



CAN National Response to the DECC Consultation on the Future of the Energy Company Obligation

The Carbon Action Network (CAN) is a not-for-profit organisation which exists to support our local government officer members who have a remit for reducing all aspects of the UK's domestic-sector carbon footprint and tackling fuel poverty.

This consultation response reflects the views of the CAN Executive Group, which is made up of the Chairs and Vice Chairs of CAN's ten regional bodies of England and Wales who, in turn, represent the views of their regional CAN members, expressed at their regional forum meetings and elsewhere.

NB: Although CAN is currently sponsored by E.ON at a national level, the views expressed below have not been influenced by E.ON and it is a condition of sponsorship that CAN remains autonomous in its views.

Question 1 Do you agree that the 2015 CERO target should be reduced by 33 per cent from 20.9mtCO₂ to 14mtCO₂?

CAN National does not support a reduction in the CERO target to 25,000 (cut from 80,000 in December 2013). This seems to go against the Government stated intention to see the solid wall industry grow. While understanding the Government realises that, due to the high cost, without subsidising the scheme, a lot of retro-fit solid wall insulation (SWI) would rarely meet the 'golden rule' of the Green Deal, it was hoped that by subsidising this type of work, the insulation market would grow, allowing for economies of scale to be introduced thereby bringing down the overall installation costs. We are reaching a point where cavity wall insulation retrofitting is decreasing due to the sheer volume of installations. Now is the time to go for the next challenge, and help the thousand who are finding it hard to heat their homes. Or has the government abandoned this and fuel poor households as well? We feel that CERO needs to be more targeted TO HELP the fuel poor as, at present, it is not being used to assist the most fuel poor in our society. So many vulnerable households are slipping through the net. We are also aware that some companies have achieved their targets whilst others are far behind. We think more should be done to oblige all companies to perform equally and in a consistent manner instead of the current CERO being a post code lottery.

Question 2 Should the new 2015 CERO target be applied to Phases 1, 2 and 3, or to Phase 3 only? Please provide justification for your answer.

We feel that the changes should only be applied to phase 3 as it is unfair to apply new rules retrospectively. If the rules were applied retrospectively then this would create even more confusion and it would have serious repercussions on many vulnerable households.

Question 3 *Do you agree that underachievement against the CERO target at 31 March 2015 should be able to be carried forward at a penalty rate of 1.1 times the amount of the shortfall?*

We think that penalties are a good way forward but 1.1 is too lenient. We feel that there should be more, stricter penalties that are applied promptly and publically. Previous penalty systems have not worked as well and current discussions with Ofgem proved that any penalties are indeed difficult to impose. A larger and more probable penalty should be imposed.

Question 4 *Do you agree that CSCO and Affordable Warmth targets should remain unchanged for 2015?*

Whilst it is promising that the targets are not being reduced we feel that the targets need to be more focussed on the fuel poor. The targets should place greater emphasis on getting properties to RdSAP B levels in all sectors.

Question 5 *Do you agree that all excess activity under CERO, CSCO and Affordable Warmth should be compliant with rules put in place for these sub obligations from 1 April 2015?*

Yes but with a greater focus on the fuel poor.

Question 6 *Do you have a view on whether, and what proportion, of over-delivery against 2015 CERO, CSCO and Affordable Warmth targets should be permitted to count towards 2017 targets?*

Yes over delivery should be counted but the Government needs to be mindful of what delivery is happening and whether there will be a threat of no delivery at the end of the programme as the Obligated have over delivered early on the programme. The government needs to note that CERO, CSCO and Affordable Warmth are not enough to eradicate fuel poverty from our societies and there does need to be an adequate scheme (such as Warm Front) which will be able to help the vulnerable. We also feel that the government needs to keep a close eye on the types of measures being delivered and over delivered on.

Question 7 *Do you have views on how such a cap mechanism should be calculated and then implemented? Do you have a view on how such a cap could work alongside the proposed SWI minimum threshold, and whether there are distinct implications for any of the three ECO sub obligations?*

We strongly feel that there should be no cap mechanism calculated. This will only leave more and more households vulnerable and in fuel poverty. The UK has a large number of SW properties and the autumn statement has already seen many of the Obligated Companies pull back on SW schemes. The government needs to do more to get these SW properties, especially those in the private rented and rural communities up to a RDSAP B rating.

Question 8 *Do you have views on whether the rules relating to transfer of activity can be improved or simplified?*

We do not have any views on this area however we feel that any changes should be transparent and be aimed at benefitting the vulnerable in our society. The government should also scrutinise any transfer of activity and only allow it in exceptional circumstances. The obligations set out by Government should in all fairness be met by each of the obligated companies.

Question 9 Do you agree that the ECO scheme should be extended from March 31 2015 to March 31 2017?

We feel that it is good to extend the scheme but the extended period should be more focussed on the real fuel poor and should be protected from interim changes such as the recent autumn statement which has seen many schemes be scrapped just before contract signing.

Question 10 Do you have a view on the modelling approach taken to set the 2017 targets, and are there other approaches that Government should consider? If so, please provide justification for your answer.

We feel that the targets should be increased with a focus on the fuel poor. The Government could perhaps consider prioritising the most severe, supporting priority households with cost effective interventions and ensuring that vulnerability is reflected in fuel poor policies.

The targets to 2030 should be aiming to get all properties up to RDSAP B rating to prevent homes having one measure, being taken out of fuel poverty then falling back into fuel poverty with rising costs etc. There needs to be a whole house approach to get properties up to RDSAP B.

We appreciate that it is not going to be possible to get every property up to RDSAP B therefore we suggest interim targets such as targeting households in properties that are Band D and E as the majority of the fuel poor are in these properties.

Any targets set should have clear ownership and set out how they will be monitored as well.

Question 11 Do you agree that the 2017 CERO target should be set at 12.4MtCO₂?

We do not agree with this target. We feel that setting a target based on carbon alone is not sufficient. The Government needs to do more by having interim targets and focussed targets in terms of fuel poor households.

We understand that for the obligated companies to be monitored there is a requirement for a target in carbon saved but carbon cannot be an exact synonym for fuel poor. The government needs to be bold and set targets or at least some sub targets around fuel poverty.

We feel there is confusion around the CERO. The SWI cashback seems to suggest that the Government does not need CERO.

Question 12 Do you agree that the 2017 CSCO target should be set at 6MtCO₂?

We think that DECC should get rid of CSCO. The take up has not been there. We have identified some properties in a CSCO area but they have not qualified for measures because the actual post code is in a different area.

Question 13 Do you agree that the 2017 Affordable Warmth target should be set at £3.8 billion of lifetime notional bill savings?

Considering many jobs are being cherry picked there is clearly a demand for Affordable Warmth. In addition to this there needs to be some sort of overall bill reduction target as well. £50 off the bill is not enough. We therefore think that yes the target should be increased.

Question 14 Do you agree therefore that work carried out to fulfil obligations under ECO should be additional to work funded under the incentive package? If yes, do you have suggestions on how this additionality could be ensured?

Yes we agree that should be the case in principle. However the way that contractors are awarded work will mean that either it will be impossible to administer (with contractors or householders paying the price by being penalised for double claiming) or that the incentive package will compete with ECO.

The best way to avoid this is to limit the eligibility criteria or share carbon savings. For example the proposed £90m for public sector will not interfere with the ECO programme as public buildings are not eligible for ECO. When the element of the incentive package aimed at Private landlords is available then removing private rented properties from the ECO scheme would avoid that competition/double counting. This has the additional benefit of dealing with some of the complex issues linked to incentives (who pays and who benefits) in the private rented sector.

This is more difficult in the new homeowner market where householders will want to exercise choice in the options from ECO, the proposed incentive scheme, local offers and Green Deal. Rather than the schemes competing, or a huge administrative exercise to avoid double counting, maybe they are best designed to complement each other but with the carbon savings split between the schemes based on a pro rata contribution or a deemed share.

Question 15 Do you agree that all forms of cavity wall insulation, including standard “easy to treat” cavities installed from April 2014, should be eligible as a primary measure under CERO?

No we do not agree with this. Able to pay should have a standard reduced fee to pay to incentivise them but not use up all the funds available. This money should then be used to support the vulnerable households though reinvestment in certain schemes.

HTT CWI has begun to take off and this sector needs support. There are a phenomenal amount of HTT CW in the country. We feel that this measure should have an increased target under CERO. Not all HTT C have been done in all areas.

Question 16 Do you agree that loft insulation which is installed from April 2014 should be eligible as a primary measure under CERO?

No, this will come at a price. The Government expressed an interest that householders should buy their own LI as it was cost effective. This is why this measure was removed from the original ECO. If you want the able to pay market to buy CWI and LI we suggest that a minimum charge be levied at

householders (for example £50 in 2014, £75 2015 and £100 2016 and £125 2017). These funds must be paid by the householder not the utility or contractor. The money could then be recycled to pay for Affordable Warmth work that fails to deliver cost effective savings for the utilities but the need still exists for residents to save energy (particularly prevalent in Rural areas).

Question 17 Do you think it would be appropriate to make provision to ensure that low income and vulnerable households benefit from the delivery of loft and easy to treat cavity wall insulation under the 2017 CERO target? Please provide views on any appropriate mechanism by which to do this.

Under the current schemes we are seeing that the vulnerable are often missing out. This is either because it is harder to engage with them, they are harder to provide measures to and the obligated companies can often cherry pick jobs. Able to pay should pay, even a nominal charge to allow maximum resources to be directed at the vulnerable.

We also feel that the Government needs to do more to make the obligated work with the real vulnerable households especially in the rural areas. No one is willing to work with the remote households who are the real households in need.

Any money generated from the able to pay should be reinvested to subsidise the extra costs associated with these extreme properties to make sure that they are not being missed off by contractors.

Question 18 Do you agree that heat networks (district heating schemes) should also become eligible primary measures under CERO from 1 April 2014?

We think this is a step in the right direction providing that there is directed support at the fuel poor and vulnerable households. Due to the nature of these projects they will require long-term investment and support which needs to be secured from the obligated companies by the government.

Question 19 Do you agree with the proposal to extend the number of eligible areas under CSCO from the lowest 15 per cent of areas, as identified using the Index of Multiple Deprivation, to the to the lowest 25 per cent of areas for measures delivered from 1 April 2014?

Extending areas is not the solution. Just because a household is in a CSCO area does not mean that it will also be a fuel poor or vulnerable household. There needs to be greater targeting of individual households. This can be done by working closer with local authorities who know the areas and households in need of assistance. This post code lottery should be removed; even the 15% rule is not working.

Question 20 Do you agree with the proposal to change the criteria for measures installed under the CSCO rural sub target so that, measures delivered from 1 April 2014 can count towards the sub target if they are installed at any domestic property located in the poorest 25 per cent of rural areas, as well as to households living in rural areas that are in the Affordable Warmth Group.

The removal of the requirement for the CSCO rural sub-target to qualify under AWG will make this target more achievable. Increasing the catchment area could make this more open to helping the less needy as rural areas can hold affluence alongside deprivation.

Question 21 *Do you agree that an uplift should apply to the notional lifetime bill savings of non-gas fuelled households? Please provide views on the form and level of the uplifts as suggested above.*

Yes we agree with this because the cost of measures in non-gas fuelled households is considerably higher. The carbon saving factor should not be the only criteria to consider, cost, overall impact on quality of life etc should be considered as well.

Question 22 *Are there other practical and effective means of incentivising delivery to non-gas fuelled households? In particular we are interested in views on a minimum level of delivery and changing the baseline heating technology for the replacement of “qualifying boilers”.*

A minimum level would be preferable to any other method so that Carbon savings are not artificially inflated.

Question 23 *Do you agree that broken or not functioning efficiently electric storage heaters should be scored on the same basis as that used for “qualifying boilers”? Do you foresee any unintended consequences of this approach?*

Yes, in order to allow equality, but maybe government should impose certain restrictions on the privately rented sector properties such as landlords not being able to increase rent to tenants or not being able to evict them for a set period (unless there are genuine reasons to do so). We are worried about private landlords taking advantage of this in an unfair way.

Question 24 *Do you have any views to why packages of measures may not be being delivered to Affordable Warmth households?*

- 1) Lack of communication to the real vulnerable households – local authorities are the best way to do this. Sometimes vulnerable clients may not engage with the contractors.
- 2) Contractors cherry picking jobs based on most carbon savings, therefore avoiding the genuinely vulnerable households.
- 3) Contractors only looking for what they can offer e.g. a heating installer may not take much interest in insulation.
- 4) Lack of communication between health, hospital discharge, contractors etc. If local authorities are involved then we can help ensure that the most vulnerable do not fall through the net.

Question 25 *Do you have any views on whether incentivising or, where applicable, requiring packages of measures is justified? Do you think there would be any unintended consequences from such a change to the policy and if so, what would they be?*

We should be looking at thermal comfort levels under decent homes for the affordable warmth households. Some things need to be obligated e.g. having a boiler should automatically include TRVs on the radiators. We have had instances where a boiler installation has not taken place because no one will fund the TRVs yet they are required by the building regulations.

Question 26 *Do you agree that there should be a SWI minimum figure equivalent to 100,000 properties insulated with SWI by 31 March 2017? Should this be set as number of properties, or as a carbon equivalent? If the former do you have any views on how this should be set? If the latter, do you have suggestions as to how the target should be calculated?*

This should certainly be linked to number of properties, otherwise a few very large properties could benefit, also we should encourage the minima to be raised to 200,000 so that SWI is still an option. In the last year of CESP we understand circa 120,000 SWI jobs were delivered, so reducing the requirement so far would have significant impacts on the industry. We note that up to 2013 over 25,000 SWI jobs had already been done under ECO so we expect the work rate to drop even further given this change.

Question 27 *Do you agree that we should specify SWI lifetimes in legislation for installations accompanied with an appropriate guarantee, and do you have any views on what the specified lifetime should be?*

Yes this is an important guarantee and will assure some level of quality. We think that 25 years should be a set lifetime. Otherwise an occupier may need works to be done and redone a number of times in their lifetime.

Question 28 *Do you have a view on whether lifetime for other measures should also be set in legislation, and if, which measures?*

No opinion

Question 29 *Do you agree that the SWI minimum threshold should be apportioned according to market share, and if so, should this be calculated on a phased basis? And if so, what principles should apply?*

Providing the apportionment is fair and is a minimum.

Question 30 *Do you agree that secondary measures installed alongside SWI should not be counted towards the proposed SWI minimum threshold? What are the practical implications of this proposal, for instance, brokerage trading?*

Yes, we agree that secondary measures should not be counted.

Question 31 *Were we to take legislative action, what would be your preferred option based on those set out above? Do you agree that scoring uplifts is likely to be the optimum approach?*

Scoring uplifts would be preferable but we have concerns about using ECO to make GD work artificially. Whilst some aspects of ECO have been successful, Green Deal has failed in its ambitions and a thorough examination of its failures is needed before we try to rescue it and bring ECO into further failure as a result.

Question 32 *What are your views on a scoring uplift for blended finance and could you provide evidence for your view?*

We believe GD could work but tweaking ECO is not the way. The Government should consider how the GD package is delivered and review that first, it is important to know why GD has failed before you mess with ECO.

Question 33 Please provide views on whether, and if so, the extent to which Affordable Warmth measures should be part funded by customer contributions and other types of finance.

Affordable Warmth should be and needs to be targeted at the most vulnerable. Therefore we oppose any charging, top up, client contribution for these customers. These customers are usually struggling with basic living costs therefore any costs associated with measures may be a deterrent to customers benefiting from the schemes.

There was a similar issue under Warm Front where clients were being asked for extra top up money and there was no fund to cover these. Local authorities had to task themselves to assist these vulnerable clients. This should not happen again as budgets are already very tight for local authorities.

Extra funds should be set up either the Government of the obligated companies.

Question 34 Do you believe there is a case to limit customer contributions under Affordable Warmth?

Yes. We believe there should be no customer contributions for the vulnerable. If customers will be required to make contributions there should be clearly signposted funds which customers should be assisted to access. There should be a quick process so that jobs are not cancelled or parked by the obligated companies.

Question 35 Do you agree with the above "levelisation" proposals for recognising and rewarding early progress, and do they sufficiently address any adverse competitive implications of the other proposed changes to CERO?

No opinion.

Question 36 Do you agree that the uplift threshold should be set at 35 per cent (primary measures only) of Phase 1 and 2 of the current CERO obligation?

No opinion.

Question 37 Do you agree that an uplift of 1.75 should be applied to primary measures above the proposed 35 per cent threshold installed by the end of March 2014?

No opinion.

Question 38 Do you agree that Government should consider adopting a different approach to the delivery of SWI as part of the levelisation exercise? Should delivery of SWI above the 'expected delivery profile' for individual suppliers at 31 March 2014 be permitted to count towards the 35 per cent levelisation threshold?

No opinion.

Question 39 Do you agree we should amend the legislation to allow the optimum carry forward of excess action from CERT and CESP?

We would prefer those that failed to meet targets buy from those that over achieved as originally envisaged. For those that have over achieved they should be encouraged and a small reward would be considered acceptable but as CERO is being significantly reduced this will lead to unmet demand.

Question 40 In amending the legislation (as set out above) should we allow the process for notifying and approving excess actions to rerun in its entirety?

No opinion.

Question 41 Do you agree we should change the rules, as set out above, to:

- **Align the notification arrangements for Adjoining Installations with the arrangements for Qualifying Actions.**
- **Introduce greater clarity on the rules on the re-election and re-elections after transfer of Qualifying Actions, to ensure flexibility and aligning the rules on Excess Actions with these changes.**
- **Extending the final date for transfers by one month to align with the final notification date for work completed under ECO.**

No opinion.

Question 42 Are there any further technical changes we could make to the rules on Qualifying and Excess Actions which would add flexibility, but without undermining the scheme objectives?

No opinion.

Question 43 Can you provide evidence for a need to strengthen consumer protections under ECO? If so, what do you suggest are the best options for strengthening consumer protection?

Quality installers should be employed from the outset. There needs to be clear transparency between the company, the installer and the client so the client knows who to contact in case of any problems. Often the subcontracting is so far down the line that the subcontractor is only implementing part of the assurances from the obligated company. There needs to be a clear charter /code of standard that every client should expect.

The customer should know who to contact and what remedy/answer to expect within a set time. It should be simple and nationwide to prevent another post code lottery.

Persistent offenders should be named and shamed.

Question 44 Do you agree that boiler replacements should require a warranty to cover parts and labour, which should not be invalidated by incorrect installation/commissioning, and that it should provide for the actual repair/replacement rather than compensation?

Yes, we believe given the target audience that it should not be just the boilers that are covered but the whole heating system. It is clear most HHCRO work is focused on replacement boilers only and no thought given to the heating system. We would request that any warranty should include free

servicing of the boilers and heating system. The client group involved often struggles to fund basic servicing so this would reduce gas leaks and save CO2. Also consider the earlier points about TRVs.

Question 45 Do you have views on what minimum period such a warranty should cover?

Ideally this would be seven years as many boiler manufacturers can offer this already. However, recognising that a balance between costs has to be achieved we would suggest at least 5 years. This would ensure that guarantees keep boilers going into the next supplier obligation at least.

Question 46 What are your views on how we should reflect the more stand-alone nature of electric storage heaters within this proposal?

We would welcome any alterations that encourage the use of ECO to increase activity in this area, but we would like to see a wide range of solutions employed not just like for like replacements with marginal improvements in efficiency.

Question 47 Do you believe that there are grounds for concern around the quality or nature of Affordable Warmth installations? If so, how should concerns be addressed?

Yes the delivery to the public is very chaotic and this allows poor installers to operate successfully in this area. We would welcome a sample of physical inspections from the regulator and targets adjusted down where poor quality is not resolved by the obligated party.

Question 48 Do you believe that additional safeguards are required to ensure the quality of installations under Affordable Warmth, and if so, in what form?

See Q47.

Question 49 Do you believe the current means of checking the requirements of eligibility for a “qualifying boiler” are appropriate? Do you have any suggestions on how this could be improved?

There is a focus on the scheme for boilers. Whilst this is a key part of the heating system, it is not the only part. We would like to see the systems adjusted to reflect an adequate heating system not just a focus on boilers.

Question 50 Do you think any changes to the definition or guidance on what constitutes a “qualifying boiler”, for both repair and replacement, are necessary? If so, what changes would be suitable?

We don't have enough information available to us to make a suitable comment on this area. We are aware that there are some questionable practices but as we don't have full access to the regimes it is difficult to comment.

Question 51 What evidence can you provide on the reasons for limited levels of boiler repairs rather than replacements?

We do not have enough access to information to offer much advice. We know from experience in dealing with the industry that repairs are offer lower profit margins, require greater skills to fix boilers, parts can be difficult to get hold of and can result in repeat visits. Hence it is often easier to recommend a boiler replacement and this is often received positively by the householder.

Question 52 *Do you have a view on whether measures funded through ECO from April 2015 should be recommended on the basis of a GDAR? In which case, do you have a view on whether Chartered Surveyors Reports should only be used to recommend measures in exceptional circumstances only? And if so, what should constitute an 'exceptional circumstance'?*

We think EPCs are sufficient and the additional burden of GDAR (whilst quite modest) is unnecessary. A Chartered Surveyor's report works quite well in situations where there are multiple households sharing a building. There will always be situations where an energy assessment makes or fails to make a suitable recommendation and Chartered surveyor can apply a professional overview (however we think there are many experienced energy professional who could do this but there is a lack of qualification standard to independently determine who these individuals are).

Question 53 *Do you have other views on improving accuracy of assessments, for example the use of lodged EPCs?*

From a HECA/data perspective having all energy assessments as lodged EPCs would be advantageous but it does add to the cost of delivery we suspect a cheaper method could be found. Also the purpose of EPC's is to reduce energy consumption not to provide adequate heating and the additional GDAR requirements are they to more accurately predict savings. If you are fuel poor reducing your costs is less obvious given you may not be spending the funds required to adequately heat your home so energy improvements may actually yield very low savings but those savings are significant to the householder. There is a danger that a reliance on these figures will help those with the smallest Fuel Poverty Gap and dismiss those with the greatest fuel poverty gap as uneconomical to assist. The RdSAP should also be free to Affordable warmth

Question 54 *Where GDAR's are a paid for service when recommending Affordable Warmth measures, we welcome views on where any cost would likely - or indeed – should sit.*

Given that the Government is recommending this increased standard, and that it does not necessarily take account of the increased comfort that householders may require (see Q53), we would suggest the Government fund it to avoid costs being spent on administration rather than householders.

Question 55 *Do you have a view on whether measures promoted under ECO from April 2015 should be delivered by an accredited Green Deal installer and/or an installer who is PAS2030 certified?*

We have not seen that the standards of installation increase because of these quality marks. It also makes it harder for smaller firms to access such markets and provides another level of bureaucracy to cost for. A review of which standards are needed and whether they should be altered would be welcomed. Elements of PAS2030 worry more about upkeep on vehicles used to convey trades people than the actual installations.

Question 56 *Do have a view on whether there is value in a demand aggregation service for the carbon elements of the ECO obligation? If so, is ESAS the most appropriate provider of this service?*

ESAS has been poor in providing advice and/or referrals to local schemes and has hence hindered street-by-street rollout and confused the market. Having the marketing impact of the Government has certainly helped it achieve many referrals and its access to DWP records is useful for reducing administrative burden. But the links to local schemes and integration of ECO fund, Green Deal and other funds is not possible as the scheme is inflexible and still refuses to refer to local providers.

Question 57 Please provide views on the current administrative cost of checking Affordable Warmth Group eligibility and any other actions taken to meet Affordable Warmth Group audit requirements.

This is an area which causes lots of householder concern as lead generators collect lots of personal data in order to fulfil Ofgem requirements (they also collect lots of additional back up information just in case). In cases where homeowners then miss out on ECO funding they are worried about the personal data they have had to release and whether unscrupulous individuals have collected it in order to commit identity fraud. A simplification process is welcomed and it could equally reduce Ofgem's administrative burden.

Question 58 Do you agree that DECC should safeguard the continued existence of the ESAS referrals service for Affordable Warmth? If so, how?

See answer to question 56.

Question 59 Please provide views on whether there are wider developments and improvements to the ESAS Affordable Warmth referrals service which DECC should consider.

Please refer to response to Q56 and Q58. As regards to improvements we would welcome, ESAS could undertake the checks with DWP but then release a unique reference number that the client can then offer to any contractor, not just the one referred to by ESAS and this would Ofgem its required audit process also. This would still require contractors/ECO obligated parties to determine property ownership but not benefit entitlement which can often be very protracted.

We are also concerned by the fact that where members of our network have called on behalf of clients they have refused liaise with us and will only speak to clients direct. Where we are acting as advocates this excludes those individuals who are usually the most vulnerable from accessing some services.

We would request that DECC consider reverting to the old EEAC service (Energy Efficiency Advice Centre), which was superior to the ESTAC model and was able to integrate local schemes with national programmes.

Question 60 In light of the proposed changes to ECO, can you provide new evidence that may warrant a change in the current Government's position on mandating brokerage? Do you believe a case now exists for regulating participation on the brokerage platform, for example, by requiring energy companies to deliver a proportion of their ECO obligation through the platform? Are there other options available to Government to ensure our objectives for a competitive energy efficiency market can be met?

As the brokerage system is limited in access we do not have enough information to make a full comment. We would however express concern about the reputed prices being paid through

brokerage recently and the ability to deliver at the price to an acceptable standard. Whilst competition has obviously been good at reducing costs we have justifiable cause for alarm that contractors can install AW boilers for £800-900. Which corners are being cut? How much are householders being asked to contribute?

Question 61 Do you have views on the accounting treatment of the obligation?

No opinion.

Question 62 Government invites views on what elements of the ECO scheme rules would benefit from simplification, and if so, how this can most effectively be done while still ensuring that the scheme objectives are met and the schemes integrity maintained?

We would welcome developments on access to the service that DWP provide ESAS so that Benefit entitlement compliance can be settled without photocopying letters. This seems an outdated method. Also similar data is available from Landmark on property ownership.

The treatment of those in the AWG and those in deprived areas needs to be considered from their stance not just from a carbon saving or targets perspective. Having made the solution to fuel poverty a market the scheme will fail as the most vulnerable and invariably the most uneconomical to resolve, please consider a safety net for those householders who are eligible for support but considered difficult (whether that is backboiler replacements in the AWG or Private stock in between housing association stock in CSCO areas). We have proposed the development of a fund paid for by householders in the able to pay market. Local authorities would be happy to discuss this with the Government.

Question 63 Government invites views on whether there are improvements that could be made to the ECO scheme on a longer term basis to ensure the scheme can best meet its objectives. We welcome evidence justifying the case for change.

Stability is key to delivery and we would welcome a settled scheme as soon as possible.