

Ofgem Consultation 2.2 Response – Sustain Ltd

Question 1

- a) Do you agree with our proposed requirements for pre-existing roof insulation? Please provide reasons for your answer.

We think the level of existing loft insulation is likely to be higher than a U-Value of 0.4, therefore if it is assumed that there is an existing U-value of 0.4 or lower then no further insulation will be installed, meaning that properties that are actually greater than u-value of 0.4 do not receive the benefit of any further insulation. We propose that the actual loft level is measured to ensure accurate measurements.

b) Do you have any further comments or suggestions relating to this policy area?

Question 2:

- a) Do you agree with our proposal that a wall with a section of cavity narrower than 40mm cannot be insulated? Please provide reasons for your answer.

Agree, not technically possible to do with a guarantee.

- b) Do you agree with our proposal that a wall which adjoins a wall which cannot be insulated also 'cannot be insulated'? Please provide reasons for your answer.

Agree, not technically possible to do with a guarantee

- c) Are there any other scenarios where a cavity wall cannot be insulated? Please provide reasons for your answer.

Rubble filled cavities cannot be insulated, without extensive pre works

- d) For compliance purposes, how can suppliers demonstrate that a cavity wall cannot be insulated?

e) Do you have any further comments or suggestions relating to this policy area?

Question 3:

- a) Do you agree with our preferred approach (Option 1) for calculating the lifetime for multi-fuel DHS upgrades? Please provide reasons for your answer.

- b) If you do not agree with Option 1, do you agree with any of the other proposed options for calculating the lifetime for multi-fuel upgrades? If not, can you propose an alternative approach for calculating the lifetime for multi-fuel DHS upgrades?

c) Do you have any further comments or suggestions relating to this policy area?

Question 4:

- a) Do you agree with our proposed definition of a 'broken down' ESH? Please give reasons for your answer.

b) Do you agree with our proposal for judging that an ESH cannot be economically repaired? Please give reasons for your answer.

c) Do you agree with the thresholds given in the ESH Economic Repair Cost Comparison Table? Please give reasons for your answer.

We would like clarification as to how the ESH Economic Repair Costs have been calculated and we understand from feedback from the market that meeting these costs may be unachievable?

d) Do you have any further comments or suggestions relating to this policy area?

We would agree with Ofgem's view that there should be checklist for ESH.

We can foresee a situation regarding submissions that are viewed as a double claim where individual ESH are replaced in the same property. There needs to be clarification as to how scoring should be calculated when not all ESH are replaced at the same time?

Question 5:

a) Do you agree that 'boiler and system sludge' and 'unstable firing' alone are insufficient reasons for a boiler to be replaced? Are there any other faults which on their own are insufficient reasons for a boiler to be replaced? Please give reasons for your answers.

b) Do you agree that 'no boiler ignition' and 'unstable firing' should be considered separately? Please give reasons for your answers.

c) Do you agree that the boiler fault list is suitable to identify faults with non-gas fuelled boilers? Please give reasons for your answers.

d) Do you have any further comments or suggestions relating to this policy area?

Question 6:

a) Do you think the proposed changes to our requirements will be effective in reducing false claims of virgin loft insulation? Please provide reasons for your answer in relation to each change.

We agree that access to the loft should be sought before the measure is installed, this should be evidenced by the assessor. We do not agree that a declaration from the homeowner or tenant will prevent fraud, often they are not aware of the level of insulation or take what the installer says as being accurate. Therefore the installer/assessor could mislead them.

A pre and mid inspection is not feasible, there is limited time of the installation taking place, the cost of having an assessor available to do these inspections would push the cost up considerably.

Recent evidence suggest there are a few as 1% uninsulated loft with no insulation. We have evidence to suggest this number is far greater as under previously obligation mechanisms using deemed scored these properties very not cost effective high insulation cost verse low carbon savings. By not allowing virgin lofts these properties may miss out on insulation measures.

b) Do you see any difficulties in implementing these changes? Please provide reasons for your answer.

c) Do you have any suggestions for other controls or requirements we could introduce to reduce or prevent such false claims? Please provide reasons for your answer.

We think scoring differences between virgin and loft tops ups should be reviewed in order to bring them more in line with each other to reduce the potential to misrepresenting the existing loft insulation level.

d) Where existing insulation is removed because it is posing health and safety risks and new insulation installed, should the measure be claimed as virgin or top-up loft insulation? Can you provide examples of health and safety risks that would require insulation to be removed and how a supplier could demonstrate these risks?

One reason for removal could be insulation consisting of hazardous materials. Controls should be put in place to ensure evidence is provided to demonstrate removal under a health and safety view and then the loft should be considered virgin. As if this is not the case it may not be cost effective to do the installation.

Question 7: (NB: Please see Appendix 1 before answering any of the below questions)

a) Do you agree it is more appropriate to assess quality of installation and the accuracy of scores separately?

b) Do you agree with the proposed reactive monitoring process described in paragraphs 1.45 to 1.56 of Appendix 1? Do you think the monitoring rates are appropriate?

c) Do you agree that technical monitoring agents should have certain qualifications as explained in paragraph 1.15 of Appendix 1? Can you suggest which qualifications are most appropriate for different categories of measure?

We agree that the minimum qualification for technical monitoring quality agents should be DEA/GDA. There is a huge focus on technical monitoring and currently this is an unregulated area of ECO. Best practice should be shared across the industry to increase standards and keep costs down.

d) Are the qualifications listed in paragraph 1.16 of Appendix 1 appropriate for score monitoring agents? Are there any other qualifications that you would suggest?

e) Do you agree with the proposed timescales for remedial works and re-scoring to be conducted outlined in paragraphs 1.58 and 1.59 of Appendix 1?

f) Do you have any further comments or suggestions relating to this policy area?

We would support a view to direct further monitoring to those installers who are failing rather than further monitoring being requested of installers as a whole. By not viewing installers individually then compliant installers could be penalised.