

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:

[Npower]

Completed By:

[Andrew Powell]

Contact Details:

[andrew.powell@npower.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?

[]

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.

[]

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.

[The proposed introduction of target ranges for mid-installation inspections does not satisfy the aim of simplifying the monitoring process. The existing recommendation to split monitoring between mid-installation and post installation is more simple and effective.]

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.

[Retention of the existing recommended split between mid-installation and post-installation Technical Monitoring would maintain greater simplicity.]

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.

[]

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.

[]

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.

[]

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.

[]

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 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.

[]

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.

[]

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.

[]

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.

[EWI.1, EWI.2, EWI.3, EWI.4, EWI.5, EWI.6, EWI.7, EWI.8, EWI.9, EWI.10, EWI.11, EWI.12, FRI.1, FRI.2, FRI.3, FRI.4, IWI.1, IWI.2, IWI.3, IWI.4, IWI.5, IWI.6, LIR.2, LIR.4, LIR.5, PWI.1, PWI.2, PWI.3. The existing ECO Guidance requires Obligated Suppliers to ensure that the installation of a measure is carried out in accordance with the relevant standards. How this is demonstrated depends on whether or not the particular measure is referred to in the Publicly Available Specification 2030:2014 Edition 1 (PAS). If a measure is referred to in PAS, the installation of the measure must be carried out in accordance with the provisions of PAS, building regulations and any other regulations that relate to the installation of the measure. Compliance with the provisions of PAS can be demonstrated where the installation is carried out by a PAS-certified installer. Installers can be certified by independent third parties according to the requirements of Publicly Available Specification 2031:2015. Mid-installation competency inspections involve Technical Monitoring Agents assessing whether measures are being installed in accordance with PAS 2030:2014. Npower would welcome further consideration of alternative arrangements for such Technical Monitoring requirements in future Obligations. Perhaps the coordination and administration of the mid-installation competency monitoring process may be completed by the Independent Third Parties who certify the installers and the Technical Monitoring Agents who monitor those installers. This would remove some of the existing complexity provided by the current requirement on Obligated Suppliers to monitor the PAS2030 Certification scheme, and to resolve any associated concerns. The removal of any requirement on Obligated Suppliers to deliver Technical Monitoring which relates directly to the provisions of PAS2030 may enable greater simplicity in the overall delivery of ECO. Obligated Suppliers could continue to demonstrate compliance with the provisions of PAS where the installation of a measure is carried out by a PAS-certified installer as suggested within existing Guidance. This enhanced provision of monitoring results and data for the independent third parties that certify installers, and in relation to those certified installers, may provide further satisfaction that standards of installation will improve. There may be other cases of where technical monitoring questions are duplicating other industry body certification and auditing programmes. Particularly TM Questions; BR.1, NB.1 and NB.2.]

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.

[]

