

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:

[Cavity Insulation Guarantee Agency]

Completed By:

[Gerry Miller]

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 that trigger points should be consistent, and particularly if deemed scores are adopted then the fact that RdSAP inputs will not be relevant means that errors in scoring should anyway reduce.]

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 believe that given the simple and non subjective (ie fuel, number of bedrooms) score monitoring questions that 25% is far too high, and that anything over 10% should be treated as of 'high concern'. This would also allow for further simplification through adoption of a single Pathway (A) in the event the trigger was exceeded providing complete clarity on the implications.]

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.

[As noted we favour simplification and adoption of a single pathway. However, in the case of repeated failures indicating potential fraud rather than incompetence then further sanctions should be available and signposted in guidance.]

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.

[Mid installation inspections are not relevant to CWI. However, in the case of fabric measures we would support a requirement that all pre installation assessments of suitability should be independently verified by desktop or equivalent review and that, additionally, 10% of CWI measures should be subject to independent inspection prior to treatment.]

This would ensure that funding was only provided for properties that were suitable to receive a measure, significantly reducing the number of measures where carbon savings were not delivered for the full lifetime due to subsequent issues.]

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.

[ECO TM represents the single largest opportunity to check the work of installers. Therefore, although best practice monitoring was rarely followed, we believe that the TM questions require fundamental realignment to reflect real life risks, for example in relation to safeguarding vents, and we cover this in the relevant section 10.4.]

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.

[For the reasons stated earlier, we would also suggest inclusion of a question 7, "Is there evidence that the property has been assessed as suitable to receive the measure".]

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.

[For the reasons stated earlier, we would also suggest inclusion of a further question in respect of fabric measures, "Is there evidence that the property has been assessed as suitable to receive the measure".]

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.

[Although the proposed simplification of scoring through adoption of deemed scores greatly simplifies the process, we firmly believe that the ECO Guidance should continue to define levels the required levels of competency. Continuing to specify a DEA or equivalent ensures that the SMA has the competency and through accreditation is subject to independent oversight/audit.]

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.

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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.

[We have some concerns regarding the practicality of the PWI questions, as installation could be internally, in which case depending on decorations drill points may not be apparent, or by chance, in which case drill pattern is less relevant. However, we will consider this matter further.]

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.

[Questions C1.1, C1.2 and C1.3 relate to detailed consideration of the suitability of the property, but do not consider all factors, which would go beyond the investigations that could reasonably be expected to be undertaken by a TMA. Therefore we would suggest replacing C1.1 - C1.3 with "Cx Is there evidence that the pre installation assessment of suitability has been subject to independent verification by desktop or equivalent review by a competent person"]

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.

[ECO TM represents the single largest opportunity to check work, yet the monitoring questions do not currently look at key indicators of real life failure modes which could point to future problems with a

measure. This is a missed opportunity to further improve the quality of work, ensure that carbon savings are delivered and protect consumers.

Therefore our recommendation is that the Ofgem technical monitoring questions for CWI should be expanded to include simple, non invasive, checks for the following, which CIGA's data shows can lead to problems arising which could lead to underdelivery of carbon:

- o Are redundant Cavity vents correctly sealed;
- o Have Underfloor vents been safeguarded;
- o Have Combustion vents safeguarded;
- o Is there any evidence of injection points in close proximity to combustion flues;
- o Have room vents been fitted to provide combustion air where required;
- o Is there any evidence of the escape of insulation;
- o Do ground levels indicate adequate clearance in relation to the DPC;
- o Sheds, buildings or plantings abutting treated elevations;
- o Are there signs of existing damp or condensation issues.

Finally, we would also encourage checks being made at higher levels of the building, rather than just at ground floor]