

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:

[Polypearl Limited]

Completed By:

[Ian Tebb]

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 that the trigger points should be consistent, however if deemed scores are adopted then the scope for error is far less and you may even want to consider reducing the failure level in this respect to 5%]

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?

[Given that deemed scores are likely to be adopted and therefore the scope for error is far less we believe that anything over 10% should be treated as of "high concern" and taking this approach will ensure that installers do not get complacent and rely on less stringent compliance. This then simplifies failures into a single pathway giving more clarity and stricter control.]

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.

[As previously stated we believe that with deemed scores the scope for error has been reduced and the adoption of a single pathway provides clarity and stricter control therefore any additional assurances should be triggered once failure rates have exceeded 10%]

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 agree that SWI, FRI UFI, and also Party wall Insulation, all require mid-installation inspection although the 50% level will be quite onerous. In addition we believe it would also be appropriate to include mid-installation inspections for cavity wall insulation where the installed density of the material is controlled on site, rather than in the factory production of the material, for example, when using mineral fibre it is proposed that two different deemed scores can be used, and to distinguish which score is correct it will be necessary to verify the installed density. This can only be done on site, during installation, and without this check it is very much open to abuse by the installer.]

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.

[REDACTED]

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.

[Questions 5 and 6 seem to be asking for confirmation of the same thing so perhaps one of these can be eliminated]

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.

[Where a measure has more than one set of deemed scores, dependant upon the product type, then it would be essential to include a question that confirms that the score claimed was consistent with the product type actually installed. Therefore when checking cavity wall insulation scoring for mineral fibre products, verification of the actual density at which the product has been installed will be required in order to determine the correct score has been claimed]

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, in respect of cavity wall insulation, the proposed wording of the question is insufficient, for example where mineral fibre has been installed, the installed density would need to be verified in order to determine that the correct deemed score has been claimed, this is because of the recent proposed changes to deemed scores for cavity wall insulation, whereby mineral fibre products that are allegedly installed at a higher density (25kg) qualify for a different (higher) score, when compared to other mineral fibre products from the same manufacturer that are installed at a lower density.]

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.

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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.

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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.

[We do not agree that technical monitoring of party wall insulation should be focused on the drilling pattern, the important issue is whether the correct amount of material has been installed and that it is evenly spread to a consistent and correct density, this is particularly relevant when the lance system is employed.]

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.

[Question CWI.5 should read have " has insulation material been injected into all injection holes and in a manner consistent with the appropriate materials compliance certificate"]

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.

[In terms of cavity wall insulation it is vitally important the compliance checks can establish that the correct amount of insulation material has been installed. However we do not believe this can

realistically be determined by technical monitoring, particularly when there are no visual checks done above ground level, we would therefore propose that you consider a series of audits undertaken at both Installer's and system designer's premises to check the material usage over a given period, matches the number and volume of claims made. This audit check should be made against the target density of the system used, as determined in the appropriate materials compliance certificate. We would be happy to explain further how this type of audit can be conducted. However a good on site indicator would be how much time was spent carrying out the work, so in addition to a materials audit we would propose the following additional question should asked : " How long was the installer working on site?"

We also think there should be an additional question in respect party wall insulation which should read " has installation of party wall insulation compromised any existing cavity wall insulation present in the property, by way of disturbing the existing cwi material in any way, or any barrier (cavity brush) previously installed, used to separate properties, to stop material ingress in adjoining properties and minimise material loss into party walls?"]