

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:

[Extra Energy]

Completed By:

[Pete Finlay]

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 with the proposed approach.]

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 agree with the proposed approach.]

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.

[We agree with the proposed approach.]

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.

[Extra Energy is already targeting to achieve 100% technical monitoring of all our measures. We consider SWI as high risk measure in terms of quality of installation and consumer protection in case of measure failure. Therefore, we are already targeting to achieve 100% pre-install desktop audit, 5% mid-installation TM and 100% post-install TM. We welcome the mandatory minimum mid and post-install targets proposed by Ofgem. We would recommend similar standard for RIRI, as lately the industry has witnessed several issues with the quality as well as percentage of measure installed.]

The consultation document does not mention what actions will be taken in case of failure to achieve this.]

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.

[We agree with proposed ranges. We are also doing 100% pre-install TM for virgin loft insulation measures. This has proven to be very useful in eliminating fraudulent activities. Ofgem had discussed about introducing similar range for pre-install TM requirement for virgin loft insulation. Based on our experiences so far, we welcome this proposal.]

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.

[Under the current practice the best practice questions do not contribute towards a measure failure.]

However, we consider them to be very useful in ensuring higher quality of installation. Therefore, we have made it mandatory for our TM Agents to cover the best practice questions during their inspections. We are a new entrant in ECO and have not submitted any TM reports so far. But we intend to report on these questions in our TM report submissions. We will continue using these questions irrespective of the outcome of this consultation.]

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.

[Question 2 requires more clarifications from Ofgem in case of properties heated by two or more fuel types. Our response to question 3 is about verifying property type as indicated in the consultation document. We believe that Ofgem should publish a clear definition of 'bedroom' for ECO purpose. Any ambiguity will lead to confusion and error in scoring as well as TM. The term 'reasonable reflection' in question 5 and 6 are open to interpretation. This should be removed or clearly defined.]

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.

[The existing score monitoring questionnaire asks about whether the measure is installed in a new built/extension. Will Ofgem continue with this question or is there a policy shift where ECO measures can be installed in new builds/extensions?

Would the TM Agent need to verify the reason for installing less than 100% measure while of site?]

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.

[We are not clear about how the TM Agent would verify the CWI product installed during his/her assessment on site. This is more complex especially because the purpose of this question is to verify thermal conductivity of the product. The TM can only verify this through an intrusive survey, which is certainly not a preferred option. The only other alternative we can think of is to rely on the installer's declaration of the product installed. Any further clarification on how the TM Agent should verify the product will be useful. Otherwise, we suggest to remove this question.]

Residual loft in roof rooms should be considered a part of flat ceiling, and should be mandatory to insulate. It should be insulated as part of roof room and not as a separate measure. The TM should verify if all parts of roof room are insulated and whether the aggregate of all matches with the percentage of measure installed claimed by the installer. This will require a thorough understanding of roof rooms by the TM Agent, which can be gained via a DEA accreditation.

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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.

[SWI measures should have specific score monitoring questions. Wall construction type and age of property has impact on the measure type selected plus the score assigned to that measure. Similarly, thickness of insulation installed should also be collected by the TM Agent for verification.]

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

If not, please tell us why you believe DEA accreditation or similar qualifications should be necessary.

[Though using only limited parameters, the deemed scores are still based on RdSAP. Therefore, in our opinion it still makes a case for TM Agents to have DEA accreditation. The scoring questions for heating measures and questions on percentage of measure installed and percentage of property treated specifically require understanding of wall construction as well as measurement techniques. Identifying primary heating source may also require specific knowledge of RdSAP rules and heating systems in some complex cases. Therefore, it is important for a TM Agent to be a DEA as well. Overall, we think that TMAs can effectively do score monitoring and identify and scoring errors if they have RdSAP accreditation.]

We also do not believe that there is a dearth of TM Agents with DEA accreditation, as we have never faced this difficulty despite being a new entrant or while trying to achieve 100% technical monitoring.]

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.

[DHS.1 should mention the minimum insulation thickness mandatory to meet the pre-condition, for example, loft should be insulated up to minimum 100mm.]

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.

[The injection holes pattern is most likely to be invisible in case of PWI due to the wall being decorated again.]

We suggest that instead of checking whether the heat pump/ biomass boiler provides 'working space heating' questions 4,6 and 8 should verify whether the heat pump/biomass boiler is the 'main source of heating' the premises? This will ensure that the system are correctly sized and functioning to meet the heating requirements of the property, and it's not just a secondary source.

Sometimes heat pumps and biomass boilers are installed only for heating. They may not cater hot water demand of the property. Would that be consider as a TM fail is the Agent selects 'No' in response to questions 5,7 and 9 above? We suggest there should be a third option of 'Not Applicable' for these questions.]

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.

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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.

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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.

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