



Consultation Question	Comments
1. Do you agree with our proposal to create three new fields in the notification template to capture an installer's TrustMark license number, lodged certificate ID and TrustMark Unique Measure Reference Number for verification purposes? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Installers need to have evidence of Independent Surveillance of Assessments to include CWI, Room in Roof, Park Homes, Internal and Hybrid Wall Insulation. This is a key protection for these measures and thus think a Unique ISA reference should also be captured in the notification template which could be validated against the awarding body records
2. Do you agree with our proposal to verify certain data fields with TrustMark's Data Warehouse? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Yes, without verification the control would be weak.
3. Do you agree with our proposal on how the transition of appropriate guarantees will be carried out? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	The transition to Trustmark seems straight forward however Identification of how current providers that meet the OFGEM requirements for an "appropriate" guarantee will be able to ensure access to discuss any proposed future change when moved under Trustmark in the future is far from clear. A panel is being proposed which, no doubt will be similar in structure to the original Each Home Counts panel that was skewed by Insurance only providers and will be left to influence future direction of an appropriate guarantee. Several of the not for profits will have no access for input to the decision making moving forward leaving the path clear for the same biased process to take place once again. We believe that some of the ideas now proposed (2 year guarantees and mandatory deposit insurance) are, at best, focused on what is best for the providers, and not for the consumers and at worst, has potential to open the scheme up to becoming the next PPI scandal. It needs to be agreed formally that prior to any handover a robust process is in place to ensure that the two routes currently allowed under OFGEM have the same influence with Trustmark in setting any future direction.
4. Do you agree with our proposal that suppliers will be required to conduct technical monitoring and score monitoring until TrustMark are able to take full responsibility of the process? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Yes. If Trustmark are charging for the service in the interim within the lodgement fee, this element of the fee needs to be discounted until Trustmark take over the running of technical monitoring.
5. Do you agree with our proposed approach to the administration of FTCH insulation requirements? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	No, we see no reason why the FTCH requirements cannot include solid wall as an option alongside cavity wall. This would widen the options available and reduce the risk of an unsuitable cavity measure being installed to enable the boiler.
6. Do you agree with our proposal that weather / load compensation should be a stand-alone measure type, rather than the savings being included in scores for installing gas and LPG boilers? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	N/A
7. Do you think that a change in approach is necessary for scoring multiple measures? If so, please indicate your alternative approach, including any evidence, to support your response.	We would favour simplicity and avoid any requirement to rescore measures. However, there should be a simple inclusion of insulated V uninsulated when scoring boilers, in addition, this would help reduce the chronic oversizing of boilers in insulated properties that make them less effective and would balance the boiler carbon saving V Insulation measures.



<p>8. Do you agree with our proposal to split out the existing underfloor insulation score into solid underfloor insulation and suspended underfloor insulation? If you disagree, please provide alternative suggestions, including any evidence to support your response.</p>	<p>Yes. Each requires a different technology and would have significant risks if assumed one measure. Work is required to develop the needed Best Practice guidance and criteria to qualify for award of a Guarantee. Therefore, we believe that it is both inevitable and welcome that greater documentation will differentiate the approaches to insulating floors. In addition, suspended underfloor should be linked to the requirement to carry out a wall measure (PAS 2035 interaction matrix) or deal with the cold bridge at the joist ends, underfloor insulation on its own will not work and this needs to be made clear via future guidance</p>
<p>9. Do you know of any other situations where failed cavity wall insulation would need to be removed that we should be aware of that would help us to clarify the guidance? If so, set out any examples, and provide supporting evidence as required.</p>	<p>We support the principles that extraction is not a qualifying measure, and that where an appropriate guarantee is in place then this is the appropriate route to rectify any defects.</p> <p>However, assuming appropriate routine building maintenance has been carried out CWI should last the lifetime of the building, and we are concerned that the proposals could lead to abuse and the wholesale and disruptive poor-quality extraction and retreatment of properties simply because the guarantee had expired.</p> <p>Consequently, we do not believe that the reliance on industry agreeing a definition for a ‘suitably qualified professional’ is enough to safeguard against this risk.</p> <p>Based on our experience we also believe that there are very few situations where extraction and retreatment is appropriate, as best practice guidance provides that evidence of a previous failure would be a strong contra indication that the property was suitable for re-installation with CWI.</p> <p>However, assuming that it could be demonstrated that replacement was necessary, then to avoid additional problems being created as a result of incomplete extraction it is essential that any such work was accompanied by an extraction certificate including photographic evidence that no insulation or debris remained in the cavity. Additionally, where a re-treatment was proposed then it would also be essential that proof that Independent surveillance of the suitability assessment had been completed prior to treatment, as required by PAS 2030:2017/2019, was provided as part of the evidence.</p> <p>In the specific case of extraction and retreatment with EWI then possible circumstances where this was appropriate might include;</p> <ol style="list-style-type: none"> <li>1) Properties in severe exposure zones and subject to water penetration.</li> <li>2) Properties where spalling of brickwork was leading to water penetration.</li> <li>3) Properties where the construction and condition of the walls meant that remediation was not possible.</li> </ol>
<p>10. Do you know of any heat sources which would fall within the ‘Gas room heaters’ pre main heat source category which are not fuelled by mains gas? If you do, please provide evidence to support your response.</p>	<p>N/A</p>
<p>11. Do you know of any other categories of HMO that we should be aware of that would help us to</p>	<p>Base it on the resident having a separate front door and letter box</p>



clarify the guidance? If so, set out any examples, and provide supporting evidence as required	
12. Do you agree with our proposal to rename the measure categories and to move the measure types “Cavity Wall – External Insulation” and “Cavity Wall – Internal Insulation” into the measure category “Cavity Walls”? If you disagree please provide alternative suggestions, including any evidence, to support your response.	<p>We do not agree with this.</p> <p>External wall and Internal wall measures are applied to many different wall substrates but need to meet the requirements for the measure being installed which has rules about the substrate it is being applied to. Changing the categories will confuse the issue. If EWI or IWI are being applied to a cavity wall, the retrofit coordinator should be aware of the unique challenges and requirements applying either of these measures to it would bring and should reference the measure and its guidance. ECO is base on the delivery of measures and the quality frame works are designed around the measure, thus should change to: Cavity wall Insulation, External Thermal Insulation System and Internal wall insulation system. The latter two can be applied to most wall types subject to industry rules. Cavity is one of over 200 non-traditional* types of wall considered for Solid wall and IWI. *(non-traditional term relates to EWI and IWI and has guidance for each)</p>
13. Do agree that the approach of introducing a separate and transparent behavioural usage factor would be an effective way of recognising that systems might be turned off or removed? If you disagree please provide alternative suggestions, including any evidence, to support your response.	<p>Yes, providing this is evidenced based<sup>1</sup>. Why does this not include boilers where heat exchanger efficiency drops after a period of a bout 5 years? or cases where the homeowners do not service the boiler?, is this built in.</p>
14. Are there any areas where you think further guidance would be useful?	
15. Do you have any further comments on our proposed administration for ECO3?	
16. Did you use our response tool? If not, please could you outline the reasons for not using the tool?	

<sup>1</sup> DECC Smart Metering Early Learning Project