

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 on **11 October 2016**.

1. Respondent Details

Organisation Name:

Completed By:

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?

Agree, subject to Ofgem's confirmation that there are no scoring questions for non-deemed score measures such as DH.

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?

Agree with installers who deliver over 100 measures but believe this approach needs to be re-considered for installers who deliver less than 100. See attached. (364 installers have delivered less than 100 measures for British Gas in at least one of the quarters of ECO2)

British Gas would welcome the opportunity of working with Ofgem on defining the rules for small installers.

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.

Agree, however it would be useful if Ofgem provided a brief of the minimum level of detail required along with a standardized template.

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.

Agree with the principle; however we are unclear what the consequences would be of not achieving the target ranges

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.

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 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.

Agree, however we ask that Ofgem provide further guidance on Q4 to clarify when a bedroom is classed as a bedroom and to clearly define the meaning of "reasonable" in Q5 and Q6.

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.

Q1 - Agree, subject to clarification from Ofgem on how too evidence what product was used without conducting an intrusive survey.

Q3 - Disagree - we feel this question would be better sat under Technical because any failures could be remediated.

Q9 - Disagree - boiler and heating controls are classed as 2 separate measures therefore should be covered under HC only.

Q11 - Disagree – We feel this question would be better sat under technical and could be changed to state “has the RIR been installed as per the Ofgem guidance.” Should this question remain, further guidance needs to be issued in terms of RIR and residual loft space.

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

- Disagree - We believe that mandating the experience, knowledge and technical skill of the DEA provides assurance of their ability to carry out TM visits accurately. We also understand that there are multiple bodies (e.g. Bonfield Review, ATMA, NIA) looking to recommend/define/mandate a technical qualification, but would recommend that this is kept as a minimum until the legislation or administrator guidance reviews and publishes the minimum requirement.

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.

Agree- We have reviewed the proposed questions and these are in line with the new guidance issued. Ofgem could ask an additional question "has the RIR been insulated in accordance to the guidance issued in July 2016?"

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.

Relying on C3 inspections will require an intrusive survey which will increase cost of visit.

Disagree - We believe that this will potentially increase TM false failures. British Gas has requested where possible that Installers undertake 100% C2 visits to provide additional assurance. Relying on C3 inspections will require an intrusive survey, have H&S implications and will increase the cost of the visit. We would recommend that the C2 questions remain, and are repeated at C3 stage to ensure all elements are captured.

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.

Q1: In general yes. However, there needs to be an exception as it is not always practical to insulate up stands in all cases because services or other protrusions can restrict access.

Q2 & Q3 – Disagree. This would result in failures if the customer has applied a finish to the wall (e.g. wallpaper). To retain, we would recommend “unable to validate” is added as an option.

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 change any of the existing technical monitoring questions?

☐ Yes

☒ No

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

Duplicate question

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.