

National Energy Action (NEA) response to the Department for Business, Energy & Industrial Strategy (BEIS)'s consultation on the Energy Company Obligation (ECO 3) 2018 – 2022



Action for Warm Homes

Background to this response

Living in cold, damp and unhealthy homes continues to cause shocking levels of unnecessary hardship and premature mortality. At least 9,700 people die each year due to a cold home, the same as the number of people who die from breast or prostate cancer¹. As well as the devastating impacts cold homes have on their occupant's lives, this problem extends to all of us; needless health & social care costs², queues at GPs and A&E as well as delaying the discharge of the most vulnerable patients from hospital³. The recent severe weather underlined the urgency in helping those suffering in fuel poverty. Recent news articles include:

- ❖ *UK weather: Big freeze death toll could rise above 2,000 as it emerges Met Office warned ministers a month ago* (The Telegraph)
- ❖ *England sees funding fall for energy-efficient homes* (BBC news)
- ❖ *Fuel poverty crisis: 3,000 Britons dying each year because they can't heat their homes, study shows* (The Independent)
- ❖ *Charity issues warning over cold weather deaths as 'Polar Vortex' hits UK* (Evening Standard)
- ❖ *A record number of deaths related to the cold in the UK are classified as 'AVOIDABLE'* (The Express)
- ❖ *People left without heating due to spending cuts, says fuel poverty group* (The Guardian)

About NEA

NEA⁴ work across England, Wales and Northern Ireland to ensure that everyone in the UK⁵ can afford to live in a warm, dry home. To achieve this we aim to improve access to energy and debt advice, provide training, support energy efficiency policies, local projects and co-ordinate other related services which can help change lives. Our subsidy Warm Zones is a not-for-profit Community Interest Company that also aims to work in partnership in various locations across the country to deliver integrated packages of energy efficiency measures, benefits and energy advice⁶. This practical insight is crucial to the authenticity and insight within NEA's advocacy. NEA also provide the secretariat for the All-Party Parliamentary Fuel Poverty & Energy Efficiency Group to raise awareness of the problem of fuel poverty and the policies needed to eradicate it⁷.

Summary of this response

Within the consultation the UK Government rightly note it is unacceptable that people living on a low income should do so in properties that cannot be kept warm at reasonable cost⁸. Currently over 4 million UK households are unable to keep themselves or their families warm and well. The levy funded Energy Company Obligation (ECO) is currently the only remaining domestic energy efficiency delivery mechanism in England. It also plays a key role in

reducing fuel poverty levels across the rest of Great Britain. Whilst there are clear and well-articulated limitations to relying solely on this mechanism to meet the UK Government's legal commitments⁹ or support fuel poverty eradication targets elsewhere in GB, we welcome the opportunity to contribute to the development of the ECO 3 policy. Our response aims to improve accessibility to the programme and simplify the 'offer' ECO provides to the people it is there to serve. We also highlight the key links ECO has to wider policy areas and the need for greater ambition beyond this market-based policy.

NEA continues to highlight the limitations of relying solely on ECO

In Wales and Scotland, ECO is supported by other key national energy efficiency schemes¹⁰. As noted above, ECO is the only remaining domestic energy efficiency delivery mechanism in England. Given the notional 'spend envelope' of £640m per annum is defrayed across the whole of GB – it is clear this policy alone will not provide the required investment necessary to meet statutory fuel poverty targets or the near-term milestones in England¹¹. The limited GB resources ECO can deploy have been clear for many years^{12 13}. As a result, since 2010, NEA has championed the need for the limited funding that does remain to be targeted at those most in need - households in or most extreme risk of fuel poverty. In addition to NEA's own repeated calls, this has also been a key recommendation of the Committee on Fuel Poverty¹⁴ and Climate Change Committee for many years¹⁵. Following the Fuel Poverty Strategy for England in 2015¹⁶, previous¹⁷ and current Ministers assurances¹⁸ (and a delay due to the current 18-month ECO transition period¹⁹); NEA now hopes the UK Government will meet their welcome commitment to ensure the entirety of ECO is targeted on those in or at most risk of fuel poverty, without further delay. Despite these previous reassurance, disappointingly, NEA estimates that based on the proposed policy option, only c.10,580 fuel poor households in the worst Energy Performance Certificate (EPC) F & G bands will be supported by 2020²⁰. This is inclusive of those supported in the Private Rented Sector (PRS)²¹. In England, this could leave an estimated 240,000 fuel poor households in F & G rated homes long after the first 2020 milestone has been missed and therefore, based on the proposals within the consultation, it is clear additional policies to ECO will be needed to meet the UK Government's commitments.

Understanding the impact ECO 3 has on fuel poverty is a priority

The recent Clean Growth Strategy rightly notes the UK nations have different definitions of fuel poverty²² and as well as the UK Government's commitments in England, the other nations also still have statutory fuel poverty eradication targets based on the 10% indicator²³. As a result, the Clean Growth Strategy commits to assessing the impacts the individual policies outlined in the Strategy²⁴ could have on fuel poverty as part of its implementation. This commitment has yet to be honoured within the ECO consultation and it is crucial this analysis is undertaken. NEA also notes the failure to assess the impact of the ECO was a key criticism of the Public Accounts Committee²⁵ and National Audit Office's report into the shortcomings of the current scheme²⁶.

The preferred policy option must be adjusted

NEA urges BEIS to urgently reform the preferred policy option which aims to increase the size of the eligible Affordable Warmth pool to 6.5 million households. As noted in the impact assessment, this preferred policy option was chosen despite it having the least impact for those households in fuel poverty and the lowest Net Present Value (NPV)²⁷. As a result, NEA stresses the need for the Government to clarify that the widening of the eligibility criteria by including Ministry of Defence administered benefits, Disability Living Allowance (DLA) and/or Personal Independence Payments (PiP) will be subject to a suitable income cap. In a similar fashion to the treatment of Child Benefit, it is currently assumed this should be subject to a suitable equivalised income threshold²⁸. The Government must also provide this assurance and further details of how this cap will operate prior to the new Regulations being laid in Parliament²⁹. As well as the disappointing impact the proposed policy will have for the poorest households³⁰ in the worst EPC bands, NEA notes that the promising steps to reintroduce a rural safeguard and provide greater role for local authorities within the proposed scheme via ECO flexibility³¹ could be undermined by the extent of the widening of the AW eligibility criteria.

Improve accessibility and simplify the 'offer' ECO provides

Given the stated aim to target low income, fuel poor and vulnerable households; NEA believes it is paramount to improve the accessibility and simplify the 'offer' ECO provides to the people the policy should be there to serve. Given the Government's assumption that there will be no household contributions made during the course of the policy³², NEA calls for there to be an explicit prohibition of financial contributions that are often required to take part in the ECO scheme. If the Government fail to provide this assurance, as a minimum, any requirement to make household contributions must be capped and monitored rigorously. NEA highlights this was another key observation of the National Audit Office (NAO)'s 2016 investigation into the Green Deal and ECO³³. NEA also seeks for the Government (and Ofgem) to stipulate the need for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations³⁴. We highlight how this can be achieved; by communicating the support that is available through ECO in more consistent and assessable formats³⁵, provide adequate advice³⁶ to maximise the benefits of the energy saving measuring being installed and ensure any contractors highlight how other forms of supplier-led assistance can be accessed if the most vulnerable fail to benefit from energy saving measures under the scheme³⁷. In addition, customers that benefit from ECO must be made aware how they can seek redress where the installation fails to deliver the anticipated or promised outcomes. Without adding unreasonable additional costs, NEA believes these steps would radically improve the customer journey for low income and should be set out in a Code of Practice or included as part of the proposed accreditation of the Quality Mark³⁸. As a minimum, the need for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations must be reflected within the final ECO Guidance.

Gaps in support within ECO must be addressed urgently

NEA highlights that the most acute gaps in provision for fuel poor households are for those living in hard to treat, solid wall homes and for those without functioning central heating. In England alone, there are over 1.1 million fuel poor homes with solid walls. Based on the generous assumptions that all proposed 17,000 hard-to-treat interventions per year deliver solid wall insulation (as opposed to other combinations of insulation measures) in fuel poor homes in England; it would take over 18 years to deliver this support to the current fuel poor population in support of the statutory fuel poverty targets or the near-term milestones.

In addition, whilst welcoming the intent of the Government's proposal to increase the current cap on boilers and support the exemptions for non-efficient boilers that are installed alongside insulation, as well as the provision of incentives to carry out heating repairs, NEA warns the proposals are still insufficient. For example, our own analysis suggests the yearly broken boiler cap could have been delivered three times over, by one supplier, in the recent cold snap³⁹. NEA also highlights an end to support for heating oil boilers could leave 140,000 of the poorest households in the deepest fuel poverty, left without any way of heating their homes. NEA stresses that these reforms can only take place if low income households can access other policies that can provide suitable alternative forms of heating (like the Renewable Heat Incentive⁴⁰) or new bespoke policies.

NEA also stresses that the changes to the scoring for first time central heating (FTCH), including renewable and district heating, is likely to over incentivise delivery in social housing at a time when the Gas Distribution Networks (GDNs) are rightly being challenged to improve targeting of the *Fuel Poor* Network Extension Scheme (FPNES) scheme⁴¹. NEA's report last year, "In from the Cold"⁴² underlined the value of FTCH as a key measure to address fuel poverty⁴³. The report also noted a much more precise method to deliver this support to the right households, would be to introduce a FTCH sub-target. This would operate like the current ECO solid wall minimum and deliver cost-effective heating measures and fuel switching to low income off-gas households historically ignored under ECO. NEA estimates this could generate lifetime bill savings of up to £0.9bn in over 63,000 properties over the course of the future obligation (2018-2022). The report also noted eligibility for these measures should be restricted to private tenure low income and fuel poor households, where the largest funding gaps exist.

Role of innovation within ECO must not distract from its core aim

The consultation aims to provide energy suppliers with routes and/or incentives to test and trial new innovations with ECO. Within NEA's response last year to the National Infrastructure Commission (NIC) Technology Study call for evidence, NEA highlighted which new technologies may have the greatest potential. NEA's brief response drew on our own Technical Innovation Fund which specifically aimed to facilitate community-level trials of innovative technologies not traditionally within the scope of current retrofit or energy saving programmes⁴⁴. Whilst this work demonstrates the potential for innovative approaches to have direct benefits to low income and vulnerable people, given the limitations of ECO, NEA believes the policy could fail to provide the advice, support and controls that are necessary to de-risk innovation projects on behalf of the recipients. Nor does NEA believe the ECO policy should be used as a way of defraying the cost of manufactures own R & D budgets. NEA consequently supports the lower end scale for the size of any innovation ring-fence and highlights the need for future innovation projects under ECO to directly demonstrate tangible outcomes for low income customers. We therefore support the innovation scores uplift route proposed in the consultation (or to be more accurate, deflators to current incumbent scores) as this will have fewer risks and will be a better way of stimulating innovation given the wider constraints we note elsewhere in the response⁴⁵.

ECO must be supported by more stringent obligations on landlords

The consultation overall highlights the limited support ECO⁴⁶ is likely to make to improving conditions in the PRS, specifically to help meet the minimum energy performance standards which came into force from April this year or in general⁴⁷. The programme also suggests a number of ways social landlords should be able to better access the programme. NEA believes social landlords already have clear obligations to improve these homes and independent of ECO, have a long track record of improving this tenure⁴⁸. The UK Government also now recognise meeting the PRS minimum standards must be achieved via direct landlord investment. NEA therefore recently welcomed and supports the removing of the current 'no upfront cost' caveat to the existing regulations. Despite welcoming this proposed simplification, given the limitations within ECO, landlords must however be required to pay up to £5,000 per property to meet these basic energy efficiency standards. Given the clear absence of support via ECO, a lower cap will mean less than half of F and G rated privately rented homes in England and Wales could be assisted by 2020, containing over 50,000 children left in the deepest fuel poverty and in unacceptable housing conditions. Over and above ECO, NEA believes other complimentary actions⁴⁹ are also needed to improve the PRS and the social rented sector. This will require closer co-operation with the Ministry of Housing, Communities & Local Government⁵⁰ and HM Treasury.

Further resources beyond ECO must be found

Finally, NEA stresses to the UK Government the central importance of domestic energy efficiency remaining the most enduring solution to achieve collective goals; ending fuel poverty, delivering a successful industrial strategy⁵¹, supporting small business growth in every region, helping to achieve carbon emissions reductions⁵², improving local air quality⁵³, reducing health & social care costs⁵⁴ whilst providing real benefits to households who are struggling financially⁵⁵. NEA has noted the limitation and opportunities of developing the ECO policy. NEA hopes that alongside ECO, the Government are considering using public infrastructure capital to co-fund area-based energy efficiency schemes to systematically improve the quality of UK housing in every part of the country. In this context, NEA has warmly welcomed the publication of the National Infrastructure Commission's (NIC) interim National Infrastructure Assessment (NIA). The interim NIA rightly identifies the need to urgently address the energy wastage in UK homes and states dramatically enhancing energy efficiency must be a key national infrastructure priority. NEA is also an active member of the Energy Efficiency Infrastructure Group who strongly support this approach and have set how this can be achieved⁵⁶. This approach is also currently supported by a growing number of Non-Departmental Public Bodies, academics, industry and NGOs⁵⁷. There is also strong cross-party consensus highlighting why ending cold homes and reducing needless emissions via improving domestic energy efficiency must be a priority; no other form of investment can deliver so much.

Key recommendations made in this response

Obligation targets and supplier thresholds

- I. NEA urges BEIS to urgently review the impact the final policy option will have on the delivery of the near-term milestones in England. The Clean Growth Strategy's commitment to review the impact on fuel poverty eradication targets elsewhere in GB based on the 10% indicator should also be honoured.
- II. Whilst NEA does not contest the level of the provisional notional lifetime bill savings target, the Government should be explicit that it must be met independent of any household contributions. If the Government fail to provide this assurance, as a minimum, any requirement to make household contributions must be capped and monitored rigorously. NEA also suggests the obligation be split into 2 equal phases, rather than the four phases currently proposed.
- III. NEA believes the supplier thresholds for ECO should be set at 50,000 customers with the suggested taper operating from this lower threshold. We also highlight the ability of these smaller companies to buy-out of their obligation. If this can be achieved, this could provide a valuable hardship fund which should be delivered in similar way to Industry Initiatives under Warm Home Discount, Redress funding or the Northern Ireland Sustainable Energy Programme (NISEP)⁵⁸.
- IV. NEA only supports the ability of obligated suppliers to carry forward delivery from ECOT into ECO 3 delivery of Affordable Warmth (AW) not CERO (albeit we suggest how some flexibility could be allowed). NEA also does not support carry under of the obligation and questions how relevant this proposal will be given the relative ease by which suppliers should have met their ECOT targets.

Household eligibility and proposed ring-fences

- I. NEA urges BEIS to urgently reform the preferred policy option which aims to increase the size of the eligible Affordable Warmth pool to 6.5 million households before the final regulations are tabled in Parliament.
- II. The new eligibility criteria including Ministry of Defence administered benefits, Disability Living Allowance (DLA) and/or Personal Independence Payments (PiP) must be subject to a suitable income cap.
- III. Alongside efforts to better target this assistance, NEA supports the greater role for local authorities within the proposed scheme via ECO flexibility. We also support this being set at 25% of the obligation.

- IV. NEA supports the reintroduction of a rural safeguard and setting this at 15% of the obligation. The Government should examine how a high proportion of the hard to treat/solid wall minima can be delivered within this sub-target.

Eligible energy efficiency measures

- I. 17,000 hard-to-treat homes improved per year is too low to support the statutory fuel poverty targets or the near-term milestones and this sub-target should be increased.
- II. NEA welcomes the intent to increase the current cap on boilers and support the exemptions for non-efficient boilers that are installed alongside insulation as well as the provision of incentives to carry out heating repairs; NEA warns the proposals are still insufficient and should be expanded.
- III. NEA does not support an end to support for heating oil boilers if these low income households continue to be unable to access other policies that can provide suitable alternative forms of heating (like the Renewable Heat Incentive⁵⁹) or new bespoke policies are not introduced urgently.
- IV. The changes to the scoring for first time central heating (FTCH) should only apply in private households and lifetime bill savings of up to £0.9bn should be ring-fenced for the delivery of FTCH up until (2018-2022). Again, these measures should be restricted to private tenure low income and fuel poor households, where the largest funding gaps exist.

Innovation

- I. NEA welcomes the potential for innovative approaches to have direct benefits for low income and vulnerable people. However, given the limitations of ECO, we support the lower end scale for the size of any innovation ring-fence.
- II. NEA supports the innovation scores uplift route proposed in the consultation (or to be more accurate, deflators to current incumbent scores) as this will have fewer risks and will be a better way of stimulating innovation.
- III. NEA believes in-situ performance actions could also have some benefit in incentivising packages of energy saving measures, but stresses that funding outside of ECO must cover the costs of monitoring equipment and manufacturers must provide a clear set of remedial actions and compensation, should their products fail to deliver the anticipated outcomes for households.
- IV. NEA believes Ofgem need to ensure there is full transparency on which technologies and manufacturers products are being tested at any one time. This information should be kept up to date and be in the public domain. In addition, third parties must be able to challenge/contest any reported findings.
- V. Ofgem should formally consult on any changes to deemed scores (or in the case of a deflator, a decision is made to alter the deemed score of an existing product). These consultations should also be linked to the phases for the ECO3 to provide some predictability of the timing of these revisions.
- VI. Key learning from NIA trials, tax funded research and ECO innovation must also be brought together so research gaps can be identified and addressed.

Customer journey, quality and standards

- I. As above, NEA calls for there to be an explicit prohibition of financial contributions that are often required to take part in the ECO scheme. If the Government fail to provide this assurance, as a minimum, any requirement to make household contributions must be capped and monitored rigorously.
- II. The Government (and Ofgem) need to stipulate for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations⁶⁰.
- III. NEA believes steps to improve the customer journey for low income should be set out in a Code of Practice or included as part of the accreditation of the quality mark. As a minimum, the enhanced needs of those in vulnerable situations must be reflected within the final ECO Guidance.

Links to wider policy and ambition beyond ECO

- I. Given the clear absence of support via ECO in the PRS, private landlords must be required to pay up to £5,000 per property to meet basic energy efficiency standards.
- II. NEA highlights other complimentary actions⁶¹ are also needed to improve the PRS and social housing sectors and this will require closer co-operation with the Ministry of Housing, Communities & Local Government and HM Treasury.
- III. The RHI must be reformed to provide far greater access to alternative heating technologies. This is now a major policy priority which must be addressed prior to ECO going live in September.
- IV. Alongside ECO, the Government should use public infrastructure capital to co-fund area-based energy efficiency schemes to systematically improve the quality of UK housing in every part of the country.

Response to the consultation questions

Chapter 1: Obligation targets and supplier thresholds

1. Do you agree with the current supplier obligation threshold?

No. We would like to see all suppliers that are over 50,000 customers being required to take part in the scheme.

2. Do you agree that we should amend the taper mechanism to a supplier allowance approach?

Yes but it should be applied to all suppliers that are over 50,000 customers that should be required to take part in the scheme.

3. Do you agree with our proposed obligation phases for the future scheme?

We are concerned about that the impact the four proposed obligation periods will have on delivery. This could create unnecessary policy uncertainty. NEA would suggest the obligation be split into 2 equal phases; phase 1 which would run for 18 months (Sept 2018 - 31st March 2020) and phase 2 (1st Apr 2020 – 31st March 2022). In addition, whilst NEA agrees that the individual obligation targets should be adjusted for incumbent suppliers to adjust for new obligated parties, the Government should be explicit that the overall notional lifetime bill savings target cannot be revised downwards. Other policy adjustments should also be able to be accommodated at the mid-way point.

4. Do you agree that an unlimited amount of Affordable Warmth delivery (from 1st April 2017) and up to 20% CERO delivery should be allowed to be carried over to the future scheme (with the exception of oil and coal heating systems)?

NEA supports the ability of obligated suppliers to carry forward delivery from ECOT into ECO 3 delivery of Affordable Warmth (AW). NEA does not support the ability of obligated suppliers to carry forward delivery from ECOT into ECO 3 of any Carbon Emission Reduction Obligation (CERO). The only exception to this is where a supplier can demonstrate that the delivery of CERO being carried over supports the delivery of heating measures in private tenures under AW. If the current proposal to allow carry forward of CERO goes ahead, this could result in significantly less support being delivered to AW recipients from September 2018 unless the overall targets are increased by up to 20%.

5. Is carry-under necessary and do you agree with our planned approach?

NEA does not support carry under of the obligation and questions how relevant this proposal will be given the relative ease by which suppliers should have met their ECOT targets.

6. Do you agree with our planned approach to early delivery during a potential gap between schemes?

Given the negative impact the delay caused by the current 18 month ECO transition period has already had on fuel poor households⁶² (and the constrained consultation period was justified on the basis it would allow the ECO 3 scheme to start as planned), NEA believes it is incumbent on the Government to ensure the regulations are in place to allow the ECO 3 scheme to begin on time and without further delay. If the Government is unable to guarantee this outcome, the proposal to ensure early delivery of ECO 3 is not subject to the generous uplifts ECO2t deemed scores is essential.

Chapter 2: Obligation targets and household eligibility

7. Do you agree with the proposal to increase the Affordable Warmth obligation so that it represents 100% of the future scheme?

Yes, NEA supports the increase the Affordable Warmth obligation so that it represents 100% of the future scheme. As noted in the summary section, since 2010, NEA has championed the need for ECO to be far better targeted on those in or most extreme risk of fuel poverty to reduce the impact. In addition to NEA's own repeated calls to better target limited ECO levy funding, this has also been a key recommendation of the Committee on Fuel Poverty and Climate Change Committee for many years.

The latter made this recommendation while giving its advice to the UK Government on how to meet the carbon budgets whilst mitigating the impact on fuel poverty, it is essential this now occurs. NEA also notes the long delays to securing this outcome; following the Fuel Poverty Strategy for England in 2015, previous and current Ministers assurances (and a delay due to the current 18 month ECO transition period), NEA hopes the UK Government will now finally meet their commitment to ensure the entirety of ECO supports low income households.

8. Do you agree with our proposal to include a rural sub-obligation representing 15% of the total obligation?

Yes, NEA supports the reintroduction of the rural safeguard. We also suggest that the Government must try and encourage delivery of the sub-target for hard to treat/solid wall properties within this group. This in part will help compensate these households for successive years of under delivery.

9. Do you agree with the proposal to include the disability benefits noted in Table 2 above within the eligibility criteria for private tenure households under ECO3?

No, this preferred policy option was chosen despite it having the least impact for those households in fuel poverty and the lowest Net Present Value (NPV) and NEA stresses the urgent need for the Government to clarify that the widening of the eligibility criteria by including Ministry of Defence administered benefits, Disability Living Allowance (DLA) and/or Personal Independence Payments (PiP) will be subject to a suitable income cap. In a similar fashion to the treatment of Child Benefit, it is currently assumed this should be subject to a suitable equivalised income threshold and claimants would be made aware of the entitlement to support following a DWP income check. Whilst NEA acknowledges this would impact the consumer journey, a taper could be used to smooth the levels of support provided, with those households closest to the income threshold (i.e those with the highest incomes) able to access measures that provide less support than those in the greatest need.

NEA also highlights that the income threshold should be set in proportion to the income deciles most likely to be in or at most extreme risk of fuel poverty (income deciles 1-2). Net disposable income after housing costs of a low income household is £248 per week (£12,933 per year), equating to 60% of the UK median of £413 per week. The income after housing costs of a fuel poor household is even lower: £10,118 per year, equating to a net disposable weekly income of £194. Investigating income deciles shows the poorest 10% of UK society have a gross average weekly household income of £130 (£6,760 per year). Fuel poor households overwhelmingly comprise the poorest fifth of society: 85% of households in fuel poverty in England are located in the first and second income deciles and 78% of English households in those two deciles are fuel poor. The Government should provide this assurance and further details prior to the new Regulations being laid in Parliament.

10. Do you agree that Child Benefit subject to an equivalised income threshold should be included within the ECO3 eligibility criteria for private tenure households?

Yes, NEA would only support this policy subject to an equivalised income threshold. Again, NEA also highlights that the income threshold should be set in proportion to the income deciles most likely to be in or at most extreme risk of fuel poverty.

11. Do you agree with the proposal to remove the income thresholds under the future ECO scheme for households in receipt of Universal Credit and Tax Credits?

No. NEA does not support this proposal. Nor does it support the Government's benefits cap. The two areas of policy should not be conflated. NEA particularly notes the risk that the benefit cap could be reformed or removed altogether given it is politically unpopular and fails to recognise the reality of the needs of households containing more than two children. If the cap was removed, then the targeting of ECO would be badly affected. NEA also notes there is no question on whether the same eligibility for WHD can be used to deliver ECO. It is surprising the impact this could have has not been investigated or consulted upon.

12. Do you agree with the proposal that self-declaration is used for proving eligibility under the income threshold requirement attached to Child Benefit and for the benefits administered by Veterans UK?

No. The consultation provides no evidence on why this may be required and notes the risk of allowing some elements of the eligibility of the scheme to have a lesser burden of proof than other routes. If the Government requires further data sharing powers to allow DWP to undertake an electronic verification to introduce a suitable income threshold, these must be sought in the same manner as the existing powers and the new eligibility could be introduced at the mid-way point in the scheme. This position is equally true of the widening of eligibility to Disability Living Allowance (DLA) and/or Personal Independence Payments (PIP) which, as stated above, also must be subject to a suitable income cap.

13. Do you agree with the proposal to retain eligibility for social tenure housing only for those properties with an EPC Band rating of E, F or G?

Yes. Social housing properties are typically much more energy efficient compared to other tenures. This is very clear from the tables below which are taken from respective housing data from across all of GB.

All households across GB					
	Below Band C (000s)	Below Band E (000s)	Total	% below C	% below E
Owner-occupied	12,569	867	16,780	74.90%	5.20%
Private-rented	3,744	332	5,118	73.20%	6.50%
Social-rented	2,452	49	4,729	51.90%	1.00%
Total	18,765	1,249	26,627	70.50%	4.70%

Just low income across GB (below 50% of median)			
	Below Band C (000s)	Below Band E (000's)	Total
Owner-occupied	1,651	140	2,204
Private-rented	1,717	149	2,277
Social-rented	1,205	28	2,310
Total	4,573	318	6,791

Across Wales and England, the energy efficiency improvements in this tenure was largely due to the significant tax-paid investment via the Decent Homes programme which (in a very welcome way) has meant social housing is now considerably more energy efficient (when compared to other tenures). Therefore, this also means there are also fuel poor households in social housing. This is most evident in England where the LIHC definition applies. This isn't simply true of the headcount of fuel poor households but also the fuel poverty gap. This is lowest for the social rented sector (housing association and local authority), which are substantially below the average fuel poverty gap for England. The fuel poverty gap sits around the average for households in the owner-occupied sector; with the highest depth of fuel poverty seen for private rented households (£410).

In addition, whilst NEA acknowledges that social housing tenants are more likely on be living on a low income, their housing costs have not risen to such an extent. As a result, where ECO is now such limited resource given it has been reduced by half compared to what it was initially, we have had to make some hard choices about who should be prioritised with this assistance. In deciding these priorities, NEA stresses that we hope the gap this may create for social tenants can in part be offset by their social landlords who receive funding to maintain these properties. We have therefore been trying to also highlight the business case for social landlord investing in their own stock themselves to improve the capital value of the property. We have been involved in research which has found for example that energy efficiency improvements help to reduce rent arrears and void periods etc⁶³.

14. Please provide evidence on how the mapping tool described above could reduce the search costs of identifying eligible households, quantifying the cost reduction where possible

NEA has no evidence to cite in support of this proposal but does note and support the need to better target support provided via ECO at those households in or at most risk of fuel poverty. In this context, in 2016 NEA developed its own poverty assessment tool designed to help front-line home energy efficiency assessors and fuel poverty programme workers to calculate whether a resident is living in fuel poverty. Based on the information you input about the household circumstances and property details, it calculates the impact of different interventions on the level of fuel poverty to help assessors understand which could be the most cost-effective measures. The development of this tool was co-funded by NEA, Joseph Rowntree Foundation, Eaga Charitable Trust and Citizens Advice and is free to use.

NEA also stresses the importance of allowing a range of parties to be able to access the development of any new software or the underlying benefits data it may present. NEA recently noted that Section 36(3) of the Digital Economy Act should be further expanded to allow local authorities, public sector health bodies and energy network companies to undertake direct data matching process with the Department for Work and Pensions (DWP), independent of licensed gas and electricity suppliers. At present it is not possible for these key groups to do this without being subject to the enhanced General Data Protection Regulations or a time consuming appraisal of the household's circumstances and securing individual 'opt in' consent. Invariably, given the risk adverse nature and time constraints on these organisations this is currently judged by the vast majority as 'too difficult' or 'too time consuming'. Unless addressed, this will lead to a postcode lottery where some citizens' data can be shared to better identify and assist vulnerable households who are most at risk of the direct impacts of morbidity associated with cold homes while others can't be, even if it's for a similar or identical purpose. In specific reference to expanding current powers to energy network companies, the GB energy regulator Ofgem currently requires energy suppliers and Distribution Network Operators (DNOs) to identify customers who are of pensionable age, disabled or chronically sick and offer appropriate services, the GB-wide Priority Services Register (PSR). Whilst licence obligations may vary across energy supply businesses, electricity and gas network companies, the services which are available include:

- Bills and meter readings provided in Braille, large type or audio tape
- Moving a meter free of charge to make it easier to access
- Having controls or adaptors provided to make meters or appliances easier to use
- Free quarterly meter readings where householders are unable to read the meter themselves
- An annual safety check of the householder's gas appliances (unless a tenant, in which case this the landlord's obligation)
- Priority reconnection if supply is interrupted and advance notice of any interruption
- Alternative facilities for cooking, heating and medical equipment that is reliant on electricity if energy supply is interrupted
- A password protection scheme for energy suppliers contacting the household
- Arranging for bills to be sent or copied to a third party, such as a carer, who can help read and check for accuracy
- Free advice and information about the services available on grounds of age, disability or chronic illness.

Following a review of the PSR by Ofgem, eligibility has changed from a 'category' approach to a model based on 'need'. Energy suppliers, DNOs and potentially Gas Network Operators (GDNs) will be obligated under the new PSR to identify and help those in need. Allowing network companies to directly access information from central Government about the support energy suppliers can provide to eligible households in their area would help them identify some of the most vulnerable customers and deliver more bespoke solutions to them. This is particularly acute in the case of GDNs who will now be required to identify ECO eligible households and often have to disconnect gas supply at properties as the boiler is deemed to be unsafe. Our current research to date shows this removes one hazard with another (living with an unsafe gas appliance to having no access to essential heating, hot water etc). If this situation is not quickly resolved this can prompt multiple issues, particularly for more vulnerable residents unable to afford to replace the affected boiler/space heaters. Where the property is either privately rented or social housing, tenants could be required to notify their landlord that the gas leak or Carbon Monoxide (CO) risk has been identified by a gas engineer and it can be some time until the gas appliance is either repaired or replaced.

Despite being in rented accommodation, the onus can be placed on the tenant to see if they are eligible for support to national schemes and arrange these works (or in a limited number of instances even pay the costs). These instances are particularly the case when the landlord cannot be contacted or there may be a dispute over the nature of the works or the cost of ancillary repairs. If GDNs was able to determine eligibility for the ECO criteria more consistently and efficiently at the point of a disconnection, the aforementioned risks and delays could be reduced.

In making the case for these expanded powers (and implicit within our support for proposals within the consultation) NEA recognises that extending current data-sharing practices with energy companies (or to a lesser extent the other aforementioned groups) could be perceived by the public as contentious. Whilst NEA has highlighted the clear proportionate benefit of enabling energy suppliers, local authorities, health bodies or network companies to identify and deliver practical help to struggling energy consumers, it is critical that clear legislative safeguards are put in place. NEA therefore believes it is important that the enforcement, legislative controls and criminal penalties noted within this consultation ensure this sensitive information should only be used for the purpose of improving the well-being of the individuals whose data is being shared by central Government. It is essential for consumer confidence in the process that there are these appropriate protections of people's personal information. It is also critical energy companies are clear with consumers about how it is being used. We therefore hope, in addition to the legislative controls and criminal penalties, Ofgem will remain vigilant for any instances where companies might be using the data for anything other than the intended purpose.

15. Do you agree that, subject to supportive evidence being available, up to 25% of ECO can be delivered through flexible eligibility?

Yes. Whilst limited measures have been installed via this route to date, NEA fully supports the eligibility flexibility proposal and believes it can help open access to the scheme for fuel poor households that are not on means-tested benefits and encourage greater involvement of local actors, especially where vulnerability is a concern. NEA also believes the higher end proportion of 25% of the obligation should be met through this route. NEA also notes the reason why there has been such limited activity through this route is the wider flexibility suppliers have already got to deliver the AW support. In this context, NEA highlights a major concern that the further widening of AW proposed in this consultation will undermine the welcome proposal to increase the proportion of ECO delivered through LA flexible eligibility. If this can be addressed, NEA is committed to working in partnership with BEIS and LAs so that more declarations identify fuel poor households not in receipt of eligible benefits or low income households that are vulnerable to the effects of living in a cold home. If the LAs themselves don't use these powers and appoint another body with 'delegated responsibility' to refer households to an obligated supplier on their behalf, these organisations will also need to be encouraged to prioritise this assistance at those in or at most risk of fuel poverty.

NEA also continues to highlight one of the main reasons LAs may not be prioritising this mechanism is the significant risks that whilst low income and vulnerable households can be referred to support, they will not receive any assistance. Alternatively, some households can only take part if they provide variable contributions towards the cost of the works. This prohibits many LAs from having the confidence to utilise this mechanism, despite the potential benefits. As a result, in response to the section within the consultation on "Consumer experience and consumer contributions", NEA calls for there to be an explicit prohibition of financial contributions that are often required to take part in the ECO scheme. NEA also seeks for the Government (and Ofgem) to stipulate the need for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations. We highlight how this can be achieved and would stress that this would not necessarily lead to additional costs and would dramatically enhance the accessibility and simplify the 'offer' ECO provides to the people the policy should be there to serve.

Chapter 3: Eligible energy efficiency measures

16. Do you agree with our proposal to exclude the installation or repair of oil and coal fuelled heating systems?

No. NEA is very worried that over 140,000 of the poorest households, in the deepest fuel poverty, could be left without any way of heating their homes if their oil-fired heating breaks down. If the Government seeks to end support for heating oil boilers, it must be accompanied by enhancing access to other policies that can provide suitable alternative forms of heating (like the Renewable Heat Incentive⁶⁴). Out of the current RHI budget, we have been urging DECC and BEIS for some time to provide an annual ring-fence for fuel poor households off the gas network who cannot afford the upfront costs of renewable heat technologies. As with the better targeting of the ECO policy, this recommendation was made by the Climate Change Committee (CCC)⁶⁵ in their advice to the UK Government on how to meet carbon budgets and mitigate impacts on fuel poverty levels. In 2016, the UK Government also committed to targeting the RHI on fuel poor households but has so far failed to deliver on this pledge⁶⁶. This is despite NEA's recent research into heat decarbonisation and social equity noting our preferred policy approach would be far more cost-effective overall⁶⁷. In the words of the House of Lords Secondary Legislation Scrutiny Committee which examined the policy merits of the new secondary legislation "It is clear that the Department's commitment to reforming the RHI scheme needs to be rigorous and on-going if the deficiencies of the past are to be redressed".

NEA also believes our policy proposal would be a much more balanced and reliable way for these differing programmes (ECO and RHI) to directly support the attainment of the fuel poverty targets to improve the energy efficiency of fuel poor homes to band E by 2020 and the subsequent milestones and the final 2030 target. In addition, from 2018, it is hoped that ECO resources should be used to provide targeted insulation improvements to these households to ensure they have access to the RHI policy. The latter will be made even more feasible when enhanced data sharing is introduced which can reduce policy costs and help the most vulnerable households access this support. Without responding in this manner, the proposal in the consultation will leave a big gap in provision for low income or vulnerable consumers who cannot afford to repair or replace their heating system. Throughout last winter, NEA has highlighted that if a household faces financial barriers to repairing or replacing their faulty heating appliance, there is virtually no support provided nationally⁶⁸ and no repairs have been undertaken to gas boilers under ECO since April last year.

The prolonged loss of space heating in particular has the potential to detrimentally impact on a household's health and wellbeing, especially during the recent harsh winter and amongst occupants most vulnerable to living in a cold home. A broken or unsafe heating appliance is also likely to prompt the use of secondary heating appliances. Using electric portable heaters is recognised as one of the most expensive forms of heating⁶⁹. Alternatively, alongside poor ventilation, use of combustion room heaters such as LPG and solid fuel fires can significantly increase carbon monoxide (CO) exposure risk⁷⁰. Furthermore, older and unsafe boilers are less energy efficient⁷¹, increase carbon emissions⁷² and lead to heightened risks for nearby neighbours also as a result of CO poisoning⁷³ or potentially, in extreme situations, fires and explosions⁷⁴.

As well as trying to highlight the opportunity to reform the RHI policy, NEA has also been involved in some limited trials of innovative technologies that can help address these challenges⁷⁵. If the RHI is not reformed urgently, we hope that the learning from these trials work will be channelled into the development of a new bespoke programme. In this context, NEA will be making the case for a "Rural Challenge Fund" using some (or all) of the funding BEIS still makes available via the National Concessionary Fuel Scheme. Remarkably, given the stated policy intent noted for ceasing support for heating oil boiler repairs/replacements, this scheme still pays for former coal workers to receive a coal allowance every four or five weeks, depending on where they live. This funding, or alternatives, could therefore be spent supporting more innovative ways of reducing off-gas energy costs (not just heating) and address the wider challenges these households currently face.

17. Do you agree with the broadening of the criteria for the installation of FTCH?

NEA welcomes the intent to incentivise first time central heating (FTCH) with these changes. NEA's report last year, "In from the Cold"⁷⁶ underlined the value of FTCH as a key measure to address fuel poverty⁷⁷. However, NEA believes the changes to the scoring for FTCH should only apply in private households in order to reduce the chances that the proposal will over incentivise delivery in social housing. This would be perverse given Gas Distribution Networks (GDNs) are rightly being challenged to improve targeting of the *Fuel Poor* Network Extension Scheme (FPNES) scheme⁷⁸.

NEA is also concerned about the proposal to include renewable and district heating. If this policy option goes ahead, district heating projects need to be capped and the contribution that ECO plays towards the capital expenditure of a DH project should be limited to co-funding the heating exchanger unit, radiators and control inside the property, not subsidising the cost of installing the network itself. NEA also continues to note the importance of providing adequate warranties for alternative renewable heating systems and the need to enhance consumer protection for district heating projects. Our In from the Cold report also noted a much more precise method to deliver this support to the right households would be to introduce a FTCH sub-target. This would operate like the current ECO solid wall minimum and deliver cost-effective heating measures and fuel switching to low income off-gas households historically ignored under ECO. NEA estimates this could generate lifetime bill savings of up to £0.9bn in over 63,000 properties over the course of the future obligation (2018-2022). The report also noted eligibility for these measures should be restricted to private tenure low income and fuel poor households, where the largest funding gaps exist.

18. Do you agree with our proposed approach to limit the replacement of all broken heating systems to the equivalent of 35,000 per year, (excluding the installation of FTCH, renewable and district heating systems, inefficient heating upgrades delivered alongside insulation and heating controls) and our proposals for limiting certain heating repairs?

NEA supports the intent of the Government's proposal to increase the current cap on boilers and support the exemptions for non-efficient boilers that are installed alongside insulation as well as the provision of incentives to carry out heating repairs. NEA warns however that the proposals are overly complex and still insufficient. The cap should be further increased. British Gas, the largest obligated energy supplier, recently noted that they received over 136,000 boiler breakdown reports during the cold weather period. This suggests the yearly broken boiler cap could have been delivered three times over, by one supplier, in the recent cold snap.

19. Do you agree with our proposal to allow certain heating system upgrades where they are delivered alongside certain insulation measures?

Yes, however as noted above, the proposed process is overly complex and needs simplification but NEA supports this policy. It would also be expanded to include broken heating systems.

20. Do you agree with our proposal to include a requirement to treat a minimum number of solid walled homes? What technologies or combinations of technologies could cost effectively deliver the same bill saving outcomes as SWI?

Yes. NEA supports the intent to provide flexibility to deliver the same affordability outcomes, however NEA contests that solid wall insulation must continue to receive explicit support from ECO in order for the Government to meet its fuel poverty commitments. NEA therefore proposes increasing the requirement to treat a minimum number of solid walled homes whilst retaining a certain proportion to install SWI explicitly. NEA also supports these measures being delivered to rural households who have not benefited historically from supplier obligations.

21. Alternatively, do you believe that an SWI-only minimum should be continued?

Yes. As above, NEA proposes increasing the requirement to treat a minimum number of solid walled homes and retaining a proportion to install SWI.

22. Do you agree that the minimum is set at the right level (17,000 homes treated per annum)?

No. NEA is concerned by the limited size of the minima. Based on the generous assumptions that all proposed 17,000 hard-to-treat interventions per year deliver solid wall insulation (as opposed to other combinations of insulation measures) in fuel poor homes in England alone; it would take over 18 years to deliver this support to the current fuel poor population in support of the statutory fuel poverty targets or the near-term milestones. NEA proposes increasing the requirement to treat a minimum number of solid walled homes and retain a proportion to install SWI.

23. Do you think a 66% minimum requirement of eligible households should be introduced under Affordable Warmth for the Solid Wall Insulation and District Heating? Please suggest an alternative preferred percentage, and supporting evidence where applicable

No. NEA would urge BEIS not to further defray the obligation to able to pay households. This recommendation is made in the context of an acute concern with the Government's proposals to double the size of the AW eligible cohort.

24. Do you think the infill mechanism should be implemented using the same area based methodologies used for the current flexible eligibility in-fill mechanism? Please suggest an alternative preferred mechanism, and supporting evidence where applicable.

No. again we urge BEIS not to defray the obligation to able to pay households. As noted above, NEA also proposes a cap on the extent of district heating projects funded under ECO. Any funding for this measure should also be limited to co-funding the heating exchanger unit, radiators and control inside the property, not subsidising the cost of installing the network itself. NEA also stresses again the importance of providing adequate consumer protection for district heating customers.

25. Do you agree that all eligible and in-fill measures should be notified together and within six months after the first measure was completed?

NEA has chosen not responded to this question.

26. Do you agree that the proportion of homes in the same building, adjacent buildings or the same terrace that can receive solid wall insulation as 'in-fill' under ECO flexible eligibility should be limited to 50%?

No. NEA would urge BEIS not to further defray the obligation to able to pay households.

27. Do you agree that any measures which receive the RHI should not be eligible for ECO?

Yes. Whilst NEA welcomed the Government previously considering the interplay between the RHI and ECO to address the upfront capital barriers those less able to pay have in accessing renewable heating, NEA notes in response to question 16, ECO and RHI are separate policy instruments. We also noted in our previous response to the Help to Heat consultation a concern that this will over incentivise suppliers to install these measures. By introducing a new mechanism allowing only ECO obligated parties to benefit from RHI payments over seven years, we feared this would make this form of heat generation much more attractive to suppliers compared to the demand reduction measures (essentially cost neutral or profit making). This could also prohibit other, non-obligated suppliers of new entrants from developing 3rd party financing models on equal terms. In order to address this, NEA highlighted within the response to the RHI consultation, not to rely solely on market driven capitalisation models to provide equal access to low income off gas households. NEA argued that out of the current RHI budget BEIS could provide an annual ring-fence within the budget for fuel poor households off the gas network who cannot afford the upfront costs of renewable heat technologies (and potentially provide a small on-going operational subsidy to ensure these households are compensated for any increase in fuel costs or maintenance costs). As noted above, this would be far more cost effective and deliver this support quicker in support of the interim fuel poverty milestones (or in general). If these reforms are not in place by September this year, given the proposal to end support for oil boilers, an alternative bespoke policy should be introduced.

28. Do you agree with our approach for scoring ECO3 measures?

Due to the limitation in time to respond to this consultation, it has not been possible to undertake a full assessment of the implication of these proposed changes. However, based on the practical insight from our subsidiary WZs and the experience of our supporters, we believe the current approach creates market drivers to favour installations in larger detached properties. The current scoring mechanism is also still overly complex and effectively discriminates against fuel poor households in smaller properties. NEA does however agree with the removal of the uplifts for deemed scores currently used within ECO2t. NEA also welcomes the incentives for boiler repairs which have not been delivered at all since April last year, causing acute hardship for low income households who cannot afford to repair their heating systems. NEA also notes elsewhere in this response the need for any new uplifts due to the innovation project under ECO to be based on deflators to current incumbent scores. This will have fewer risks and will be a better way of stimulating innovation given the wider constraints we note elsewhere in the response⁷⁹. In addition, if the demonstration route does go ahead and its output is intended to be the production of a deemed score, third parties must be able to challenge/contest any reported findings. In general, this information or project reports should therefore be in the public domain or published alongside Ofgem's consultation on any changes to deemed scores (or in the case of a deflator, a decision is made to alter the deemed score of an existing product). These consultations should also be linked to the phases for the ECO3 to provide some predictability of the timing of these revisions.

Chapter 4: ECO in Scotland

NEA works alongside our sister charity Energy Action Scotland (EAS) to ensure we collectively have a UK wider reach. NEA therefore has not provided answers to these questions in so far as they may impact the operation of the delivery of the obligation in Scotland. Following the consultation, NEA will engage on this area to highlight any specific considerations or implications for Wales and England.

Chapter 5: Innovation

As noted in the introduction, NEA recently administered a Technology Innovation Fund (TIF). Overall over 44 projects were awarded funding (with an additional two programmes granted funding in 2017), involving 19 types of technology and 66 products. The grant recipients⁸⁰ agreed to work with NEA to ensure that appropriate monitoring and evaluation⁸¹ could take place. NEA also utilised its extensive experience to work with local partners in areas experiencing high levels of fuel poverty to ensure the impacts of the technologies themselves were amplified. Where possible, there was also a focus on low income households, 61% of the residents had incomes under £16,000. In addition, NEA targeted rural and off-gas communities and EPC band D, E, F and G properties and 24% were living off the mains gas network and reliant on more expensive heating fuels. Early analysis of the initial household surveys indicated the TIF programme brought about significant benefits with high levels of satisfaction reported across the programme. These impacts included:

- Keeping warm and comfortable at home - A large majority (78.2%) of households have experienced increased thermal comfort as a result of TIF interventions
- Energy bills and affordability - Almost three quarters (73%) of households thought the affordability of their energy bills had improved since receiving their measures, with over a third (35.5%) agreeing that it had improved a lot while a further (37.5%) thought it had improved a little
- Managing energy bills - While almost half of households (48%) thought their energy bills were manageable before they received measures, this increased to over half (62%) after installation of the TIF measures
- High levels of satisfaction with our programme - The majority (85.5%) of households were satisfied or very satisfied with the assistance they had received from the TIF programme overall

Whilst this work demonstrates the potential for innovative approaches to have direct benefits to low income and vulnerable people, given the limitations of ECO, NEA believes the policy could fail to provide the aforementioned advice, support and controls that are necessary to de-risk these projects on behalf of the recipients. Nor does NEA believe the ECO policy should be used as a way of defraying the cost of manufactures own R & D budgets. NEA consequently supports the lower end scale for the size of any innovation ring-fence and highlights the need for future innovation projects under ECO to directly demonstrate tangible outcomes for low income customers like those highlighted above. We therefore support the innovation scores uplift route proposed in the consultation (or to be more accurate, deflators to current incumbent scores) as this will have fewer risks and will be a better way of stimulating innovation given the wider constraints we note elsewhere in the response⁸².

As well as highlighting these issues, NEA also stresses the need for any on-going learning of the innovation route to be pooled alongside existing evidence from successful trials under the levy-funded Network Innovation Allowances (NIAs) or those that are tax funded through research councils and independent universities which are also investigating the potential for new energy technologies. In particular, NEA highlights the Energy Systems Catapult (ESC) which has a specific technology and innovation centre set up to help the UK navigate the transformation of our whole energy system and capture the new commercial opportunities created (covering electricity, heat and combustible gases). Initial estimates by the ESC suggest that over £100 million has been invested in related work in the UK over the last 10 years, with the Government investing further R & D in smart systems, industrial energy reduction and offshore wind. However, despite the potential for low income and vulnerable energy consumers to be beneficiaries of this learning, outputs of this work need to be publicly available or centralised as this learning could help accelerate the UK Government's fuel poverty commitments in England over the next 12 years as well as support the other UK nations to meet their own statutory fuel poverty targets (or support more cost-effective decarbonisation). As a result, independent of ECO key learning from these three areas (NIA trials, tax funded via research councils and ECO innovation), must be brought together so the risks around research duplication are lessened and any research gaps can be identified and addressed. One area to address in this context, and more broadly, is how applicable current learning regarding technological innovations is in private sector housing⁸³. Outside of the consultation, NEA would like to work with BEIS to deliver these outcomes.

31. Do you agree that obligated suppliers should have the option of delivering a proportion of their obligation through innovative products, technologies and processes and, if so, where the maximum allowed should sit between 10% and 20%?

Whilst NEA's own work demonstrates the potential for innovative approaches to have direct benefits to low income and vulnerable people, given the limitations of ECO, as noted above, NEA believes the ECO policy could fail to provide the aforementioned advice, support and controls that are necessary to de-risk these projects on behalf of the recipients. Nor does NEA believe the ECO policy should be used as a way of defraying the cost of manufactures own R & D budgets. NEA therefore supports the lower end scale for the size of any innovation ring-fence and highlights the need for the future innovation project under ECO to directly demonstrate tangible outcomes for low income customers like those highlighted above.

32. Do you agree with the proposed routes through which ECO can support innovation? Please provide reasons, and if applicable, any alternative preferred proposals.

We support the innovation scores uplift route proposed in the consultation (or to be more accurate, deflators to current incumbent scores) as this will have fewer risks and will be a better way of stimulating innovation given the wider constraints we note elsewhere in the response⁸⁴. The innovation uplift/deflator option will also ensure the technologies that will benefit will be at a higher Technology Readiness Level (above 8 or 9, for example). They should also be lower cost energy saving products that have been available to the able-to-pay market and therefore are fully tested in domestic properties⁸⁵. Whilst NEA acknowledges there are always some risks that any technologies may not be able to offer 100% confidence in the performance of the product, this would at least reduce the risk (or likelihood) an expensive product will fail. This is especially important given vulnerable and low income residents may be less likely or able to seek the recourse should the technology have a fault⁸⁶.

NEA also notes that the in-situ performance actions that are proposed could also have some benefit in incentivising packages of energy saving measures but stresses that funding outside of ECO must cover the costs of monitoring equipment and the manufactures must provide a clear set of remedial actions and compensation should their products fail to deliver the anticipated outcomes for households. NEA also believes Ofgem need to ensure there is full transparency on which technologies and manufacturers products are being tested at any one time. This information should be kept up to date and be in the public domain. In addition, if the demonstration route does go ahead and its output is intended to be the production of a deemed score, third parties must be able to challenge/contest any reported findings. In general, this information or project reports should therefore be in the public domain or published alongside Ofgem's consultation on any changes to deemed scores (or in the case of a deflator, a decision is made to alter the deemed score of an existing product). These consultations should also be linked to the phases for the ECO3 to provide some predictability of the timing of these revisions.

33. Are there other ways in which suppliers can meet their targets more cost effectively, in order to maximise energy bill savings achieved through the scheme, while also ensuring that work is done to the right standards?

As noted above, NEA believes the proposed innovation scores uplift route could be amended to be based on deflators to current incumbent scores. This is because the use of uplifts within this part of ECO could create a disincentive for manufactures to continue to develop their products unless further uplifts are provided. This in turn risks over incentivising these technologies over and above those that are already delivering and have reduced in price. The use of deflators will also enable the ECO funding to stretch further and therefore would be more cost effective.

Chapter 6: Delivery and Administration

34. Do you think the one month reporting period should be extended? Please provide reasons, including any alternative preferred proposals, and supporting evidence where applicable.

No. NEA is concerned that this could lead to further payment delays to contractors. If the enhanced reporting requirements on capital contributions were embedded systematically into scheme report requirements (a proposal NEA feels is justified and needed) a slightly longer period could be granted for providing the necessary details to comply with this requirement. However, given that it is assumed this information would be provided as part of the signing off period and incorporated into the existing documentation, this additional flexibility is unlikely to be required.

35. If the one month reporting period was extended, do you think the 5% extensions provision could be removed?

Yes. The proposed flexibility for inadvertent mistakes is proportionate as long as the Administrator retains overall discretion for whether an extension request over and above the 5% limit.

36. Do you agree with the proposal to retain the mechanism for the trading of obligations?

Yes. NEA supports this proposal but only if the parent company has delivered sufficient savings to be compliant across all its licences. The ability to trade between obligated parties also ensures that only the suppliers that are committed to meeting the stated aims of the policy continue to deliver the scheme. NEA welcomes the involvement of obligated parties that can help meet the Government's commitment to focus the supplier obligation on households who are most in need. NEA also notes the opportunity for smaller obligated parties (above 50,000 customers) to buy-out of their obligation using this mechanism. If this can be achieved, this could provide a valuable hardship fund which should be delivered in a similar way to Industry Initiatives under Warm Home Discount, redress funding or the Northern Ireland Sustainable Energy Programme (NISEP) which provides direct funding via a levy on consumer bills to improve energy in fuel poor homes⁸⁷.

Consumer Experience and Consumer Contributions

NEA highlights its disappointment that no specific questions were asked in relation to this key theme. As noted in the introduction and response to question 15, NEA believes it is paramount to improve the accessibility and simplify the 'offer' ECO provides to the people the policy should be there to serve. Given the Government's assumption that there will be no household contributions made during the course of the policy⁸⁸, NEA calls for there to be an explicit prohibition of financial contributions that are often required to take part in the ECO scheme. If the Government fail to provide this assurance, as a minimum, any requirement to make household contributions must be capped and monitored rigorously. NEA highlights this was a key observation of the National Audit Office (NAO)'s 2016 investigation into the Green Deal and ECO⁸⁹.

Chapter 7: Quality and Standard

37. Once the quality mark requirements are fully established, functional and enforced, do you agree that in order for installers to deliver ECO measures under the quality mark, they should be quality mark approved and compliant with quality mark requirements?

Yes. NEA supports the Government's attempts to drive up consumer outcomes within ECO. It should also resource the enforcement of quality against this accreditation. As noted above, this should be supported by ECO obligated suppliers communicating the support that is available through ECO in more consistent and assessable formats, installers providing adequate advice to maximise the benefits of the energy saving measures being installed and ensuring suppliers and contractors highlight how other forms of supplier-led assistance can be accessed if the most vulnerable fail to benefit from energy saving measures under the scheme.

NEA also seeks for the Government (and Ofgem) to stipulate the need for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations⁹⁰. We highlight how this can be achieved; by communicating the support that is available through ECO in more consistent and assessable formats⁹¹, provide adequate advice⁹² to maximise the benefits of the energy saving measures being installed and ensure any contractors highlight how other forms of supplier-led assistance can be accessed if the most vulnerable fail to benefit from energy saving measures under the scheme⁹³. In addition, customers that benefit from ECO must be made aware how they can seek redress where the installation fails to deliver the anticipated or promised outcomes. Without adding unreasonable additional costs, NEA believes these steps would radically improve the customer journey for low income and should be set out in a Code of Practice or included as part of the accreditation of the suggested quality mark⁹⁴. As a minimum, the need for obligated suppliers to uphold their obligations to treat their customers fairly and respond to the enhanced needs of those in vulnerable situations must be reflected within the final ECO Guidance.

38. Do you agree that once the quality mark is established and functional, and where we are satisfied with the guarantee principles enforced through the quality mark, all solid wall, cavity wall, park home and room in roof insulation delivered under the scheme should be accompanied by a quality mark approved guarantee in order to receive the standard applicable lifetime?

Yes. NEA supports this in principle, however the quality mark is only as good as the enforcement of this accreditation and it is not clear which oversight body would be responsible for monitoring these requirements. In order for these standards to be delivered they could therefore operate in a similar manner to the Smart Meter Installation Code of Practice (SMICoP) which uses a Self-Certification Proforma as a statement of compliance. This must be completed before any energy supplier ('supplier') can begin the process of installing smart meters for their consumers and they must self-certify that they comply with all aspects of the SMICoP that apply to them, and can provide evidence of their compliance on request. Crucially, compliance and enforcement is undertaken by Ofgem.

39. Do you agree that all ECO measures referenced in PAS 2030 and PAS 2035 should be installed in accordance with PAS2035 and the latest version of the PAS 2030?

Yes. NEA agrees with the revisions to the standard.

40. Do you agree that installers delivering measures referenced in PAS 2030 and PAS 2035 should be certified against PAS 2035 and the latest version of PAS 2030?

Yes. NEA agrees with the proposal and the enhanced standard.

41. Do you consider that heat networks installed under ECO, or connections to heat networks should require specific consumer protection standards?

Yes, as noted above, it is essential that all domestic consumers connected to district heating networks must be protected by adequate consumer protections but particularly those that benefit from Government led programmes. In this context, NEA highlights the findings of a recent Citizens Advice report⁹⁵ which recommended the following:

- As part of its notification procedure for the Heat Networks (Billing and Metering) Regulations 2014 should publish details of the number and location of heat networks across Great Britain. This should be publicly available information.
- All heat suppliers should ensure that customers are billed in a clear and transparent way to ensure they understand how their bill is calculated, know what period their bill covers and how much of their bill is made up of standing charges.

- All heat suppliers should have minimum efficiency standards and a regular maintenance and inspection regime in place. This should include checking all heat meters at least once every two years to make sure users are being billed for the right amount of heat.
- All heat suppliers should, as a minimum, maintain a list of vulnerable customers (a Priority Services Register) and ensure that these customers are treated as a priority during periods of system downtime (both anticipated and unanticipated), bespoke and targeted work is required to provide assistance in helping consumers controlling their heating and understanding their billing.

The report also recommended that the Competition & Markets Authority should launch an investigation into the heat sector with a view to assessing the need for price regulation in the heat supply market. Given the existing CMA process is on-going, any enhanced access to ECO funding proposed within this consultation should be introduced at the mid-way point of the obligation once the review is complete. Where district heating is already being supported under existing provisions within the scheme, any DH projects which benefit from ECO funding must at least be a member of the Heat Trust and ensure all heat suppliers are applying relevant good practice.

42. The Government invites views on the general requirements set out in this consultation and the illustrative draft of the ECO Order.

NEA notes the draft Order. We also highlights that if the following recommendations are adopted, this will require some necessary re-drafting:

- NEA suggests the obligation be split into 2 equal phases, rather than the four phases currently proposed. This will need to be reflected in the final Order.
- NEA believes the supplier thresholds for ECO should be set at 50,000 customers. This needs to be reflected in the final Order.
- NEA does not support obligated suppliers being able to carry forward delivery from ECOT into via CERO or the carry under proposals.
- NEA urges BEIS to urgently review the preferred policy option which aims to increase the size of the eligible Affordable Warmth pool to 6.5 million households. The need for the new eligibility criteria including Ministry of Defence administered benefits, Disability Living Allowance (DLA) and/or Personal Independence Payments (PiP) must be subject to a suitable income cap and reflected in the final Order.
- The "solid wall minimum requirement" and so is the current cap on boilers; both these sub-target should be increased; this must be reflected in the final Order.
- NEA proposes the scoring for first time central heating (FTCH) should only apply in private households and lifetime bill savings of up to £0.9bn should be ring-fenced for the delivery of FTCH up until (2018-2022). Again, this will require a modification and addition to the current draft Order.
- The lower end scale for the size of any innovation ring-fence needs to be reflected as does the provision of deflators to current incumbent scores.
- NEA calls for there to be an explicit prohibition of financial contributions that are often required to take part in the ECO scheme, this should be reflected in the final Order.

In making these recommendations, NEA recognises the time constraints available to re-draft these sections. However, NEA believes it is incumbent on the Government to ensure the regulations fully reflect the need for ECO to be far better targeted on those in or most extreme risk of fuel poverty and to improve the accessibility and simplify the 'offer' ECO provides to the people the policy should be there to serve. Despite the short consultation period, NEA has therefore responded in detail to these proposals in the hope that there is a genuine opportunity to extend the ECO safety net to those households who are in great need, but all too often forgotten. We have offered Government practical ways to help them. We therefore hope these areas will be acted upon and are committed to continuing to work hard alongside the Government to make these proposals a reality.

¹ NEA's recent joint briefing with E3G highlighted the UK has the sixth-worst long-term rate of excess winter mortality out of 30 European countries. Over the last five years there has been an average of 32,000 excess winter deaths in the UK every year. Of these, 9,700 die due to a cold home – the same as the number of people who die from breast or prostate cancer each year. The new analysis was released on Fuel Poverty Awareness Day the national day highlighting the problems faced by those struggling to keep warm in their homes. To read the press release and the full copy of the report visit: <http://www.nea.org.uk/media/news/230218/>.

² In 2016 BRE released its revised Cost of Poor Housing (COPH) report, which estimated the cost of poor housing to the NHS based on EHS and NHS treatment costs from 2011 and includes treatment and care costs beyond the first year. It also includes additional societal costs including the impact on educational and employment attainment. Finally, it provides information in terms of QALYs (Quality adjusted life years) as well as cost benefits, and to compare with other health impacts. The report estimates that the overall cost of poor housing is £2bn, with up to 40% of the total cost to society of treating HHSRS Category 1 hazards falling on the NHS. Overall, the cost to the NHS from injuries and illness directly attributed to sub-standard homes was estimated at £1.4 billion, and the total costs to society as £18.6 billion.² Research by the BRE in 2013 suggested that if all of the English housing stock with a SAP below the historic average of 41 was to be brought up to at least the current average of 51 through heating and insulation improvements, the health cost-benefit to the NHS would be some £750 million per annum.² Other estimates put the costs to the NHS of energy inefficient housing at £192 million (£35 million of which was in the private rented sector). Use of the BRE category 1 calculator put the estimated private rented sector costs to the NHS at between £37 and £674 million depending on SAP rating and occupancy level.

³ Elliot AJ, Cross KW, Fleming DM. Acute respiratory infections and winter pressures on hospital admissions in England and Wales 1990-2005. *J Public Health (Oxf)*. 2008 30(1):91-8.

⁴ For more information visit: www.nea.org.uk.

⁵ NEA also work alongside our sister charity Energy Action Scotland (EAS) to ensure we collectively have a UK wider reach.

⁶ For more information visit: <http://warmzones.co.uk/>.

⁷ For more information visit: www.nea.org.uk/fpeeg/about-fpeeg/.

⁸ Energy Company Obligation (ECO 3) 2018 – 2022 consultation, BEIS 2018, page 9.

⁹ The milestones require the upgrading of as many fuel poor homes as is reasonably practicable to Energy Performance Certificate Band E by 2020 and to Band D by 2025.

According to the Committee on Fuel Poverty (CFP)'s latest annual report published on 17th October 2017 even if the current remaining investment from ECO is netted off, beyond March 2019, £14.4 billion of additional funding will be required to install the necessary energy efficiency measures in fuel poor households in England. As noted in the response, whilst it is welcome the Government's stated intention is to shift the current programmes towards making a bigger difference for fuel poor households; the impact assessment highlights this will not provide the required investment to meet current statutory targets or the near-term milestones.

¹⁰ In Wales the Nest programme delivers energy efficiency improvements for eligible low income, privately owned and privately rented households, who are in receipt of qualifying benefits and have a poor energy efficiency rating. An estimated 79% of contacts were from households living in fuel poverty. The complementary area-based scheme, Arbed, continues to fund the installation of energy efficiency measures in deprived communities and the Wales Infrastructure Investment Plan62 also reiterates their investment in the Warm Homes Programme to drive up energy efficiency improvements to tackle fuel poverty. In Scotland, in June 2015 energy efficiency was designated as a National Infrastructure Priority. The cornerstone of this will be Scotland's Energy Efficiency Programme (SEEP), a 15 to 20-year programme which will offer support to improve the energy efficiency ratings of all domestic and nondomestic buildings in Scotland. SEEP will be launched in 2018 and will be supported by over £500 million of public funding over four years. 'Pathfinder Fund' pilot projects have already begun in areas at risk of having higher levels of fuel poverty and low income, which will shape the delivery of future SEEP. At present the Scottish Government funds the Home Energy Efficiency Programmes for Scotland (HEEPS), which is a cluster of programmes including Area Based Schemes (ABS), a reactive scheme for individuals in need called Warmer Homes Scotland and two loan schemes. Alongside this, the existing Energy Efficiency Standard for Social Housing (ESSH) aims to further improve the energy efficiency of social housing in Scotland by 2020.

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¹² During the passage of the Energy Act, the UK Government gave repeated assurances that the withdrawal of the Exchequer-funded Warm Front programme should not be a matter of concern since the Energy Company Obligation would provide significantly greater resources for fuel poverty programmes. In fact the projected expenditure on the affordable warmth element of the Energy Company Obligation represented a significant reduction in funding to improve energy efficiency in dwellings occupied by low-income and vulnerable households. Prior to the Comprehensive Spending Review of 2010, expenditure on Warm Front had exceeded £1.1 billion over the period 2008–11. This expenditure was augmented by annual expenditure on Priority Groups through the Carbon Emissions Reduction Target of approximately £600 million over that same period, and this in turn was further supplemented by the £350 million Community Energy Saving Programme.

¹³ The 'notional annual spend' on the overall programme was reduced from the original £1.3bn to £640 million in the 2015 spending review.

¹⁴ CFP Annual report, 2017.

¹⁵ CCC, Energy prices and bills - impacts of meeting carbon budgets, March 2017 noted that if the insulation and low-carbon heat installations required to meet the carbon budgets can be successfully targeted at the fuel poor then around three-quarters can be lifted out of fuel poverty by 2030. However, meeting the Government's goal of improving fuel poor homes to efficiency band C by 2030 would require roughly doubling the funding currently provided under the Energy Company Obligation. CCC, Report to Parliament – Meeting Carbon Budgets: Closing the policy gap, 29 June 2017.

¹⁶ Cutting the cost of keeping warm - A fuel poverty strategy for England, DECC, 3 March 2015

¹⁷ On the 24 Mar 2016, The Secretary of State noted the Government were reforming the renewable heat incentive and the energy company obligation to focus more on those most in need, "who are those in fuel poverty".

¹⁸ 13 March 2018

[The Minister for Energy and Clean Growth \(Claire Perry\)](#)

ECO consultation, which we will bring forward shortly. It is my intention, as far as possible, to pivot the whole of ECO to focussing on the challenge of fuel poverty and trying to make sure that those in the greatest poverty receive the greatest benefit,

¹⁹ The delay to a better target ECO policy has already lead to a large shortfall in activity of around £1bn lifetime savings for the poorest households with the highest energy costs over the current 18 month ECO transition period.

²⁰ This calculation is based on the information within table 7: Estimated Progress Against Fuel Poverty Milestones within the BEIS ECO 3 Consultation Stage Impact Assessment, page 18.

²¹ The most acute levels of fuel poverty are in the Private Rented Sector. There are 267,000 F and G rated homes in the private rented sector, with a further 13,000 in Wales (where the PRS regulations also apply). In England, 35% of all fuel poor households in England are in this tenure, over 941,000 households, including almost 500,000 children²¹. NEA's research also finds that in England, whilst 1 in 5 private renters are in fuel poverty, this compares to 1 in 8 social renters and 1 in 14 owner-occupiers. Analysis conducted by NEA of the English Housing Survey also shows 42% of all children in fuel poverty live in the private rented sector. By comparison, a child living in owner-occupied housing has a 1 in 8 chance of being fuel poor. Those tenants suffering from the worst extremes of fuel poverty face excess energy costs (the extra amount they need to spend to keep warm compared to a non-fuel poor household) of £410 per year on average and up to £1,160 per year in private rented F and G properties. By comparison, fuel poor tenants in social housing face gaps of less than half their private rented counterparts (£175 per year). Characteristics of F and G properties may include no central heating, no wall insulation (leading to problems with damp and mould) and old boilers that are inefficient and less safe.

²² Following the findings of the Independent Review of Fuel Poverty in England led by Professor John Hills in July 2013, the UK Coalition Government modified the timetable to address fuel poverty in England and simultaneously confirmed that they would modify the common definition of fuel poverty with a new measurement, specific to England, with immediate effect. The 'new' measurement of fuel poverty under the Low Income High Cost (LHIC) in England is now very different to the definition based on the 10% measurement still used in Wales, Scotland and Northern Ireland. Whilst much of the UK's energy policy is assumed to be a devolved matter, in reality, certainly across Great Britain, the policy mechanisms to address fuel poverty represent a complicated mix of devolved and reserved powers and responsibilities and these need to be fully understood by policy makers.

²³ Whilst much of the UK's energy policy is assumed to be a devolved matter, in reality, certainly across Great Britain, the policy mechanisms to address fuel poverty represent a complicated mix of devolved and reserved powers and responsibilities however both Scotland and Wales have their own statutory duties to eradicate fuel poverty by set dates.

²⁴ The UK Government noted these include impacts on energy prices, impacts on the energy needs of households through improved building fabric, and changes in the way heat is supplied.

²⁵ House of Commons Committee of Public Accounts Household energy efficiency measures, 2016.

Eleventh Report of Session 2016–17 PAC, 2016 said that the Government lacked the information it needs to measure progress against its objectives, including the impact of the schemes on fuel poverty. In its recommendations it said the Government should ensure it has means by which to measure progress towards each of its objectives, particularly on those aimed at improving circumstances for vulnerable people and those living in fuel poverty.

²⁶ Green Deal and ECO investigation, NAO, 2016, page 10 highlights the Government failed to adequately determine the impact of ECO on reducing fuel poverty.

²⁷ BEIS ECO 3 Consultation Stage Impact Assessment, page 17 highlights the number of Fuel Poor Homes Receiving a Measure (in England Only); under op1) 244,000 opt 2) 243,000 and opt 3) 249,000. Page 14 highlights the equity-weighted Net Present Value; under op1) 2,802m opt 2) 3,185m opt 3) 3,009m

²⁸ Net disposal income after housing costs of a low income household is £248 per week (£12,933 per year), equating to 60% of the UK median of £413 per week. The income after housing costs of a fuel poor household is even lower: £10,118 per year, equating to a net disposal weekly income of £194. Investigating income deciles shows the poorest 10% of UK society have a gross average weekly household income of £130 (£6,760 per year). Fuel poor households overwhelmingly comprise the poorest fifth of society: 85% of households in fuel poverty in England are located in the first and second income deciles and 78% of English households in those two deciles are fuel poor. Whilst NEA acknowledges a benefit proxy does not exist which as low as most households in fuel poverty in England, a taper could be used to smooth the levels of support provided with those households closest to the income threshold (i.e those with the highest incomes) able to access measures that provide less support than those in the greatest need.

²⁹ REF

³⁰ The median annual income of a fuel poor household in England after housing costs is £10,118. This is £2,815 below the poverty line.

³¹ We also support this being set at 25% of the obligation.

³² BEIS ECO 3 Consultation Stage Impact Assessment, page 28 notes that given ECO 3's focus on low income, vulnerable and fuel poor households BEIS no longer assumes that householders' will continue to co-fund measures.

³³ Ibid. NEA has also previously stated that improved transparency on this issue could be achieved with little additional administration in the short-term alongside the existing sign off process. It simply requires the supplier or contractor to record whether any contributions have been sought from the householder (and for which different energy efficiency measures and how they are paid for). The scheme administrator can then undertake a small follow up audit across different measures and geographic areas to make sure this information was accurate, then share this information so it is possible to advise households on whether different contributions are proportionate or whether a householder (or landlord) is being misled. Collecting this information in a predictable, periodic manner is critical to BEIS in order to determine accurate on-going delivery costs and whether to end contributions all together. As noted in our response, that this was key observation and recommendation of the National Audit Office (NAO)'s investigation into the Green Deal and Energy Company Obligation (ECO). This report stated there were "significant gaps in the Department's information on costs, which means it is unable to measure progress towards two of its objectives. The Department collects some cost information from households, suppliers and the brokerage platform. But the information does not show households' contribution to measures installed under ECO, nor how much each measure has cost suppliers. This means the Department cannot track accurately whether it is achieving its aims of improving harder-to-treat homes more efficiently and getting households to bear more of the cost of measures".

³⁴ These principles are set out in the Standards of Conduct (SLC 0 and SLC 0A). These are enforceable overarching rules aimed at ensuring licensees, and their representatives in the case of domestic suppliers, treat each domestic and microbusiness customer fairly. These broad principles relate to how suppliers behave, provide information, and carry out customer service processes. In the case of domestic consumers, the Standards also relate to how suppliers seek to identify each consumer in a vulnerable situation and respond to their needs.

³⁵ Whilst there is some information provided on what support ECO provides by energy suppliers, a number of Government-sponsored websites, consumer organisations, statutory bodies and charities etc. NEA believes there is a need to ensure that material is clear and consistent, does not confuse those in need of advice and that support on more complex issues is readily available and suitable for all households. The sources of advice discussed above are too numerous for an overall assessment within this response however BEIS should establish the extent to which current sources of information meet the criteria of comprehensive, impartial advice tailored to individual circumstances including the needs of low-income and vulnerable households, those who don't speak English as a first language, those with limited financial capability, limited internet access and where tenure and a landlord's stipulations require onward consent.

³⁶ The Energy Saving Trust has produced guidelines on providing effective advice to tenants. Energy Saving Trust, Guidance on Energy Efficiency Advice to Tenants, London: Energy Saving Trust, 2007 says that if advice is to be effective it needs to be specific to individuals and their circumstances and the distribution of general information (e.g. leaflets) is not considered to be energy advice. The areas where residents regularly need advice on installations are as follows; if the new system is replacing the main heating source (for example a heat pump is installed) it is necessary to explain not only the operation of that specific technology but the full system, including implications of changing controls (for example, how to work the programmer, setting room thermostats). If the new system is expected to save the household money, the advice/provider should be able to explain this in the context of the individual, for instance, how the new system will require changes in paying for fuel (for example, the most appropriate tariffs, changes to the amount the householder may have to pay through direct debit, to what extent the new technology will require a household that is off the gas grid to reduce or stop the delivery of solid or liquid fuels). The advice/provider should also be able to explain running costs of the new system (for example, expected savings, inclusive of any expected comfort taking, the costs of servicing, the cost of using electric boost functions and how this might vary depending on the time of day/tariff and/or any need for supplementary electric heaters). The advice/provider should also be able to offer further advice and support (for example, other low-cost and no-cost measures that could be adopted, local and national grant and discount schemes, or who to contact for further advice or repairs). The advice/provider should offer follow-up visits/helpline for those customers who need further help after the installation process. Where advice of this nature is provided directly the practical results are hugely positive. Through the provision of advice, there is a key opportunity to both amplify the benefits of the technology and to maximise the experience of the initiative/programme that helped finance the project in general (Feed-in Tariff scheme, Renewable Heat Incentive, ECO or a local initiative). This in turn can have a positive impact on the take up of these schemes amongst friends, family and neighbours etc.

³⁷ Energy suppliers offer a range of services but these are often poorly promoted as part of ECO by obligated parties or their suppliers and contractors. Without adding costs to the ECO scheme, obligated parties and their suppliers and contractors should be able to provide information on how households can register for priority services, get the best energy tariff, check if they can receive the WHD and hence benefit from the Safeguard Tariff, make a meter reading, benefit from a smart meter, how to maximise their income, contact their supplier to discuss energy debt, benefit from a carbon Monoxide alarm or free gas safety check.

³⁸ NEA believes these requirements should be made clear in a similar way to the Smart Meter Installation Code of Practice (SMICoP) which use a Self-Certification Pro-forma as a statement of compliance. This must be completed before any energy supplier ('supplier') can begin the process of installing smart meters for their consumers and they must self-certify that they comply with all aspects of the SMICoP that apply to them, and can provide evidence of their compliance on request.

³⁹ British Gas, the UK's largest home energy supplier, said on Saturday 3rd March it had received more than 136,000 boiler breakdown reports during the cold weather period and yet there have been virtually no repairs to gas boilers carried out under the only remaining energy efficiency scheme in England (the Energy Company Obligation, ECO) since it began last April.

⁴⁰ The Government committed reforming the renewable heat incentive and the energy company obligation to focus more on those most in need, who are those in fuel poverty in 2016. It is therefore very disappointed that the Regulations related to the new RHI Scheme - which were debated by MPs in April have failed to reflect provide any enhanced access to this policy or respond to the recommendations of the CGP or CCC. In the words of the House of Lords Secondary Legislation Scrutiny Committee, which examined the policy merits of secondary legislation: "It is clear that the Department's commitment to reforming the RHI scheme needs to be rigorous and on-going if the deficiencies of the past are to be redressed".

⁴¹ Within NEA's response to Ofgem Consultation on potential change to the Fuel Poor Network Extension Scheme, NEA recognised the merits of improving targeting of the FPNS scheme, delivering better value for money for existing and future gas customers and better integrating the criteria to reflect national and Great Britain (GB)-wide energy efficiency schemes. Without adapting the current approach, we noted it is likely that remaining connections under FPNS will continue to disproportionately benefit social housing tenants and their landlords within eligible IMD areas. Recognising the limitations of using England statistics for a GB-wide scheme, we nonetheless noted that only 17% of properties in England are social rented and that this tenure contains the fewest number of fuel poor households in England. By contrast, private renters are the most likely tenure group to find themselves in fuel poverty but NEA understands that very few fuel poor connections have been delivered to this tenure. As such, we recognise that the current IMD criterion has not incentivised GDNs to deliver connections to deprived households who may be harder to engage (in particular, fuel poor private tenants) but who have much to benefit from the scheme. The merits of better targeting notwithstanding, NEA also said it remains concerned about the pace of Ofgem's proposed change consistently highlighted how power under the Digital Economy Act should allow network companies to directly access information from central Government about the support energy suppliers can provide to eligible households in their area which would help them identify some of the most vulnerable customers and deliver more bespoke solutions to them.

⁴² In from the Cold: The funding gap for non-gas fuel poor homes under ECO and a proposal to fill it, NEA, February 2017.

⁴³ The report noted that because those off the gas network are more reliant on expensive fuels such as electricity, fuel poor households off the gas grid experience average fuel poverty gaps that are double those of on-gas fuel poor. Since then, the latest fuel poverty statistics highlight the same pressing gap, (on gas fuel poor have average gaps of £296 vs off-gas £607).

⁴⁴ For further information visit: <http://www.nea.org.uk/hip/technical-innovation-fund/>.

⁴⁵ NEA notes that the use of uplifts within this part of ECO could create a disincentive for manufacturers to continue to develop their products unless further uplifts are provided. This in turn risks over incentivising these technologies over and above those that are already delivering and have reduced in price. The use of deflators will also enable the ECO funding to stretch further.

⁴⁶ BEIS ECO 3 Consultation Stage Impact Assessment, page 10 notes only around 8,000 privately rented homes below EPC Band E are expected to be treated during the ECO 3, the majority of which would be expected to occur during 2019 across GB.

⁴⁷ From April 2018, landlords will not be able to rent out properties with energy efficiency ratings below EPC Band E (exemptions apply). The regulations apply to the domestic private rented sector in England and Wales. This is defined in section 42 of the Energy Act 2011 as properties let under an assured tenancy for the purposes of the Housing Act 1988, or a tenancy which is a regulated tenancy for the purposes of the Rent Act 1977. A high percentage of fuel poor households also live in the worst properties in the deepest fuel poverty are renting from private landlords, they must be prioritised for assistance.

⁴⁸ Social housing properties are typically much more energy efficient compared to other tenures. This is very clear from the tables within NEA's response which are taken from respective housing data from across all of GB. Across Wales and England, this was due to a significant tax-paid investment via the Decent Homes programme which (in a very welcome way) has meant social housing is now considerably more energy efficient compared to other tenures. As a consequence, this also means there are also fuel poor households in social housing. This is most evident in England where the LIHC definition applies. This isn't simply true of the headcount of fuel poor households but also the fuel poverty gap. This is lowest for the social rented sector (housing association and local authority), which are substantially below the average fuel poverty gap for England. The fuel poverty gap sits around the average for households in the owner occupied sector; with the highest depth of fuel poverty seen for private rented households (£410). Whilst NEA acknowledges that social housing tenants are more likely on a low income, their housing costs have not risen to such an extent. As a result, where ECO is now such limited resource given it has been reduced by ½ compared to what it was initially, we have had to make some hard choices about who we say should be prioritised with this assistance. In deciding these priorities, NEA stresses that we hope the gap this may create for social tenants can in part be offset by their social landlords who receive funding to maintain these properties. We have therefore been trying to also highlight the business case for social landlord investing in their own stock themselves to improve the capital value of the property. We have been involved in research which has found for example that energy efficiency improvements help to reduce rent arrears and void periods etc.

⁴⁹ One of the key recommendations in NEA's recent response to the PRS regulations was the reintroduction LESA. LESA was introduced by the UK Government in Budget 2004, with the aim of encouraging landlords to improve the energy efficiency of let residential properties by providing a maximum tax allowance⁴⁹ of £1,500 per dwelling which landlords could claim against the costs of buying and installing cavity wall, loft, solid wall, floor and hot water system insulation and draught-proofing. It ended in April 2015 and whilst LESA had very low take-up, combined with these new regulations and a higher tax relief threshold, (reflecting the £5,000 cap) this could be a powerful incentive.

⁵⁰ NEA's recent response to the Domestic Private Rented Sector minimum level of energy efficiency consultation highlighted the need to build capacity of local authority environmental health officers (EHO) to enforce the Housing Health and Safety Rating System (HHSRS); Introduce a nation-wide mechanism that enables local authorities to specify how many improvement notices under HHSRS have been served to landlords for category one and two hazards and for what reasons (e.g. excess cold); consider a central resource for an 'EHO of last resort' which would act as a backstop for the enforcement of housing standards; consider reintroducing the Landlord's Energy Savings Allowance (LESA) to incentivise landlord energy efficiency investment; Improve homes in multiple occupation (HMO) properties to the same national standards as the PRS and consult on developing and introducing a mandatory national licencing scheme for private landlords in England.

⁵¹ Draft National Infrastructure Assessment, National Infrastructure Commission, October 2017.

⁵² Committee on Climate Change, Next steps for UK heat policy, October 2016.

⁵³ The Fuel Poverty Action Plan, Greater London Authority (GLA), June 2017.

⁵⁴ Age UK. 2012. The cost of cold: Why we need to protect the health of older people in winter.

⁵⁵ NEA estimates that some families in fuel poverty are facing an income shortfall of up to £9,331 per year (£778 per month) to cover basic essentials, including energy. As noted below, NEA has also warned many low income households could miss out on energy rebates and the proposed new safeguard price cap. The findings are included as part of our "Bridging the Gap" report which highlights the scale of the impossible choices families will be making this winter.

⁵⁶ NEA has helped produce a new report by Frontier Economics which recommends a comprehensive Buildings Energy Infrastructure Programme to achieve major energy savings across the UK. Key recommendations include introducing a new target for all low-income households achieving a C rating by 2030 and subsidies for all low-income home-owners to make energy efficiency renovations to their properties.

⁵⁷ A range of organisations have noted this key opportunity; Better Homes: Incentivising Home Energy Improvements, Hall and Caldecott 2016, p27; Too Hot to Handle? How to decarbonise domestic heating, Howard and Bengherbi 2016, p.14; A report on initial positions, Committee on Fuel Poverty 2016, p4; After the Green Deal: Empowering people and places to improve their homes, recommendation 5, Rosenow and Sagar 2015; Effective Policy Efficient Homes, Confederation of British Industry (CBI) 2015, p2 and CCC, Meeting Carbon Budgets – 2016 Progress Report to Parliament, June 2016. More recently that investment in energy efficiency targeted at fuel poverty must double.

⁵⁸ NIESP provides direct funding via a levy on consumer bills to improve energy in fuel poor homes.

⁵⁹ The Government committed reforming the renewable heat incentive and the energy company obligation to focus more on those most in need, who are those in fuel poverty in 2016. It is therefore very disappointed that the Regulations related to the new RHI Scheme - which were debated by MPs in April have failed to reflect provide any enhanced access to this policy or respond to the recommendations of the CGP or CCC. In the words of the House of Lords Secondary Legislation Scrutiny Committee, which examined the policy merits of secondary legislation: "It is clear that the Department's commitment to reforming the RHI scheme needs to be rigorous and on-going if the deficiencies of the past are to be redressed".

⁶⁰ These principles are set out in the Standards of Conduct (SLC 0 and SLC 0A). These are enforceable overarching rules aimed at ensuring licensees, and their representatives in the case of domestic suppliers, treat each domestic and microbusiness customer fairly. These broad principles relate to how suppliers behave, provide information, and carry out customer service processes. In the case of domestic consumers, the Standards also relate to how suppliers seek to identify each consumer in a vulnerable situation and respond to their needs.

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⁶² The delay to a better target ECO policy has already led to a large shortfall in activity of around £1bn lifetime savings for the poorest households with the highest energy costs over the current 18 month ECO transition period.

⁶³ Along with Rockwool and British Gas, NEA sponsored a new piece of research with Sustainable Homes "Touching the voids report: The impact of energy efficiency on landlord income and business plans"

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⁶⁵ Ibid ref 20

⁶⁶ On the 24 Mar 2016, The Secretary of State noted the Government were reforming the renewable heat incentive and the energy company obligation to focus more on those most in need, "who are those in fuel poverty".

⁶⁷ Heat Decarbonisation: Potential impacts on social equity and fuel poverty, Maxine Frerk, Grid Edge Policy; Dr Keith MacLean, Providence Policy, September 2017.

⁶⁸ Whist ECO continues to provide some limited support for gas boilers, from a high of 85,000 boilers installed from the three months October to December 2013, only 13,037 boilers were installed in the five months from April to August 2017, only c. 5,500 were gas boiler replacements, less than 6% of what they were at the start of ECO in 2013. There have currently been no repairs under the scheme since April 2017.

⁶⁹ Ofgem noted earlier this year that there are around 1.8m electric heating households in England (8%) with higher proportions in Scotland, 0.3m (13%), and lower proportions in Wales, where there are less than 100,000 (5%), homes using electric heating. A substantial minority (0.5m) use direct-acting heating systems without storage functionality, which instead generate heat instantly when needed, and use electricity at that time. The majority of these are electric room heaters which are high energy inefficient. Households that use electric heating tend to be of lower income. In England, around a third have incomes of less than about £14,500. This combined with higher costs of heating, means these households are more likely to be fuel poor.

⁷⁰ Carbon monoxide (CO) is a poisonous gas that in homes is caused by unsafe or the misuse of gas, oil and solid fuel appliances, along with poor ventilation. Limited research (e.g. Ezratty et al., 2011, Kokkarinen et al., 2014) suggests that those on low incomes and who struggle to afford heating costs may be more vulnerable to CO poisoning. Between 2015-2017 NEA worked with the Gas Safety Trust and GDNs to further investigate this relationship between CO exposure risk and household vulnerability. NEA would be happy to share the findings of our most recent report; "Understanding Carbon Monoxide Risk in Households on Low Incomes and in Vulnerable Situations".

⁷¹ In a typical semi-detached home, upgrading heating controls and replacing a gas boiler that is around 80 per cent efficient (D rated) with a new boiler will save around £85 a year, whereas replacing a boiler that is 70% efficient (G-rated) could save over £300 a year. (This is based on a 70 per cent or below efficient boiler with no heating controls being replaced by an at least 90 per cent efficient boiler with heating controls.) Households which have the worst performing boilers could save even more than this. Heating and hot water accounts for about 60 per cent of what a household spends in a year on energy bills, so an efficient boiler makes a big difference, especially to those households which are struggling to pay their energy bills.

⁷² Replacing a boiler could save between 0.3 and 1.5 tonnes of CO₂ each year depending on the efficiency of the boiler being replaced. 1.5 tonnes of CO₂ is the equivalent of a return flight from London to San Francisco. Boiler replacement will also have a positive impact on air quality.

⁷³ The National Health Service estimate that every year in the UK, more than 200 people go to hospital with suspected carbon monoxide poisoning, which leads to around 50 deaths.

⁷⁴ For example an old disused back boiler can explode if they are left unused and empty. *Woman's coffee table saves her from being chopped in half when central heating boiler explodes like a bomb*, 14 January 2015.

⁷⁵ See: <http://www.nea.org.uk/hip/technical-innovation-fund/>.

⁷⁶ In from the Cold: The funding gap for non-gas fuel poor homes under ECO and a proposal to fill it, NEA, February 2017.

⁷⁷ The report noted that because those off the gas network are more reliant on expensive fuels such as electricity, fuel poor households off the gas grid experience average fuel poverty gaps that are double those of on-gas fuel poor. Since then, the latest fuel poverty statistics highlight the same pressing gap, (on gas fuel poor have average gaps of £296 vs off-gas £607).

⁷⁸ Within NEA's response to Ofgem Consultation on potential change to the Fuel Poor Network Extension Scheme, NEA recognised the merits of improving targeting of the FPNES scheme, delivering better value for money for existing and future gas customers and better integrating the criteria to reflect national and Great Britain (GB)-wide energy efficiency schemes. Without adapting the current approach, we noted it is likely that remaining connections under FPNES will continue to disproportionately benefit social housing tenants and their landlords within eligible IMD areas. Recognising the limitations of using England statistics for a GB-wide scheme, we nonetheless noted that only 17% of properties in England are social rented and that this tenure contains the fewest number of fuel poor households in England. By contrast, private renters are the most likely tenure group to find themselves in fuel poverty but NEA understands that very few fuel poor connections have been delivered to this tenure. As such, we recognise that the current IMD criterion has not incentivised GDNs to deliver connections to deprived households who may be harder to engage (in particular, fuel poor private tenants) but who have much to benefit from the scheme. The merits of better targeting notwithstanding, NEA also said it remains concerned about the pace of Ofgem's proposed change consistently highlighted how power under the Digital Economy Act should allow network companies to directly access information from central Government about the support energy suppliers can provide to eligible households in their area which would help them identify some of the most vulnerable customers and deliver more bespoke solutions to them.

⁷⁹ NEA notes that the use of uplifts within this part of ECO could create a disincentive for manufacturers to continue to develop their products unless further uplifts are provided. This in turn risks over incentivising these technologies over and above those that are already delivering and have reduced in price. The use of deflators will also enable the ECO funding to stretch further.

⁸⁰ £4.5m was awarded in grants for capital measures installation. Working with our partners, NEA was able to secure £2.5m additional match and/or gap funding securing 49p for every £1 spent. This in turn increased the number of households we were able to assist from 2,166 households receiving at least 1 measure forecast to raise to 2,204 during 2017/18, exceeding the overall TIF target by 48%. In all 2,681 measures were installed, forecast to increase to 2,719 during 2017/18. Alongside this, 292 frontline workers were trained, and 946 residents were directly supported by NEA Project Development Coordinators. 700 engaged in the product monitoring processes.

⁸¹ Please read the interim report technical evaluation here: https://www.nea.org.uk/wp-content/uploads/2017/09/TIF_Report_2017-FINAL-FOR-PRINT.pdf.

⁸² NEA notes that the use of uplifts within this part of ECO could create a disincentive for manufacturers to continue to develop their products unless further uplifts are provided. This in turn risks over incentivising these technologies over and above those that are already delivering and have reduced in price. The use of deflators will also enable the ECO funding to stretch further.

⁸³ Under TIF, beneficiaries were predominantly living in social housing, (82%). NEA has therefore highlighted the critical need to develop approaches to engage private landlords and home owners with more innovative products (all of which needs to be installed properly, explained to households, run efficiently/maintained/serviced and then decommissioned safely). Our TIF projects either relied on the contractor, social landlord or our own project co-ordinators to perform these functions. This therefore presents a big challenge to get private landlords to engage, provide co-funding and/or ensure private householders feel more confident performing some of these key roles.

⁸⁴ NEA notes that the use of uplifts within this part of ECO could create a disincentive for manufacturers to continue to develop their products unless further uplifts are provided. This in turn risks over incentivising these technologies over and above those that are already delivering and have reduced in price. The use of deflators will also enable the ECO funding to stretch further.

⁸⁵ Many of the technologies installed under TIF had not gone through the testing process required for inclusion in RdSAP methodology, which can prevent local authorities and social landlords from investing in innovation where no SAP improvement is possible however they had mainly been tested in homes or extensive risk assessments and partner diligence carried out.

⁸⁶ Given the challenges associated with the provision of warranties for conventional measures under ECO, energy consumers should not be expected to pay for any remedial work or enhanced monitoring. In terms of the latter, NEA also notes that one very practical insight from TIF was for some monitoring back up equipment to fail when a household was off supply – say in the case of a self-disconnection and/or where a wifi connection could not be sustained. If these instances occurred under the 3 ECO innovation route, any value of the project (and the genesis of the life time saving reward for the supplier) would potentially be lost.

⁸⁷ For more information on NIESP see: <https://www.uregni.gov.uk/news-centre/update-northern-ireland-sustainable-energy-programme-niesp> and a list of local schemes it funds <https://www.uregni.gov.uk/sites/uregni/files/media-files/NIESP%20List%20of%20Schemes%202017-18%20-%20revised%20June.pdf>.

⁸⁸ Ibid. BEIS ECO 3 Consultation Stage Impact Assessment, page 28 notes that given ECO 3's focus on low income, vulnerable and fuel poor households BEIS no longer assumes that householders' will continue to co-fund measures.

⁸⁹ NEA has also previously stated that improved transparency on this issue could be achieved with little additional administration in the short-term alongside the existing sign off process. It simply requires the supplier or contractor to record whether any contributions have been sought from the householder (and for which different energy efficiency measures and how they are paid for). The scheme administrator can then undertake a small follow up audit across different measures and geographic areas to make sure this information was accurate, then share this information so it is possible to advise households on whether different contributions are proportionate or whether a householder (or landlord) is being misled. Collecting this information in a predictable, periodic manner is critical to BEIS in order to determine accurate on-going delivery costs and whether to end contributions all together. As noted in our response, that this was key observation and recommendation of the National Audit Office (NAO)'s investigation into the Green Deal and Energy Company Obligation (ECO). This report stated there were "significant gaps in the Department's information on costs, which means it is unable to measure progress towards two of its objectives. The Department collects some cost information from households, suppliers and the brokerage platform. But the information does not show households' contribution to measures installed under ECO, nor how much each measure has cost suppliers. This means the Department cannot track accurately whether it is achieving its aims of improving harder-to-treat homes more efficiently and getting households to bear more of the cost of measures".

⁹⁰ These principles are set out in the Standards of Conduct (SLC 0 and SLC 0A). These are enforceable overarching rules aimed at ensuring licensees, and their representatives in the case of domestic suppliers, treat each domestic and microbusiness customer fairly. These broad principles relate to how suppliers behave, provide information, and carry out customer service processes. In the case of domestic consumers, the Standards also relate to how suppliers seek to identify each consumer in a vulnerable situation and respond to their needs.

⁹¹ Whilst there is some information provided on what support ECO provides by energy suppliers, a number of Government-sponsored websites, consumer organisations, statutory bodies and charities etc, NEA believes there is a need to ensure that material is clear and consistent, does not confuse those in need of advice and that support on more complex issues is readily available and suitable for all households. The sources of advice discussed above are too numerous for an overall assessment within this response however BEIS should establish the extent to which current sources of information meet the criteria of comprehensive, impartial advice tailored to individual circumstances including the needs of low-income and vulnerable households, those who don't speak English as a first language, those with limited financial capability, limited internet access and where tenure and a landlord's stipulations require onward consent.

⁹² The Energy Saving Trust has produced guidelines on providing effective advice to tenants. Energy Saving Trust, Guidance on Energy Efficiency Advice to Tenants, London: Energy Saving Trust, 2007 says that if advice is to be effective it needs to be specific to individuals and their circumstances and the distribution of general information (e.g. leaflets) is not considered to be energy advice. The areas where residents regularly need advice on installations are as follows; if the new system is replacing the main heating source (for example a heat pump is installed) it is necessary to explain not only the operation of that specific technology but the full system, including implications of changing controls (for example, how to work the programmer, setting room thermostats). If the new system is expected to save the household money, the advice/advice provider should be able to explain this in the context of the individual, for instance, how the new system will require changes in paying for fuel (for example, the most appropriate tariffs, changes to the amount the householder may have to pay through direct debit, to what extent the new technology will require a household that is off the gas grid to reduce or stop the delivery of solid or liquid fuels). The advice/advice provider should also be able to explain running costs of the new system (for example, expected savings, inclusive of any expected comfort taking, the costs of servicing, the cost of using electric boost functions and how this might vary depending on the time of day/tariff and/or any need for supplementary electric heaters). The advice/advice provider should also be able to offer further advice and support (for example, other low-cost and no-cost measures that could be adopted, local and national grant and discount schemes, or who to contact for further advice or repairs). The advice/advice provider should offer follow-up visits/helpline for those customers who need further help after the installation process. Where advice of this nature is provided directly the practical results are hugely positive. Through the provision of advice, there is a key opportunity to both amplify the benefits of the technology and to maximise the experience of the initiative/programme that helped finance the project in general (Feed-in Tariff scheme, Renewable Heat Incentive, ECO or a local initiative). This in turn can have a positive impact on the take up of these schemes amongst friends, family and neighbours etc.

⁹³ Energy suppliers offer a range of services but these are often poorly promoted as part of ECO by obligated parties or their suppliers and contractors. Without adding costs to the ECO scheme, obligated parties and their suppliers and contractors should be able to provide information on how households can register for priority services, get the best energy tariff, check if they can receive the WHD and hence benefit from the Safeguard Tariff, make a meter reading, benefit from a smart meter, how to maximise their income, contact their supplier to discuss energy debt, benefit from a carbon Monoxide alarm or free gas safety check.

⁹⁴ NEA believes these requirements should be made clear in a similar way to the Smart Meter Installation Code of Practice (SMICoP) which use a Self-Certification Pro-forma as a statement of compliance. This must be completed before any energy supplier ('supplier') can begin the process of installing smart meters for their consumers and they must self-certify that they comply with all aspects of the SMICoP that apply to them, and can provide evidence of their compliance on request.

⁹⁵ District Heating Networks: Analysis of information request, Citizens Advice, January 2016.