

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:

[Association of Technical Monitoring Agents (ATMA)]

Completed By:

[John Whitefield]

Contact Details:

[john.whitefield@atma.org.uk]

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?

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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?

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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.

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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.

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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.

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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.

[OBSERVATION: Question 4: We believe that there will need to be greater clarity around the interpretation of what constitutes a bedroom. The way residents use certain rooms in homes, and indeed change their use, is open to interpretation by both surveyors, installers and inspectors. For instance, a spare bedroom as defined by one person may be termed a second living room by another. This may introduce failures that are nothing more than differences of opinion, leading to unnecessary administration and costs if not made explicitly clear. We welcome the clarification in the Deemed Scores Response regarding conservatories, however feel that further clarity is required.

Questions 5 and 6 - We understand the purpose of differentiating between what is essentially the proportion of the available measure that could be installed and the proportion of the actual property that has been treated and agree with the principle of doing this. The additional information provided in the Deemed Scores Consultation also helps to clarify this. However, we do not believe that the supply chain will easily be able to interpret the meaning of the questions as written. In addition, 'reasonably reflect' will be difficult to determine and is likely to be disputed. We would prefer this to be defined, for example as 'within a 10% tolerance level'. We propose the following wording changes, that we believe reflects more clearly the meaning of the questions:

Question 5: Does the percentage of the measure installed reasonably reflect the percentage of the measure claimed?

Question 6: Does the percentage of the property treated reasonably reflect the percentage of the property claimed?

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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.

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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.

[Question 1: It is not possible to verify the product installed with any certainty without intrusive drilling and sampling. From the drill pattern it is possible to determine whether a bead or a fibre product has been used, however beyond that the subtleties in drill pattern between various systems are too fine to be detectable to all but the most experienced of cavity wall operatives. The scope of the inspection could be extended, and many TMA's would have the skills and knowledge to undertake an intrusive survey. This would however increase the costs of the service, due to time on site and therefore the benefit of increased cost versus the value of the information gained from intrusive surveys, needs to be weighed up.

Question 2: OBSERVATION: We are presuming that a new form of pre-existing insulation level declaration will be produced to align with the new deemed score categories as currently the only one in

existence relates to virgin lofts. Assuming this will exist, we need to ascertain what will constitute a fail. For example, customers will often remove or mislay such documentation. If the TMA cannot verify it on site and has not been provided with a copy previously (which is unlikely) then the question will fail as there is currently no option to answer 'unable to validate'. In order to avoid time consuming challenges and appeals for all concerned the information should be captured up front by the funding party and evidence secured prior to the TMA's visit.

Question 11: OBSERVATION: The question itself is valid, however in order to valid this, the method of sharing data with Technical Monitoring Agents needs to be improved. Often the TMA will not get that level of detail relating to an associated measure, and without it, it would not be possible to verify. This can be down to the limitations of the software utilised by the supplier, therefore a common minimum data content provision should be agreed such that all TMA's acting as independent monitoring receive the same level of data on which to base their inspection visit.]

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.

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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.

[We agree that, in the light of deemed scores, it is not necessary to be DEA qualified to respond to these questions. However, in general terms, we believe it is important for quality, consistency and for the reputation of the industry to require some form of qualification or accreditation for TMA's. We believe that this should be a demonstration of competency via proof of qualifications, experience and technical knowledge. ATMA is developing, in consultation with Ofgem and Energy UK, a minimum competency level for TMA's undertaking inspections on each individual ECO measure and will be utilising this to introduce a recognised competency scheme for Technical Monitoring Agents. This will be in place prior to April 1st 2017 and will incorporate a photo ID card for each individual Inspector which will clearly illustrate the measures that each individual is competent to inspect. This will maintain quality levels within technical monitoring and could reduce the administrative burden on obligated suppliers who each currently repeat this type of competency verification in different forms.]

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.

[OBSERVATION: The proposed questions certainly clarify to all participants what elements of a RIRI measure must be insulated to claim 100%. They may also improve standards for RIRI measures, however any improvement is down to the individual scheme participants and how they utilise this information, train their staff, communicate expectations and monitor performance within the supply chain.]

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.

[COMMENT: We believe that the existing questions should be included both at mid and post installation monitoring. The reason for this is two-fold; at present on post installation visits many quality failures encountered are not recorded due to the absence of an appropriate question (currently they are recorded under SMQ.24 which relates to the percentage of the measure installed and is a scoring failure). Secondly, it is not always possible for the answer to be determined at mid-installation stage. The timing of the visit and progress of the installation mean not every TM visit can encompass all of the key elements of the installation (without the impractical and costly exercise of the TMA remaining on site for the duration of the installation). One of our members has expressed additional health and safety concerns in relation to post installation monitoring in residual loft areas that have been insulated. This needs to be considered by the obligated suppliers / Energy UK to ensure that the scope of the inspection is agreed by all parties and any associated Risk Assessments and Method Statements and

insurance coverage are considered as part of this process.]

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.

[Comment: Q1) It may be advantageous to add an unable to validate option as from a practical perspective it may be difficult to validate the presence of insulation in this area on multi storey properties if not visible from the ground with a set of binoculars.]

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.

[BR.1 and N.B.1 - We think that the current wording should be changed to read: Where a boiler AND / OR hot water storage vessel have been repaired or replaced, have any associated replacement pipes or pipes that have been exposed as part of the works or are now otherwise accessible been insulated where possible? This is to allow the question to cover instances if a boiler only or a hotwater cylinder only have been replaced.]

ESHR.2 - Does the Electric Storage Heater activate and produce heat? The true way to validate this is to turn on the heat, this may or may not be possible at the time of the inspection. For example, the customer may not have the unit switched on in summer so an Economy 7 meter may not be charged. If this is the case, the customer confirming this verbally would need to be relied upon.

EWI.16 Have window and door reveals been insulated? There needs to be an n/a option on this question as in many cases there is not enough space to insulate the door and window reveals without restricting their opening, therefore a negative response currently indicates a failure status which can be unfair on the contractor.

IWI.5 Where services have penetrated the vapour control layer have these been sealed appropriately? This requires a n/a answer to be added as it is only relevant to some products.

IWI.6 If the floor is suspended timber, is the insulated dry lining bedded on a strip of pre-compressed expanding foam nailed to the floor? This also requires a n/a answer to be added as for certain products this is not relevant e.g. Matilda's Blanket.

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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.

[As previously suggested we feel that the current C2 technical questions listed in Appendix 1 should be repeated at C3 stage. The current question set for C3 post installation inspections does not allow the TMA to record a failure in examples where the insulation is not complete or poorly fitted. This means that SMQ24. is currently utilised as a proxy which currently results in a Scoring Failure as opposed to a Quality failure. In addition we would recommend that the following individual technical quality questions be added to specifically cover each element of the Room in Roof measure:

- Has insulation been installed to dormer window cheeks and ceiling?
- Has the gable wall been insulated?
- Have all hatched been insulated as specified in PAS2030?:]