

# Energy Company Obligation (ECO) U-Value Consultation Questionnaire – Feb 16



Making a positive difference  
for energy consumers

## Background

The questions below relate to the consultation on requirements for over-writing U-values for cavity wall insulation measures which can be found on our website :

<https://www.ofgem.gov.uk/publications-and-updates/eco2-consultation-requirements-overwriting-u-values-cavity-wall-insulation-measures>

Our proposals consist of three main parts:

- a. introducing an upper limit for overwritten U-values,
- b. stipulating the evidence that we expect to be in place when a U-value is overwritten and how we expect inputs to be collected, and
- c. a regime to monitor these measures; we suggest three approaches for implementing monitoring.

## 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. If you do not wish to answer a question please select 'N/A'. The questionnaire should be completed in typeface and returned via email to [eco.consultation@ofgem.gov.uk](mailto:eco.consultation@ofgem.gov.uk) by close of play **7 March 2016**.

## Respondent Details

Organisation Name:	The Warmfront Team Limited
Completed By:	Alexander M H Hearn (Managing Director)
Contact Details:	alex.hearn@warmfrontteam.co.uk

## 1. U-value Limit

**1.1** Do you agree that it is unreasonable for the U-value of a cavity wall measure to exceed 1.6 W/m<sup>2</sup>K in premises in the age bands B-K?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide details and supporting evidence for your response below.

it's a difficult one. Every property is individually built and I have found vast amounts of properties within these age bands that aren't within building regulations or that meet the set age band u value regs. This can be because they are built poorly, built by "cowboy" firms or simply haven't been insulated properly at build. I would strongly implement that only properties built after 1983 are allowed to have a u value override.

**1.2** Do you agree that we should implement a limit of 1.6 W/m<sup>2</sup>K for overwritten U-values for cavity wall measures in premises in age bands B-K?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide details and supporting evidence for your response below.

A 1.6 limit is sensible and in over 5000 over riding u values we have never exceeded this. Again, I do not see a need to override a uvalue prior to 1983. I do strongly think that post 1983 properties require u value override as without this we simply cannot generate a cavity wall recommendation, which without would eliminate 100,000's of uninsulated cavities.

## 2. Evidence Requirements

**2.1** Do you agree that relevant inputs should be collected for the U-value calculation via an intrusive inspection, using a borescope for example?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Yes, I have attached our audit and compliance process, which is adhered to on all post 1983 properties we survey.

**2.2** What types of evidence do you suggest would support the inputs used for a new U-value calculation?

Please provide reasons for your response below.

See our audit process attached

**2.3** Do you agree that the types of evidence listed in paragraph 2.5 are practical to provide?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know

N/A

Please provide reasons for your response below.

I think with a suitably qualified DEA, OCDEA and chartered surveyor all inspecting the properties prior to install that an additional view is not essential. Particularly, with the evidence provided on each job (photographs/site notes etc)

**2.4** Do you agree that the evidence listed in paragraph 2.5 is sufficient to support an overwritten U-value?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Yes, this is the process we currently adapt. See attached correspondence

**2.5** Do you agree that the inputs for a U-value calculation should be collected by an independent person to increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

I do not think this is a positive in any way nor is it cost affective or time effective. I do not think this will help the customers journey particularly with the other visits that take place prior to install (Tech survey, DEA EPC, Chartered surveyor)I think it will also be difficult to monitor the "independence" of the person chosen to complete this.

**2.6** Do you agree that an independent person collecting the inputs for a U-value calculation would be practical to implement taking into consideration cost, time and customer journey implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

As above

### 3. Option 1 – Additional Monitoring Questions

**3.1** Do you agree that option 1 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Currently adapt this process so strongly agree.

**3.2** Do you agree that option 1 would be practical to implement, taking into consideration cost and time implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

Yes, as this can be completed by either DEA, OCDEA or chartered surveyor on site visit.

**3.3** Do you agree that a score monitoring agent is suitably qualified to answer the proposed questions relating to the U-value inputs?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

As stated every property is individual and only an OCDEA who is qualified in this field should authorise the u value input.

**3.4** Do you agree that the proposed additional score monitoring questions are appropriate for identifying where overwritten U-values are incorrect?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

**3.5** Are there any additional questions that you think would help to identify inaccuracies in overwritten U-value calculations?

Please provide reasons for your response below.

**3.6** Can you please estimate how long you think it will take for these new questions to be implemented into your systems?

Please provide reasons for your response below.

Immediately as currently adapting the majority of this process.

**3.7** Do you foresee any issues if the questions were implemented during a monitoring quarter?

- Yes
- No
- Don't Know
- N/A

Please provide reasons for your response below.



#### 4. Option 2 – Ongoing Monitoring

**4.1** Do you agree that option 2 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

**4.2** Do you agree that option 2 would be practical to implement, taking into consideration cost and time implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

**4.3** If we were to implement a new monitoring regime in order to verify the accuracy of overwritten U-values for CWI measures, do you agree with the sample size and reporting timeframes outlined in paragraph 2.12?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

## 5. Option 3 – Audit Regime

**5.1** Do you agree that option 3 would increase confidence in the accuracy of overwritten U-values for CWI measures?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

**5.2** Do you agree that option 3 would be practical to implement taking into consideration cost and time implications?

- Strongly Agree
- Agree
- Neither Agree Nor Disagree
- Disagree
- Strongly Disagree
- Don't Know
- N/A

Please provide reasons for your response below.

--

<b>6. Additional Questions</b>
--------------------------------

<b>6.1</b> Do you have concerns with U-values being overwritten for other ECO measure types?
--

Please provide details and supporting evidence for your response below.
---

<b>6.2</b> If you do not agree with any of proposals outlined, could you please suggest an alternative approach which you consider would provide assurance that U-values are being accurately overwritten for CWI measures?
---

Please provide details and supporting evidence for your response below.
As stated previously, I strongly believe that u value overriding should only take place on cavity wall measures in properties built after 1983. With the process we have adapted and the monitoring we have in place accurate and true u values can be achieved within cost and time implications.

<b>6.3</b> Do you agree that the proposals outlined above will enable U-values to continue to be overwritten for CWI measures where this is appropriate?
--

Please provide reasons for your response below.
Yes, where necessary and compliantly.

