.1 - Changes are being proposed by the PAS2030 SWI Measures Expert Group, which will require there to be at least one operative per site who is carded to supervisor level. Furthermore, at least one in four operatives will be required to be carded. The TM questions should therefore help verify that:

- There is at least one carded Operative per 'site', carded to Operative or Supervisor level (where a 'site' is an individual home or property).
- There is at least one carded Supervisor per 'location' (where a 'location' may comprise multiple individual sites).
- There are no fewer than one carded Operatives for every four Operators at every site and every location.]

**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.

[We believe that the following questions should be added for EWI:

"Have all details been designed and installed to minimise the risks of cold bridging, for example by removing, relocating or extending where feasible structures such as meter boxes, pipework, flues and roofline details to allow continuity of insulation?"

"Have window and door reveals been insulated with L-shaped pieces, which avoid joints in the insulation adjacent to the reveal corners?"

We believe that the following questions should be added for IWI:

"Have all details been designed and installed to minimise the risks of cold bridging, for example by removing, relocating or extending where feasible structures such as meter boxes, switches, sockets, radiators, pipework, flues, ducts, etc?"]