

Consultation

Ofgem's Administration Consultation: Great British Insulation Scheme and ECO4 Amendment

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We are consulting on our proposed administration for the Great British Insulation Scheme which will support the existing Energy Company Obligation Scheme (ECO4) in the delivery of additional energy efficiency measures targeted at a wider range of households. The Great British Insulation Scheme is intended to run from 30 March 2023 until March 2026. The Great British Insulation Scheme was previously referred to and consulted on by the Department for Energy Security and Net Zero under the name 'ECO+'. The Department for Energy Security and Net Zero was previously known as the Department for Business, Energy and Industrial Strategy (BEIS).

We would like views from any stakeholders with an interest in the Great British Insulation Scheme. This document outlines the scope, purpose, consultation questions and how you can get involved. Once the consultation is closed, we will consider all responses. In the interest of transparency, we will publish the responses we receive alongside a decision on next steps on our website at:

[Consultations | Ofgem](#)

If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why.

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1. Introduction

What are we consulting on?

- 1.1 The Great British Insulation Scheme is a new scheme which started on 30 March 2023 to run until 31 March 2026. Energy suppliers are able to voluntarily deliver measures sooner, ahead of the legislation coming into force, and we are working with both the Department for Energy Security and Net Zero and energy suppliers to facilitate this as far as possible. Details about the scheme can be found in the Great British Insulation Scheme Government Response¹. Existing Government schemes, including ECO4, are multi-measure schemes that seek to treat a whole house, and to prepare homes adequately for low-carbon heating technologies. In contrast, the Great British Insulation Scheme is deliberately designed to be a predominantly single measure scheme, focusing on installing the most cost-effective measures to achieve energy bill savings in as many houses as possible.
- 1.2 Ofgem ('we', 'us' and 'our' in this document) propose to administer the Great British Insulation Scheme through new regulations (the 'ECO4A Order') that place obligations on the medium to larger energy suppliers to deliver notional annual bill savings through the delivery of energy efficiency measures.
- 1.3 For each relevant area that the ECO4A Order sets out, we outline the policy and how we propose to administer the policy.
- 1.4 This consultation focuses on how Ofgem proposes to administer the Great British Insulation Scheme. It also highlights ECO4 amendments and administration that will be adopted from ECO4 for the Great British Insulation Scheme.
- 1.5 We have previously published a separate consultation on Great British Insulation Scheme local authority and supplier flex proposals therefore this area will not be covered within this administration consultation. You can find our LA and Supplier Flex consultation² on our website.

Disclaimer

- 1.6 Where we have summarised the government's position, this is for the purposes of providing context to aspects of scheme administration that we are consulting on, and is not intended to be, nor is it, a full indication of the full policy. For more

¹ [Great British Insulation Scheme \(2023-2026\) and Amendments to ECO4 regulations: government response \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/consultations/great-british-insulation-scheme-2023-2026-and-amendments-to-eco4-regulations/government-response)

² [Great British Insulation Scheme and ECO4 LA and Supplier Flex Consultation | Ofgem](https://www.ofgem.gov.uk/consultation/consultation-great-british-insulation-scheme-and-eco4-la-and-supplier-flex-consultation)

details and a more extensive outline on the Government’s position, readers should refer to the Government Response.

- 1.7 This consultation outlines our proposed administration of the Great British Insulation Scheme. The Government has set out its intentions in its Government Response, which has informed the legislation, but in the unlikely event that there are minor changes between this consultation and when the regulations are laid in Parliament - and we deem those differences to have a material impact on the administration of the scheme - we will consider whether further stakeholder engagement is necessary.
- 1.8 Please be aware that this is a consultation on the administration process that we propose to use to assess and judge compliance with the scheme requirements. We are not consulting on the legislation underpinning the Great British Insulation Scheme requirements or the policy itself. Legislation for the scheme falls under the remit of the Department for Energy Security and Net Zero which has previously published its own consultation on this area - details of which can be found via the link shown in the list of related publications below. If you have any queries about the policy itself, please direct these to the Department for Energy Security and Net Zero. You can find contact details on its website at [Department for Energy Security and Net Zero - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/department/department-for-energy-security-and-net-zero).

Context and related publication

- Department of Energy Security and Net Zero Great British Insulation Scheme Government consultation
<https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>
- Department of Energy Security and Net Zero Great British Insulation Scheme Government Response
<https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>
- ECO4 Guidance: Supplier Administration
<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-supplier-administration-v10>
- Energy Company Obligation (ECO4) Guidance: Delivery
<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery>

- Ofgem Great British Insulation Scheme LA and Supplier Flex Consultation
<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-la-and-supplier-flex-consultation>
- The Electricity and Gas (Energy Company Obligation) Order 2022
<https://www.legislation.gov.uk/ukdsi/2022/9780348236606/part/1>

Guide to this consultation

- 1.9 We are seeking views on our proposed administration of the Great British Insulation Scheme. This consultation will be open for four weeks and will close on 16 June 2023.
- 1.10 To enable swift implementation of the Great British Insulation Scheme, we intend to keep the scheme administration as closely aligned to ECO4 as possible (with the key exception of multiple measure delivery requirements).
- 1.11 As stated above, we have published a separate consultation on LA and Supplier Flex which can be found on our website³.

³ [Great British Insulation Scheme and ECO4 LA and Supplier Flex Consultation | Ofgem](#)

Consultation Stages

Stage 1	Stage 2	Stage 3	Stage 4
Consultation opens	Consultation closes (awaiting decision). Deadline for responses	Responses reviewed and published	Consultation decision/policy statement
11/05/2023	16/06/2023	Approximately beginning of August 2023	Approximately beginning of August 2023

How to respond

- 1.12 We would like to hear from a wide range of stakeholders, including consumer representatives, energy suppliers and those with an interest in energy efficiency and fuel poverty policies.
- 1.13 Please send your response to GBISConsultation@ofgem.gov.uk by 16 June 2023.
- 1.14 We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 1.15 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, data and confidentiality

- 1.16 You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.
- 1.17 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.18 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in

domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see [Appendix 3](#).

- 1.19 If you wish to respond confidentially, we will keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

- 1.20 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:

- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Were its conclusions balanced?
- Did it make reasoned recommendations for improvement?
- Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

2. Suppliers

Section summary

This section will address the implications the Great British Insulation Scheme will have on obligated suppliers and will provide details on obligation thresholds, targets, scheme launch and cost assumption.

- 2.1 The Great British Insulation Scheme will run between 2023 and 2026 and will be split into three phases. Under the Great British Insulation Scheme, the government proposes to have the same supplier obligation thresholds as ECO4: 150,000 customer accounts and supply volumes of 300GWh/year for electricity and/or 700 GWh/year gas.
- 2.2 Obligated suppliers will have annual phase targets, at least 90% of which must be achieved through measures delivered within that year. We propose to monitor progress towards achieving these using notified and provisionally approved measures to make a final determination of whether the minimum requirements in relation to targets have been met at the end of the scheme.

Obligation thresholds

- 2.3 The Great British Insulation Scheme will obligate larger energy suppliers, mirroring those suppliers obligated under ECO4. If a licence holder is a participant in relation to an ECO4 phase, they will also be a participant for the equivalent phase of the Great British Insulation Scheme. Therefore suppliers will be obligated if:
- As a supplier or member of a supply group they supply gas or electricity to 150,000 or more domestic customers (dual fuel customers are counted twice) at the end of the qualification year⁴
 - and
 - Supply either 300 gigawatt hours or more of electricity or 700 gigawatt hours or more of gas to those domestic customers in the qualification year for that phase.
- 2.4 Similarly, suppliers' obligations will be based on notional annual energy bill savings.

⁴ The qualification years will be 2022 for Phase A, 2023 for Phase B and 2024 for Phase C.

- 2.5 The whole scheme total target to be achieved by 31 March 2026 is expected to be just over £57 million in notional annual bill savings⁵.
- 2.6 The Great British Insulation Scheme will differ from previous ECO schemes in setting annual Phase targets and requiring a minimum level of delivery against these for each of the first two years, in addition to the full scheme target. At least 90% of the annual phase targets must be met through measures delivered by the end of the relevant Phase year. This (minimum) delivery requirement will apply to both a supplier's overall phase target and also a low-income proportion set at 20% of the whole (see 2.6). The three phases will be as follows:
- Phase A: Scheme commencement date - 31 March 2024 (concurrent with Phase 2 of ECO4)
 - Phase B: 1 April 2024 – 31 March 2025 (concurrent to Phase 3 of ECO4)
 - Phase C: 1 April 2025 – 31 March 2026 (concurrent to phase 4 of ECO4)
- 2.7 Suppliers will also have a total scheme target which must be achieved by the end of the scheme. This will be the total sum of each of the annual targets. However at this point at the end of the scheme there will not be any carry-over or carry-under considerations to factor in. For this scheme, the term 'carry-over' refers to annual bill savings delivered by a given supplier beyond a specific target for a given annual year. Carry-under within the context of the Great British Insulation Scheme refers to under-delivery against a given annual target, with a supplier permitted to carry its under-delivery from one annual phase year to another. See separate sections on [Carry-over](#) and [Carry-under](#).
- 2.8 Within the overall delivery target, suppliers will be required to ensure that at least 20% of the annual and overall targets are achieved through delivery of measures to the low-income group. See [low-income eligibility](#) section for more information.

Annual targets

- 2.9 The overall obligation target will be set based on the assumption that households in the general group will collectively contribute £80 million towards insulation measures (equivalent to 10% of the £800 million scheme budget earmarked for this group). For setting the annual targets, the total household contributions

⁵ This figure is from the Great British Insulation Scheme Consultation Stage Impact Assessment [Design of the Energy Company Obligation \(ECO\): 2023-2026 - GOV.UK \(www.gov.uk\)](#). The Government's Response to the consultation states that the Phase A scheme target is likely to be no higher than £8,550,000 in notional annual bill savings. This remains the case.

assumed are £10.4 million in 2023/24 and £34.8m in each of 2024/25 and 2025/26, in line with the annual scheme budgets.

- 2.10 Ofgem will be required to set individual supplier targets each year based on market share using the same data points as for ECO4. Suppliers will be required to meet these annual targets through promotion of sufficient measures completed within year, with accommodations being made for carry-over and carry-under. (See sections below on [Carry-over](#) and [Carry-under](#).)
- 2.11 Progress towards annual targets will be tracked using notified measures, and Ofgem will consider whether any compliance action is appropriate at annual points.

Proposed administrative approach

- 2.12 We propose to calculate and confirm obligations to suppliers in the same way as we do currently for ECO4. The Great British Insulation Scheme will use the same obligation thresholds and the same phase beginning and end dates as ECO4 (with the potential exception of phase A where the exact commencement date is to be confirmed). Therefore, a supplier that is obligated under ECO4 will also have an obligation under the Great British Insulation Scheme. Under ECO4, suppliers are required to notify Ofgem with their customer accounts and supply volume data by 1 February each year.
- 2.13 For Phase A obligation setting, we will use data notified to Ofgem for ECO4 Phase 2 obligation setting. Ofgem will notify suppliers of their Phase A obligation within six weeks from the commencement date of the ECO4A Order (the anticipated name for the regulations governing the Great British Insulation Scheme) and supplier obligations for Phases B and C by 7 March.
- 2.14 Suppliers will be required to routinely notify us of completed measures by the end of the month following the month the measure was completed within. The exception to this is for measures that have been completed on or before 31 December 2023. These measures can be notified on or before 31 January 2024. See the Delivery and Administration section below for further details relating to this.

Monitoring against targets

- 2.15 We will initially use notification of measures and also any provisionally approved measures as appropriate to monitor the progress and likely achievement of all obligated suppliers' annual targets. Where we have concerns that a supplier is not on track to achieve their annual target, we will engage with them more closely and, if appropriate, take compliance action following conclusion of that year.

- 2.16 We will not be able to provide confirmation to a supplier that they have met their annual or overall target until after the full scheme has ended, and it will be the responsibility of each supplier to both manage and track their progress of completed or transferred measures having accounted for any traded measures to ensure they achieve their targets.
- 2.17 Determination of whether suppliers have achieved each of the annual targets and overall targets will be made at the end of the scheme before December 2026. Should a supplier fail to meet their targets we will refer the matter to our Enforcement team for consideration, in line with our Enforcement Guidelines⁶.

Questions

Q1. Do you agree with our proposed approach to monitoring progress against annual phase targets? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Early Delivery

- 2.18 The Great British Insulation Scheme legislation will recognise that there is a period in the scheme where the legislation is not in force. Eligible measures that are completed on or after 30 March 2023 and before the ECO4A Order commences will be identified as early delivery measures. For ease, we are calling measures delivered during the gap ‘the Great British Insulation Scheme Early Delivery.’
- 2.19 The Great British Insulation Scheme Early Delivery must be installed in compliance with the scheme rules and to be awarded partial project scores that were created for ECO4, and for this scheme we will be referring to it as “scores”.

Proposed administration approach

- 2.20 Suppliers can deliver Great British Insulation Scheme measures from 30 March 2023 and have them count towards the Great British Insulation Scheme obligation.
- 2.21 We will publish draft guidance for the Great British Insulation Scheme to provide an indication of our expected administration. Please note that our draft guidance is

⁶ See Ofgem enforcement guidelines on our website:
<https://www.ofgem.gov.uk/publications/enforcement-guidelines>

subject to change until the legislation comes into force. Where a supplier follows the draft guidance, they will be carrying out activities at their own risk. We may reject measures where they do not comply with the final legislation.

- 2.22 The Great British Insulation Scheme Early Delivery measures will count towards any minimum delivery targets and caps under the scheme.
- 2.23 The Great British Insulation Scheme early delivery of measures cannot be formally notified until the commencement of the ECO4A Order. If by 31 January 2024 a digital system is not available for measure notification, we will explore other ways to accept notifications from obligated suppliers. Suppliers have until 31 January 2024 to notify measures completed on or from 30 March 2023 till until 31 December 2023.
- 2.24 Where a supplier is unable to notify a measure by 31 January 2024, they will have the option to apply for an extension to the notification deadline. The extension process will work the same way as it does for ECO4. Suppliers can apply to us for an extension to the notification deadline for a completed measure. The application must be in writing and must explain why the extension is being requested. The reason should be supported by evidence. Information on notifications can be found in chapter 6.

The above changes are set out in the draft legislation for the scheme (the ECO4A Order) and we do not have administrative discretion, so we are not consulting on this aspect.

Carry-over

- 2.25 Under ECO4, if a supplier had achieved savings that exceeded its ECO3 obligations, the supplier could apply to credit these excess measures towards its ECO4 obligations, providing certain criteria were met. The Great British Insulation Scheme Carry-over operates differently, as no analogous scheme precedes it and therefore there is no carry-over permissible from another scheme into the Great British Insulation scheme.
- 2.26 In the Great British Insulation Scheme, the term 'carry-over' refers to annual bill savings delivered within scheme by a given supplier beyond a specific target for a given year. Carry-over therefore can only apply to annual bill savings delivered in Phase A or Phase B. Carry-over is unlimited in each of these two years, allowing suppliers the option to over-deliver on their annual targets in Phase A and/or Phase B. Excess annual bill savings would then contribute to Phase B and C targets, as appropriate.

Sub-obligations

2.27 The low-income minimum requirement is the only sub-obligation in the Great British Insulation Scheme. At least 20% of each annual target must comprise annual bill savings delivered to low-income group households. Delivery beyond the low-income minimum in Phase A can count towards the minima in Phase B and C. Delivery beyond the minimum in Phase B can count towards the Phase C minimum.

Measures

2.28 There are no measure-specific requirements for the Great British Insulation Scheme Carry-over. Provided all other relevant conditions are met, all measure types, including both primary and secondary measures, can be carried over to the subsequent target year.

Caps

2.29 There are two caps in the scheme: Great British Insulation Scheme Flex cap (Local Authority (LA) and Supplier Flex cap) and the Innovation Measure (IM) cap.

2.30 We have consulted on the LA and Supplier Flex separately and therefore we have not consulted on these within this document. You can access the LA Flex and Supplier Flex consultation via our website⁷.

2.31 The LA and Supplier Flex cap ('the 80% cap') permits up to 80% of a supplier's low-income sub-obligation for a given annual target to comprise annual bill savings delivered via LA or Supplier Flex. Any LA and Supplier Flex amount carried over to a subsequent phase will count to the low-income sub-obligation in that phase where the 80% cap is not exceeded. Where any of the carried over amount exceeds the 80% cap, this amount will still count to the low-income group, however, separate to this amount, the supplier must deliver 4% of the total annual obligation in each Phase to non-Flex low-income group households. Any carried over LA and Supplier Flex amount above the 80% cap, cannot contribute to the 4% low-income non-Flex group (this 4% is the remainder of the 20% low-income sub-obligation less the 80% cap).

2.32 The IM cap prevents more than 2% of a supplier's total obligation comprising IMs with the associated IM uplift (either 25% or 45%).⁸ However, only IMs delivered to

⁷ See our website: <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

⁸ The uplift awardable to an IM is determined following a consensus recommendation from the TAP and approval under the NMAP Innovation Pathway.

the low-income group can receive an IM uplift. The IM cap applies at the scheme rather than annual target level, therefore suppliers may fill the cap in Phase A, regardless of whether this is filled by score that is carried over or not. Suppliers can deliver IMs beyond the IM cap, however the IM uplift will not apply to these.

Proposed administrative approach

2.33 Suppliers do not need to notify Ofgem of their intentions to carry measures over to a following target year. This will be calculated at the end of the scheme as part of final determination. Suppliers will be made aware of their progress towards their obligations, sub-obligations and caps via standard periodical information provision from Ofgem on measure notifications and approvals. Measure data will be provisional and high level for the first part of the scheme, until full functionality of the Great British Insulation Scheme Register and associated systems.

Carry-under

2.34 In the Great British Insulation Scheme, carry-under refers to under-delivery against a given annual target, with a supplier permitted to carry its under-delivery from one annual phase to another. This is limited to 10% of the annual target in phases A and B.

Sub-obligation

2.35 As with each annual target, the low-income sub-obligation in the Great British Insulation Scheme can also be carried under by up to 10% of the total low-income sub-obligation in each of target phases A and B.

Caps

2.36 Caps are set at maximums rather than minimums, therefore suppliers can choose to deliver in a way that does not contribute to any cap in a given target.

Measures

2.37 There are no measure-specific requirements for the Great British Insulation Scheme Carry-under.

Proposed administrative approach

2.38 In all cases of under-delivery, in the following phase the remaining target from the previous phase will need to be hit before delivery starts counting towards that phase. Suppliers will need to continuously monitor the delivery of previous phases to ensure any rejections don't cause them to drop below 90% of an annual target.

2.39 Suppliers do not need to notify Ofgem of their intentions to carry-under any obligation to a following target year up to the permitted level. This will be calculated at the end of the scheme as part of final determination. Nevertheless, Ofgem will continuously monitor delivery throughout each phase.

Questions

Q2. Do you agree with our proposed approach for administering Carry-over? If you disagree, please provide alternative suggestions, including any evidence, to support your response

Q3. Do you agree with our proposed approach for administering Carry-under? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

3. Homes and Household Eligibility

Section summary

There will be two eligibility groups, general eligibility and low-income. This section summarises these and they are both set out in further detail in separate sections below. The General Eligibility group which is wider than for ECO4 and enables measures to be installed in private residential properties. Similar to the ECO4 HTHG (Help To Heat Group), the Great British Insulation Scheme has a low-income eligibility group to ensure the scheme provides support to those most in need.

- 3.1 The Great British Insulation Scheme has been designed to offer more support to a broader group of households, and also more support for the most vulnerable households. To achieve this, scheme eligibility has been divided into two main groups, which are:
- General eligibility
 - 'Low-income' group - similar to the Help to Heat group supported by ECO4
- 3.2 At least 20% of each supplier's annual phase target will be required to be delivered on measures installed to households in the low-income group.

Proposed administrative approach

- 3.3 Further details relating to these two eligibility groups and our proposed administrative approach are set out in in the Eligibility Requirements section, below.

General Eligibility

- 3.4 The general eligibility group will enable a wider pool of households to benefit from support. Eligible households will be those that fall into defined private premises Council Tax bands ranges, and defined [Standard Assessment Procedure \(SAP\) ranges, as set out in Table 1](#), below. All eligible social housing will be treated through the low-income group rather than the general eligibility group. (See section 9, below, on Social housing.)

Table 1: Summary of general eligibility: Private domestic households (i.e. owner occupiers and private rented) Council Tax valuation and SAP bands

Nation / Eligibility requirement	England	Wales	Scotland
Council Tax valuation bands	Bands A, B, C or D	Bands A, B, C, D or E	Bands A, B, C, D or E
SAP band for Owner-occupied (Heating control measures are not applicable)	Bands D, E, F or G owner occupied	D, E, F or G owner-occupied	D, E, F or G owner-occupied
SAP band for Private rented	Bands D, E, F or G For Bands F and G a property must be registered on the PRS Exemptions register.	Bands D, E, F or G. For Bands F and G a property must be registered on the PRS Exemptions register	Band D or E

Proposed administrative approach

- 3.5 Our approach to ensuring that properties for the general eligibility requirement are owner-occupied or private rented will be similar to the confirmation of tenure approach for ECO4. (See our [ECO4 delivery guidance](#)⁹, from paragraph 3.6 onwards relating to the private requirement and figure 1: Private domestic premises flow chart for further details.)
- 3.6 The starting SAP band of properties is a feature used to define eligibility of some target households groups within ECO4. Therefore we propose to follow the same administrative approach for the Great British Insulation Scheme.
- 3.7 In relation to verifying Council Tax bands, it will be the responsibility of suppliers to ensure that they can provide evidence that notified measures have been installed in eligible properties and will be asked to declare this information during the notification process.
- 3.8 We also propose to include a field to capture the council tax band for the property notified in the scheme register.
- 3.9 We propose that suppliers should, if asked, be able to provide us with a council tax bill, addressed to the customer at the address which is receiving the measures. A

⁹ [Energy Company Obligation \(ECO4\) Guidance: Delivery | Ofgem](#)

property's council tax band can be checked on either the Valuation Office Agency's 'Check your Council Tax band' website¹⁰(for England and Wales), or the Scottish Assessors Association website¹¹. We may ask to see the council tax bill as part of routine compliance checks or as part of a full audit.

Questions

Q4. Do you agree or disagree with our proposed approach to verification of appropriate Council Tax bands for the general household eligibility group? Please provide further information and evidence in relation to your response.

Low-income eligibility

Eligibility requirements

- 3.10 The Great British Insulation Scheme will also target a low-income group which mirrors the eligibility criteria for the Help to Heat Group (HTHG) within ECO4, targeting low-income and/or vulnerable households.
- 3.11 Both the general eligibility and low-income groups are then further divided into whether they are owner-occupied or privately rented, with the low-income group further including social housing eligibility too. The group and sub-group will then influence which measures are eligible.
- 3.12 PRS households in EPC bands F and G in Scotland will be excluded to ensure consistency with the situation in England and Wales.

Low-income minimum requirement

- 3.13 There will be a requirement within the Great British Insulation Scheme that at least 20% of each supplier's annual target should be delivered to the low-income group. This allows for the further 80% to be delivered solely to the general eligibility group or a mix of both groups. Delivery to this 80% will be unconstrained giving freedom to suppliers to choose their own mix.

Proposed administrative approach

- 3.14 Similar to ECO4, SAP bands will be assessed through the TrustMark API against data from the retrofit assessment and suppliers will report their Great British

¹⁰ [Check your Council Tax band - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹¹ [Scottish Assessors – Scottish Assessors Association website \(saa.gov.uk\)](http://saa.gov.uk)

Insulation Scheme low-income group delivery / minimum requirement, including Council Tax information, to Ofgem by submitting supplier notifications to the register.

Private rented homes

Section summary

This section outlines how the Great British Insulation Scheme will support eligible Private Rented Sector (PRS) homes in both the low-income group and in the general group, including which measures households in each group will be eligible for under the scheme.

- 3.15 As with ECO4, the Great British Insulation Scheme will support eligible PRS households in the low-income group, (see paragraph 5.1 for more information on low-income eligibility), although the scheme will also support households in the general group. (See paragraph 4.4 onwards for more information on general group eligibility)
- 3.16 Given that landlords in England and Wales are already required to improve homes to a SAP band E, up to a spend cap of £3,500, PRS households in SAP bands F and G are excluded from the scheme, with limited exceptions¹². The same Great British Insulation Scheme criteria will apply for Scotland.
- 3.17 PRS households in the general eligibility group, with a SAP band D or E, as well as band F to G exceptions, as noted above, will be able to receive any eligible insulation measure, except for loft or cavity wall insulation. They will therefore be eligible for solid wall, pitched roof, flat roof, under floor, solid floor, park home and room-in-roof insulation. PRS households in the general eligibility group will not be able to receive secondary heating controls.

¹² Landlords with F and G EPC-rated PRS homes will only be eligible for the Great British Insulation Scheme support if either of the following two conditions apply:

- (i) if the property has registered a valid exemption, or
- (ii) if the property is not in scope of the PRS regulations because it is not legally required to have an EPC or it is not let on one of the relevant tenancy types (shorthold assured or regulated tenancy, or on certain types of domestic agricultural tenancies).

3.18 PRS households in the low-income group, with a SAP band D or E, as well as band F to G exceptions, as noted above, will be eligible for all insulation measures but not secondary heating controls.

Proposed administrative approach

3.19 The tenure type and eligibility group of the property should be notified to Ofgem in the measure notification template.

3.20 We will check that the measures notified are eligible with the tenure field. Where they are not eligible, we will reject those measures.

3.21 We will require suppliers to obtain a declaration from the occupants of the property to confirm via an eligibility form that the tenure type is PRS and falls either within the low-income group or general group.

Questions

Q5. Do you agree with our proposed administration of the PRS under the Great British Insulation Scheme? Please provide suggestions for alternative evidence if you disagree with our proposed approach.

Q6. Do you agree with our proposal for the Great British Insulation Scheme to require suppliers to obtain a declaration from occupants to evidence whether the PRS household falls within the low-income or general group? Please provide suggestions for alternative evidence if you disagree with our proposed approach.

Social housing

Section summary

This section outlines how the Great British Insulation Scheme supports low-income group households living in social housing, including the measures these properties are eligible to receive under the scheme. This section is not relevant to the general group. Social housing is a criteria under the ECO4 'Help to Heat Group', therefore these households automatically fall only within the low-income group.

- 3.22 The Great British Insulation Scheme will offer support to social housing tenants. Due to social housing criteria, these households fall within the low-income group.
- 3.23 Great British Insulation Scheme social housing households in SAP bands E, F and G will be eligible to receive any single insulation measure but will not be eligible for heating controls.
- 3.24 Band D social housing households will only be eligible for a single insulation measure classified as an [Innovation Measure](#), in line with eligible measure types under the Great British Insulation Scheme.

Proposed administrative approach

- 3.25 For social housing households, the tenure type and eligibility group of the property should be notified in the Great British Insulation Scheme measure notification template.
- 3.26 We will check that the measures notified are eligible with the tenure field. Where they are not eligible, we will reject those measures.
- 3.27 To evidence whether a property is social housing and that it is let below the market rate, as with ECO4, the scheme will require suppliers to obtain a declaration from the social landlord of the property confirming the tenure type is social housing and that the property is let below the market rate. Social landlords will be required to complete an eligibility form to evidence this.
- 3.28 We will also require social landlords to obtain a declaration from the occupants of the property to confirm via an eligibility form that the tenure type is social housing and therefore falls within the low-income group.
- 3.29 We aim to follow the same administration processes for social housing as we do for ECO4, although the forms will be separate versions, specifically relating to the Great British Insulation Scheme.

4. Off-Gas Rural Delivery

Section summary

Given the complexities of delivering measures to rural areas ECO4 introduced a rural uplift for off-gas properties in recognition that rural properties faced increased costs of delivery. 'Uplifts' may be applied to the cost savings which increases the value when determining a score. These are provided to encourage delivery of specific measures or treatment of certain properties. This section explains the change in approach to the rural uplift from ECO4.

- 4.1 Under ECO4 a 35% uplift is applied to off-gas rural properties in Scotland and Wales, but no uplift is applied to equivalent homes in England due to the availability of the Home Upgrade Grant. During the ECO4 notification process, the Output Area code is required for rural homes, with a N/A being recorded for non-rural homes. The ECO4 guidance provides various recommendations on how to determine a home's rurality, for instance through the ONS Postcode Directory, but any equivalent system can be used. The property's eligibility to class as off-gas is evidenced through the Pre-Installation Heating Checklist.
- 4.2 An off-gas rural uplift will be used in the Great British Insulation Scheme. It will be a 20% uplift, applying to all measures, and will only apply to the low-income group in Scotland and Wales. As with ECO4 the uplift will not apply to properties in England.

Proposed administrative approach

- 4.3 Within ECO4 the off-gas element is evidenced through the Pre-Installation Heating Checklist. Although the relevant form will be updated for the Great British Insulation Scheme we propose keeping the same administration as for ECO4. For more information on forms see section 9 Forms.
- 4.4 Given the only change within the off-gas rural uplift from ECO4 is the percentage the uplift is awarded we propose to administer this in the same way as we do for ECO4, and therefore will not be consulting on this aspect.

5. In-fill

Section summary

This section describes the In-fill process within the Great British Insulation Scheme and explains how non-eligible homes can receive treatment.

- 5.1 In-fill allows for homes that would not normally be eligible to be treated under ECO to receive measures.
- 5.2 In-fill has been a mechanism within several previous ECO schemes. Flats receiving in-fill measures must be in the same block as the qualifying household and houses must be in the same street. The Government intends for the Great British Insulation Scheme in-fill to follow the same criteria as ECO4 as detailed below.

Flats

- 5.3 Flats can be treated with a ratio of 1:1 meaning that for every Great British Insulation Scheme eligible flat, one flat can be treated as an in-fill flat, receiving either solid wall insulation or cavity wall insulation. The in-fill measure installed must be the same type as in the Great British Insulation Scheme qualifying property. If a block of flats has 50% or more Great British Insulation Scheme eligible flats then the entire block could receive Great British Insulation Scheme measures. As with ECO4, in-fill flats can be owner-occupied, privately rented or social housing and can be within a starting SAP band of A-G.

Houses

- 5.4 Houses can be treated with a ratio of 1:3 meaning that for every three houses eligible under the Great British Insulation Scheme one house can be treated as in-fill, but will only be eligible for solid wall insulation. All houses in the 3:1 ratio must be on the same street. As with ECO4, in-fill houses can be owner occupied, privately rented or social housing but must be within a starting SAP band of D-G.
- 5.5 The Great British Insulation Scheme qualifying property can be from either the general eligibility or low-income groups. The in-fill measure must be installed within three months of the Great British Insulation Scheme qualifying measure, or latest qualifying measure installed within a house.

Proposed administrative approach

- 5.6 As the criteria for Great British Insulation Scheme in-fill will be the same as for ECO4 with only the allowable measures differing in the Great British Insulation

Scheme, we propose to administer Great British Insulation Scheme in-fill in the same way as we do for ECO4, and therefore will not be consulting on this aspect.

6. Interaction Between the Great British Insulation Scheme and Other Schemes

Section summary

This section addresses the interaction between the Great British Insulation Scheme and other existing government schemes and grants including ECO4.

- 6.1 It is proposed that funding for measures delivered under the Great British Insulation Scheme should not be blended with funding from other government schemes or grants, in order to avoid duplication of subsidy.
- 6.2 In contrast to other existing government schemes, such as ECO4 that aim to treat a whole house, the Great British Insulation Scheme is expected to focus mostly on single measures to achieve bill savings in as many homes as possible, therefore we only expect these measures to receive funding from one government scheme.
- 6.3 Any measures outside of the Great British Insulation Scheme delivered to the same property cannot be installed after the pre-retrofit RdSAP assessment ¹³and before the post-retrofit RdSAP assessment (both of these are required for a Great British Insulation Scheme measure). If measures are delivered prior to the pre-retrofit RdSAP assessment, the property band will still need to meet the Great British Insulation Scheme requirements to qualify for support.
- 6.4 If a household is eligible for support under another scheme having had the Great British Insulation Scheme support, they may still receive it, including under ECO4, provided the household still meets relevant scheme specific requirements. However, such households will not be able to receive further measures under the Great British Insulation Scheme.
- 6.5 This requirement includes, but is not limited to, the following schemes
- The Home Upgrade Grant (HUG)
 - The Green Homes Grant Local Authority Delivery (GHG LAD)
 - The Boiler Upgrade Scheme (BUS)

¹³ For existing dwellings, a simplified version of SAP called Reduced Data SAP (RdSAP) is used to assess their energy performance. An RdSAP assessment will use a set of assumptions about the dwelling based on conventions and requirements at the time it was constructed.

- The Warm Home Discount (WHD)
- The Social Housing Decarbonisation Fund (SHDF)

6.6 Funding between the schemes listed above and the Great British Insulation Scheme cannot be blended.

Questions

Q7. Do you have any thoughts on how potential interaction with other schemes can be monitored? For example, including a customer/landlord declaration form?

Q8. Are there any additional issues you wish to raise regarding interactions between ECO4 and the Great British Insulation Scheme and/or with other existing grant schemes?

7. Eligible Measures

Section summary

This section outlines the proposed energy efficiency measure types that are eligible for installation under the Great British Insulation Scheme.

Insulation Measures

- 7.1 As with other energy efficiency schemes and grants, the Great British Insulation Scheme will continue a 'fabric-first' approach. As the scheme aims to promptly target a large volume of homes, the Department for Energy Security and Net Zero proposes delivering predominantly insulation to ensure support reaches a broader spectrum of people who are at risk of struggling to pay their energy bills.
- 7.2 Under the Great British Insulation Scheme both the low-income group and the general group will be eligible for the following insulation measures.
- Cavity wall insulation (insulation between the leaves of exterior facing walls and /or party walls)
 - Solid wall insulation (external or internal insulation of a solid wall)
 - External or internal insulation of a cavity wall
 - Loft insulation
 - Pitched roof insulation
 - Flat roof insulation
 - Under floor insulation
 - Solid floor insulation
 - Park home insulation (floor, wall and ceiling)
 - Room-in-roof insulation

Heating Controls

- 7.3 The list of eligible heating controls in the Great British Insulation Scheme is as follows:
- Thermostatic radiator valves
 - Boiler programmers and room thermostat

Proposed administrative approach

- 7.4 Heating controls are only eligible in the Great British Insulation Scheme when installed in owner-occupied premises in the low-income group.
- 7.5 Furthermore, a heating control may only be installed as a secondary heating measure, meaning an insulation measure must have already been installed as an eligible scheme measure in the same property, referred to as the primary insulation measure.
- 7.6 Multiple secondary heating controls may be installed in one property, supported by a single primary insulation measure
- 7.7 To be eligible, a secondary heating measure must be completed within 3 months from the completion of the primary insulation measure. Heating controls installed beyond this deadline will not be eligible. No extensions to this deadline are available.
- 7.8 We propose to follow the same administrative approach to secondary heating measures as in ECO3. We will not approve any secondary heating measures in a property until the associated primary insulation measure has been approved first. Suppliers will need to identify the associated primary insulation measure when notifying a secondary heating measure. Secondary heating measures must be promoted by the same supplier and notified to the same license as the primary insulation measure.

Questions

**Q9. Do you agree with our proposed approach towards heating controls?
If you disagree, please provide further comment in your response,
and suggest any alternatives.**

Innovation

- 7.9 Under ECO4 suppliers can apply for a product that offers an improvement over comparable measures to be approved as an innovation measure for which, upon approval, an IM uplift is awarded.
- 7.10 Products and measures approved as an IM under ECO will remain deliverable under the Great British Insulation Scheme.
- Where IM eligibility requirements are met an uplift will be awarded automatically upon notification.
 - Eligibility requirements for IM uplift award are delivered to a household within the low-income group and/or delivery to social housing band D.
- 7.11 An approved IM will be deliverable to households within the general group, but will not accrue an uplift upon notification, as the eligibility requirements would not be met.
- 7.12 IM uplifts carried over from ECO3 or awarded under the New Measures and Products (NMAP) innovation pathway¹⁴ under ECO4 will be retained under the Great British Insulation Scheme. Under this approach notification of a standard innovation measure will accrue a 25% uplift and notification of a substantial innovation measure will accrue a 45% uplift.
- 7.13 Under the Great British Insulation Scheme a 5% uplift will not be awarded to suppliers sponsoring approved ECO4 IM applications.
- 7.14 The delivery of IM will have a general cap, set as 10% of the low income minimum obligation of 20% of the Great British Insulation Scheme, which would be equivalent to 2% of overall delivery, provided it's delivered to low-income households.

Proposed administrative approach

- 7.15 As the criteria for Great British Insulation Scheme IM will be the same as for ECO4, with only the allowable measures differing in the Great British Insulation Scheme, we propose to administer Great British Insulation Scheme IM notification and uplift award, in the same way as we do for ECO4, and therefore will not be consulting on this aspect.

¹⁴ Aimed at incentivising and supporting delivery of products that offer improvement(s) over comparable measures deliverable in the GB market.

8. Scoring

Section summary

This section addresses the proposed methodology for determining annual bill savings for measures installed under the Great British Insulation Scheme. It also addresses the proposal to use RdSAP assessments to evidence scores for the Great British Insulation Scheme measures and the uplifts available to low-income households under the Great British Insulation Scheme.

Overarching Scoring Framework

- 8.1 The overarching scoring framework refers to the methodology for determining the annual bill savings associated with energy efficiency measures installed under the scheme.
- 8.2 The Government's response to the Great British Insulation Scheme consultation sets out the decision to adopt the current ECO4 partial project scores as the overarching scoring framework for the Scheme. Government also set out its decision to retain the 10% correction factor which is applied to all partial project scores (PPS).
- 8.3 The ECO4 partial project scores represent the annual cost saving achieved by a measure when installed in a domestic premises. Under this approach, the base score for a given installation is selected from a score matrix using the measure type along with the home's intermediate SAP band and floor area segment. The main heat source of the home is also required in the case of secondary measures. Calculations are applied to the base score if less than 67% of the property is treated by the measure or if an uplift applies. An uplift is a % multiplier added to the score of a measure under specific circumstances.¹⁵
- 8.4 We will publish a separate Great British Insulation Scheme score matrix, containing only ECO4 partial project scores for those measures which are eligible in the scheme. These measures will have the same scores as their ECO4 counterparts

¹⁵ Further information on the ECO partial project scores can be found in Chapter 6 of our ECO4 Guidance: Delivery <https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery>

Evidencing Scores

- 8.5 As set out in the previous section the Great British Insulation Scheme will adopt the ECO4 partial project scores which are based on the measure type installed, the floor area of the premises, and the intermediate SAP band of the premises prior to installation. Additionally, as set out in [section 6 \(Quality and Standards\)](#), the Great British Insulation Scheme retrofits are required to be delivered in accordance with PAS (Publicly Available Specification) 2035¹⁶. As part of this framework, a pre-retrofit RdSAP assessment must be carried out and lodged with TrustMark. A post-retrofit RdSAP assessment is also a requirement of the Scheme. The Government's response sets out their decision that the RdSAP assessments will act as evidence of the score for a measure.
- 8.6 As with ECO4, we propose that the measure type, floor area and intermediate SAP band are notified to us following the installation of a measure. We will verify this information against the RdSAP assessments held by TrustMark as part of our processing.
- 8.7 We propose to publish forms for the collection of additional evidence in relation to scores and eligibility. These will follow a similar approach to the project forms provided for ECO4,¹⁷ however the number of forms will be reduced due to the simpler nature of the scheme.

Questions

Q10. Do you have any comments on our proposal to collect evidence for scores using notifications and forms and to verify key details against the pre-retrofit RdSAP assessment? If so please provide your comments.

¹⁶ PAS 2030 is a Publicly Available Specification for the installation of energy efficiency measures in existing buildings which was first introduced for government energy efficiency schemes in 2013. PAS 2035 and 2030 combine to ensure a whole house, and whole project, approach to managing the installation process and providing services to the customer before, during and after installation is taken.

¹⁷ <https://www.ofgem.gov.uk/publications/eco4-project-forms-and-tables>

Uplifts

- 8.8 In certain circumstances, 'uplifts' may be applied to the cost savings which increases the value when determining a score. These are provided to encourage delivery of specific measures or treatment of certain properties. Under the Great British Insulation Scheme, the three Government types of uplift are:
- Off-gas rural uplift
 - Innovation measure uplift
 - Floor area uplifts
- 8.9 The rural off-gas uplift will apply to low-income properties in Scotland and Wales. Properties that are eligible will be supported with a 20% uplift to the score given to each measure. The uplift will apply to all measure types and, in a manner consistent with ECO4, will only apply to off-gas grid rural properties.
- 8.10 There will be a 25% innovation measure uplift awarded for innovation measures that demonstrate a reasonable improvement against their commonly available standard counterparts, and a 45% uplift for innovation measures that demonstrate a substantial improvement across a range of criteria (including, but not limited to, increase in annual cost savings, decreased installation costs, and improvement in overall environmental impact). The uplift that applies will be determined as part of the ECO4 innovation measure application process.
- 8.11 Both eligibility groups can receive innovation measures, however only the low-income group qualifies for the uplift. There is a cap delivery of innovation measures receiving uplifts at 10% of the low-income minimum requirement of 20%. This means that a maximum of 2% of each supplier's obligation can comprise innovation measures receiving an uplift. Innovation measures can be delivered to low-income households beyond this; however, these will not attract an uplift.
- 8.12 Floor area uplifts apply to any scores awarded to measures installed in properties in the smallest two floor area segments. The uplift is 20% for the 0-72 m² segment and 10% for the 73-97 m² segment. These uplifts are already applied to all relevant scores in the published matrix. Suppliers do not need to calculate this uplift or submit any additional notification. The uplifts will be automatically included in the scores awarded.
- 8.13 There is no limit to the number of uplifts that can be applied to a property. When multiple uplifts are available to a property, the uplifts are only applied to the base score (pre-uplift). Therefore, each uplift increases only the base score, rather than an uplifted score.

- 8.14 There is no limit to the number of uplifts that can be applied to a property. The off-gas rural uplift and innovation measure uplift apply on top of the floor area uplift – they are applied directly to scores in the published matrix (following a ‘percentage of property treated’ calculation if relevant). However, where a measure attracts both the off-gas rural and innovation measure uplifts, these do not compound – they are applied separately to the matrix score and the results of the uplifts are combined afterwards. Example calculations can be found in Chapter 6 of the draft Great British Insulation Scheme Guidance: Delivery¹⁸.
- 8.15 Uplifts can be applied to measures installed in in-fill properties under the Great British Insulation Scheme.

Proposed Administrative Approach

- 8.16 As the criteria for the two Great British Insulation Scheme uplifts will largely be the same as for ECO4, with only the eligibility group and percentage uplift amount differing, we propose to administer the Great British Insulation Scheme uplifts in the same way as we do for ECO4. The template suppliers use to notify measures to us will include fields indicating whether the off-gas rural and/or innovation measure uplifts apply. Where they apply, the register will calculate the value of the uplift(s) and include this automatically when assigning scores to measures. Due to the similarity to ECO4, we are not consulting on this area.

¹⁸ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

9. Delivery & Administration

Section summary

This section covers our proposals for various administrative elements of the Great British Insulation Scheme including notification of measures, caps, extensions, trades and transfers.

Notifications

- 9.1 All measures installed under the Great British Insulation Scheme must be notified to Ofgem. This notification must include all of the details required to establish eligibility of the measure and award the correct score. All Great British Insulation Scheme measures are also required to be lodged in the TrustMark Data Warehouse and details of this lodgement must be included in the notification. Ofgem will publish a notification template and accompanying data dictionary suppliers should use when notifying measures.
- 9.2 All measures completed on or before 31 December 2023 must be notified on or before 31 January 2024.
- 9.3 All other measures must be notified by the end of the month following the month in which it was completed. For example, a measure installed on 7 March 2024 must be notified on or before 30 April 2024.
- 9.4 The same notification extension routes from ECO3 and ECO4 will be available in the Great British Insulation Scheme. An automatic three-month extension may be granted to a number of measures equal to 5% of the measures completed and notified on time within a month,. All measures installed in 2023 will be treated as a single period for determining the Auto-late quota.
- 9.5 Suppliers will also have the option of submitting a notification extension request to Ofgem where delays in a measure’s notification are unexpected and unavoidable.
- 9.6 Ofgem will develop a Great British Insulation Scheme register used for notification and management of measures similar to other ECO schemes. When available, suppliers should submit notification templates to the register. If, a system is not available for measure notification before January 2024, suppliers may need to submit notifications offline. If required, further guidance on how offline measure notification and processing is to take place will follow.
- 9.7 In ECO4, there are separate notification templates for projects and measures, as they exist as separate entities on the ECO4 register. However, for the Great British

Insulation Scheme, we propose to return to only having a measure template as in ECO3, due to the simpler rules of the scheme compared to ECO4 and the limited number of measures to be installed in each property.

Caps

9.8 As mentioned previously in this document, there are two caps in the Great British Insulation Scheme:

- Innovation measures in total are capped at 10% of a supplier's annual low-income obligation.
- Delivery of flex measures contributing to a supplier's low-income minimum requirement is capped at 80%. Once the low-income minimum requirement has been met flex measures may be delivered without constraint.

9.9 Flex measures above the flex cap may not be counted towards the supplier's obligation (unless that measure meets the requirements of another eligibility route), whereas Innovation Measures above the cap will be scored but without the innovation uplift applied.

9.10 We propose to mirror our approach to caps from ECO4. Therefore we propose to administer and enforce these caps at final determination which takes place at the end of the scheme. This means suppliers may temporarily go above caps throughout the scheme without consequence but must be below their caps by the end of the scheme or risk losing the score for measures above caps.

9.11 Where some of a supplier's measures exceed a cap and therefore are to have their scores impacted, we propose the supplier will be given the choice of which relevant measures will be impacted.

Trades

9.12 As in previous schemes, suppliers have the option of trading part or all of their obligations between licences (intra-supplier trading) or to a different supplier (inter-supplier trading).

9.13 Trades in the Great British Insulation Scheme have a deadline for each phase. A trade request for a phase must be submitted by 31 December during that phase. We propose that suppliers will only need to have raised a trade request by the deadline for us to allow a trade. We may assess and approve or reject requests after the deadline, and suppliers may have the opportunity to correct any errors in a request after the deadline, provided the initial request was submitted on time.

- 9.14 A trade request must include the types and amounts of obligations to be traded. We may reject a request if we consider there to be significant risk that the supplier will not be able to deliver their obligation for that phase should the trade go ahead.
- 9.15 As in other ECO schemes, we propose to offer Intra-Supplier Licence Consolidation Trading (ISLCT) during obligation setting for each phase. If a supplier requests this, all of their obligations for that phase will be consolidated onto the supplier’s largest licence.

Transfers

- 9.16 As in previous ECO schemes, suppliers will have the option to transfer their completed measures between licenses (intra-supplier transfer) or to a different supplier (inter-supplier transfer).
- 9.17 A transfer request must be submitted (by both suppliers where relevant) on or before 30 June 2026.
- 9.18 Any measures that are linked via the in-fill mechanism or the primary insulation / secondary heating mechanism must be transferred together.
- 9.19 We may reject a transfer request where we believe the participating suppliers may be unable to achieve their obligations following completion of the transfer.
- 9.20 We propose to allow non-approved measures to be included in an intra-supplier transfer. However, to be transferred between suppliers a measure must either be approved or rejected.

Questions

Q11. Do you agree with our proposal to only have one notification type – measures – instead of having projects and measures separate as in ECO4? If not, please expand on why.

Q12. Do you agree with our proposals for the administration of caps? If not, please expand on why.

Q13. Do you agree with our proposals for the administration of trades? If not, please expand on why.

Q14. Do you agree with our proposals for the administration of transfers? If not, please expand on why.

10. Quality & Standards

Section summary

This section outlines the approach of the Great British Insulation Scheme for guarantees, installation standards and smart meters for quality assurance and consumer protection, including requirements for measures according to PAS, and where applicable, measures to be promoted through TrustMark’s quality assurance framework.

Guarantees

- 10.1 Guarantee requirements and standards will be mandated by TrustMark via their registration and compliance of the quality assurance framework.
- 10.2 Any measure lodged with TrustMark that does not meet relevant guarantee requirements enforced via TrustMark, will not be considered a qualifying Great British Insulation Scheme measure.

Installation Standards

- 10.3 As noted in the government’s Great British Insulation Scheme Consultation regarding the standards when measures are installed, they will need guarantees which will be overseen mostly by Trustmark.
- 10.4 There will be a requirement for all measures installed under the Great British Insulation Scheme to meet the most up-to-date PAS standards, they will be mandated through the TrustMark framework.
- 10.5 Where relevant, any exemption will be evidenced in the same process as ECO4 through the PAS2035. For more information about PAS2035 please visit [TrustMark’s website](#)¹⁹.
- 10.6 Additionally, concerns were raised regarding TrustMark’s Licence Plus MLP’s approach to traditional buildings, as opposed to PAS 2030/2035 which contains specific requirements for these property types. The measures delivered under the Great British Insulation Scheme, including, cavity and loft insulation in low-risk scenarios and heating controls, will be delivered in accordance with the PAS 2030/2035 standard.

¹⁹ [TrustMark & The Delivery of PAS 2035](#)

10.7 This will maintain consistency with other government schemes and ensure that the PAS standards continue to be embedded throughout the energy efficiency supply chain. The Great British Insulation Scheme will continue to explore loft insulation in low-risk scenarios and heating controls, with the possibility to be introduced mid-scheme should this be required.

Smart Meters

10.8 Smart meter advice will continue to be mandatory under the Great British Insulation Scheme. As with ECO4, installers and retrofit coordinators are required to provide advice on the benefits of smart meters under the Great British Insulation Scheme. The decision of accepting a smart meter offer remains with the consumer.

10.9 The smart meter advice will be provided alongside the initial retrofit energy efficiency advice provided to households as required of the Retrofit Advisor under PAS 2035.

10.10 The proposal of Smart Energy GB guidance²⁰ on Smart Meters as released by the Government will help standardise the provision of smart metering advice and make compliance simple for the supply chain.

10.11 In summary, there will not be many changes to this approach and therefore we will not be providing further consultation questions.

²⁰ [About Us - Our essential documents | Smart Energy GB](#)

11. Forms

Section summary

This section covers the proposed approach towards forms used to access the scheme and declare eligibility and measures.

- 11.1 We propose that new forms will be published for accessing the Great British Insulation Scheme. While these will be similar to those in ECO4, we propose to omit certain sections that are no longer relevant under the Great British Insulation Scheme.
- 11.2 The new forms will reflect the respective eligibility and measure differences between ECO4 and the Great British Insulation Scheme.
- 11.3 We expect some small but significant changes between the ECO4 and the Great British Insulation Scheme forms. The Great British Insulation Scheme is based upon measures, rather than projects of measures. As a result, project information will not need to be collected, reducing the number of forms required. Only heating controls listed at paragraph 5.8 are eligible under the scheme this will also be reflected in the new measures form.
- 11.4 As mentioned in [Chapter 6](#), the Government decided not to follow the TrustMark Licence Plus (TMLP) route because of the feedback received from the Great British Insulation Scheme Government consultation. While PAS is to continue under the Great British Insulation Scheme, Trustmark Licence Plus will no longer be part of the scheme. Instead, the Great British Insulation Scheme will take the PAS2035 whole-house approach that includes consideration of measure interactions and individual property characteristics, and this will be reflected in the new measures form.
- 11.5 We propose to reflect the verification of appropriate Council Tax bands for the new general household eligibility group in the eligibility form.

Questions

Q15. Do you agree with our approach to publish new forms for accessing the Great British Insulation Scheme, to collect eligibility information and measure information? If you disagree, please provide further comment in your response, and suggest any alternatives.

12. ECO4 Amendment

Section summary

This section covers our proposed approach to the proposed amendments to the ECO Order 2022. This includes changes to interpretations, qualifying actions and heating measures.

Heating Measures

- 12.1 The legislation will be amended to include the installation of a connection to a district heating system (DHS) that delivers heat generated wholly or partly from mains gas. This amendment will result in changes to the delivery of stage 2 in the off-gas heating hierarchy which will be added in our ECO4 Delivery Guidance. Our ECO4 register will be amended to ensure these measures are eligible.
- 12.2 The ECO4 Delivery Guidance will also be updated to reflect the amendment to the legislation to allow homes with neither an efficient nor inefficient heating system to be eligible for electric storage heaters and electric heating systems.
- 12.3 This also applies to off-gas homes where it is not possible to install measures from the off-gas heating hierarchy, depending on tenure types. As a result, the ECO4 Delivery Guidance, the ECO4 Measures Table and other relevant forms will also be updated to reflect these changes. Specifically in the ECO4 Delivery Guidance, the off-gas heating hierarchy will be amended to include electric storage heaters and electric heating systems where it is not possible to install measures in stages 1 and 2. The updated off-gas heating hierarchy rules will be amended on the ECO register.
- 12.4 Due to the limitations of the current legislation, solar PV cannot be installed in off-gas homes with a pre-existing hydronic heat pump, electric storage heaters or an electric heating system (with a SAP responsiveness of greater than 0.8). However, the legislation will be amended to allow solar PV installations in these instances. We will update the ECO4 Delivery Guidance to reflect that solar PV installations are permitted in off-gas homes. The ECO4 register will also be updated to allow solar PV installations after the date of amendment.

13. General Administration

Section summary:

This chapter covers any general administration that we would like to get feedback on such as the segmentation of the guidance documents we publish for ECO4 and the Great British insulation Scheme.

Segmenting our guidance documents

- 13.1 We have separated out documentation that is solely for a particular audience as we have done for ECO4. The Local Authority Administration guidance is intended to be information only relevant for Local Authorities in a similar way to the Supplier Administration document which is intended to be information only for suppliers. The draft delivery guidance that will be published for this scheme will outline all remaining information for suppliers and the supply chain including the supplier Flex requirements. This section in the delivery guidance talks about the supplier administration of the Flex policy within the scheme and the responsibility that the suppliers have in order to deliver Flex measures.
- 13.2 We are proposing to combine the Local Authority Administration guidance for ECO4 and Great British Insulation scheme.
- 13.3 Currently the supplier Flex requirements are outlined in the delivery guidance for both schemes. An alternative approach would be to segment the guidance documents by policy. We are exploring the idea of adding supplier Flex requirement to the LA Flex guidance so that, for example, all information for local authorities and the suppliers is within a single Flex guidance document. Similar could be done for other policy areas as well, however our preferred approach is to segment by audience to assist with ease of understanding.

Questions

- Q16. For ECO4 and the Great British Insulation Scheme, do you agree with our approach of having a single guidance document for local authorities? If you agree or disagree, please provide your comments in the response, and suggest any alternatives.**
- Q17. Do you have any further comments on the structure of our guidance documents? If so, please provide your comments in the response.**
- Q18. Are there any areas where you think further guidance would be useful?**
- Q19. Do you have any further comments on our proposed administration for the Great British Insulation Scheme?**

Appendix 1 – List of Questions

- Q1. Do you agree with our proposed approach to monitoring progress against annual phase targets? If you disagree, please provide alternative suggestions, including any evidence, to support your response.**
- Q2. Do you agree with our proposed approach for administering Carry-over? If you disagree, please provide alternative suggestions, including any evidence, to support your response.**
- Q3. Do you agree with our proposed approach for administering Carry-under? If you disagree, please provide alternative suggestions, including any evidence, to support your response.**
- Q4. Do you agree or disagree with our proposed approach to verification of appropriate Council Tax bands for the general household eligibility group? Please provide further information and evidence in relation to your response.**
- Q5. Do you agree with our proposed administration of the PRS under the Great British Insulation Scheme? Please provide suggestions for alternative evidence if you disagree with our proposed approach.**
- Q6. Do you agree with our proposal for the Great British Insulation Scheme to require suppliers to obtain a declaration from occupants to evidence whether the PRS household falls within the low-income or general group? Please provide suggestions for alternative evidence if you disagree with our proposed approach.**
- Q7. Do you have any thoughts on how potential interaction with other schemes can be monitored? For example, including a customer/landlord declaration form?**
- Q8. Are there any additional issues you wish to raise regarding interactions between ECO4 and the Great British Insulation Scheme and/or with other existing grant schemes?**
- Q9. Do you agree with our proposed approach towards heating controls? If you disagree, please provide further comment in your response, and suggest any alternatives.**
- Q10. Do you have any comments on our proposal to collect evidence for scores using notifications and forms and to verify key details against the pre-retrofit RdSAP assessment? If so please provide your comments.**

- Q11. Do you agree with our proposal to only have one notification type – measures – instead of having projects and measures separate as in ECO4? If not, please expand on why.**
- Q12. Do you agree with our proposals for the administration of caps? If not, please expand on why.**
- Q13. Do you agree with our proposals for the administration of trades? If not, please expand on why.**
- Q14. Do you agree with our proposals for the administration of transfers? If not, please expand on why.**
- Q15. Do you agree with our approach to publish new forms for accessing the Great British Insulation Scheme, to collect eligibility information and measure information? If you disagree, please provide further comment in your response, and suggest any alternatives.**
- Q16. For ECO4 and the Great British Insulation Scheme, do you agree with our approach of having a single guidance document for local authorities? If you agree or disagree, please provide your comments in the response, and suggest any alternatives.**
- Q17. Do you have any further comments on the structure of our guidance documents? If so, please provide your comments in the response.**
- Q18. Are there any areas where you think further guidance would be useful?**
- Q19. Do you have any further comments on our proposed administration for the Great British Insulation Scheme?**

Appendix 2: Abbreviations Table

Abbreviation	Explanation
BEIS	Department for Business, Energy and Industrial Strategy (Now known as DEPARTMENT FOR ENERGY SECURITY AND NET ZERO)
BUS	Boiler Upgrade Scheme
DESNZ	Department for Energy Security and Net Zero (formally known as BEIS)
DHS	District heating system
ECO	Energy Company Obligation
Flex	Flexible eligibility
EPC	Energy Performance Certificate
EWI	External wall insulation
GDPR	General Data Protection Regulation
HTHG	Help To Heat Group
HUG	Home Upgrade Grant
IMs	Innovation measures
ISLCT	Intra-Supplier License Consolidation Trading
LA	Local authority
GHG LAD	Green Home Grant Local Authority Delivery
NMAP	New Measures and Products
PAS	Publicly Available Specification
PPS	Partial Project Score
PRS	Private rented sector
RdSAP	Reduced Data Standard Assessment Procedure
SAP	Standard Assessment Procedure
SAP rating	Numerical value normally between 1 and 100 based on calculated energy costs for the premises.
SHDF	Social Housing Decarbonisation Fund
Solar PV	Solar photovoltaics
TMLP	TrustMark Licence Plus
UK	United Kingdom
WHD	Warm Home Discount

Appendix 3: Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. ie a consultation.

4. We will not be sharing personal data with any organisations outside of Ofgem.

5. Your personal data will be held until 6 months past the beginning of the scheme.

Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it.

You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it

- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/> or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.

10. More information

For more information on how Ofgem processes your data, click on the link to our "[Ofgem privacy promise](#)".