

# 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](mailto:eco.consultation@ofgem.gov.uk) by 11 October 2016.

## 1. Respondent Details

Organisation Name:

[GCS Chartered Surveyors]

Completed By:

[Tom Foulerton]

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?

[            ]

**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?

[            ]

## 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.

[            ]

## 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.

[We feel that this is an unnecessary complication that adds no real value. Currently, inspections for these measure types are divided approximately equally between C2 and C3. This seems to work well and, in our experience, has produced a good representative sample of the measures at both mid and post install stage. We accept that Ofgem have not strictly monitored the percentage split but our clients have been operating within the spirit of the guidance to achieve as close to 50:50 as possible. Introducing upper and lower limits and the associated analysis required to monitor them will require significant work for little apparent benefit. ]

**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 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.

[Question 4: We believe that there will need to be flexibility permitted around the interpretation of any question concerning the number of bedrooms. The way residents use certain rooms in homes, and indeed change their use, is open to interpretation by 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.

Question 6: We don't understand how the 'percentage of property treated' differs from the preceding Question 5 'percentage of measure installed'.]

**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.

[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 insulation inspectors. Even then, it is difficult to determine whether it is failed pattern using one system or the correct one for another.]

**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 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 TM / SM agents. We believe that this should be a combination of experience and proof of technical knowledge, perhaps tested. Ultimately, we hope that this will be vested in the Assessment of Competency being developed by ATMA, but until this time it may be useful to retain the DEA qualification as a minimum standard. ]

## 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.

[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 it is very difficult for TMAs to properly assess whether the various elements of a RIR have been properly insulated. This applies particularly to the sloped ceiling sections. It is simply not possible for a TMA to assess whether this has been insulated: evidence of the ends of PIR boards sticking out between the rafters cannot adequately confirm that the insulation boards have been fitted throughout. The strong likelihood, given that rafters rarely run true or without obstacles, is that they have not. ]

**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.

[Although it is difficult to assess to what extent the various components of a RIR have been insulated at post-installation stage, it is equally impossible to answer the current mid-inspection question set when the installer is only part way through a job. For instance, how can a TMA confirm whether the sloped sections have been insulated if the technicians haven't started that element yet? We believe that there are drawbacks with the questions at both mid and post-installation stage, but on balance concur that they are more relevant at post installation stage. However, we do believe that an additional question (or questions) around the type and application of the insulation material itself should be added (see below)]

## 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 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 remove any of the existing technical monitoring questions?

☐ Yes

☒ No

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

[            ]

**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.

[CWI: Specific questions should be introduced for the TM of CWI to test for the presence of a suitable DPC and also to specifically assess elevations for any evidence of damp.

RIRI: Is the type and application of the insulation suitable for the proposed measure? As TMAs we are seeing the wrong forms of insulation (e.g. loft roll) being used for RIRI.

UFI: Is the type and application of the insulation suitable for the proposed measure? ]