

# Decision

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## Ofgem's Administration consultation decision: Great British Insulation Scheme and ECO4 Amendment

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We consulted on our proposed administration of the Great British Insulation Scheme and this document confirms our final approach.

The scheme 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 legislation, The Electricity and Gas (Energy Company Obligation) Order 2023 (referred elsewhere within this document as the ECO4A Order), was made, and became law on 24 July 2023. Parts 1 to 9 of the legislation relating to the Great British Insulation Scheme came into force the following day on 25 July, and Part 10 relating to ECO4 came into force 21 days after the order was made on 14 August 2023. The scheme will run from 30 March 2023 (on an early delivery basis) 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).

Within this document we have summarised the responses received to our consultation on our administration of the Great British Insulation Scheme, our consideration of these responses and decisions made on our planned approach.

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## Introduction

### Section summary

Following our consultation on the administration of the Great British Insulation Scheme, this document considers the responses received, and sets out our final approach. It is not the intention of this document to set out the full details of the scheme or to provide full guidance; other related Great British Insulation Scheme and ECO4 scheme related documents are listed with links provided.

### What we consulted on

The Great British Insulation Scheme is a new scheme which started on 25 July 2023, and runs until 31 March 2026. Energy suppliers were able to voluntarily deliver measures from 30 March 2023, ahead of the legislation coming into force.

The Great British Insulation Scheme is designed to be a predominantly single measure scheme, focusing on installing the most cost-effective measures to achieve energy bill savings in as many homes as possible. This is in contrast to other pre-existing Government schemes, for example ECO4, which is a multi-measure scheme that aims to treat a whole premise, delivering the most cost effective measures to treat homes for households that are eligible, and to prepare homes adequately for low-carbon heating technologies.

Further details about the scheme can be found in the Great British Insulation Scheme Government Response<sup>1</sup> and in our draft guidance documents (see list of documents and links in the ‘Context and related publications’ section below).

Ofgem (‘we’, ‘us’ and ‘our’ in this document) will administer the Great British Insulation Scheme through new regulations The Electricity and Gas (Energy and Company Obligation) Order 2023<sup>2</sup> (the ‘ECO4A Order’) that place obligations on medium to larger energy suppliers to deliver notional annual bill savings through the delivery of energy efficiency measures.

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<sup>1</sup> Great British Insulation Scheme Government Response:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1152132/gb-insulation-scheme-government-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1152132/gb-insulation-scheme-government-response.pdf)

<sup>2</sup> The Electricity and Gas (Energy and Company Obligation) Order 2023:  
[https://www.legislation.gov.uk/uksi/2023/873/pdfs/uksi\\_20230873\\_en.pdf](https://www.legislation.gov.uk/uksi/2023/873/pdfs/uksi_20230873_en.pdf)

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In our consultation document<sup>3</sup> we set out for each relevant area of the ECO4A Order, the intended policy and how we proposed to administer this. The consultation also highlighted ECO4 amendments and administration that will be adopted from ECO4 for the Great British Insulation Scheme.

Within this document, having considered consultation responses, we have summarised consultation responses and detailed our final planned approach to administering the Great British Insulation Scheme.

We have consulted separately on Great British Insulation Scheme Local Authority and Supplier Flex proposals and therefore this area will not be covered within this administration consultation. You can find the decision document and related consultation on our website (links to both of these are provided in the context and related publications section below).

### **Disclaimer**

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 policy. For more details and a more extensive outline on the Government’s position, readers should refer to the Government Response and the legislation governing the scheme, the ECO4A Order.

Please be aware that this consultation was on our proposed administration of the scheme, including the processes that we proposed to use to assess and judge compliance with the scheme requirements. We were not consulting on the scheme policy as set out in legislation underpinning the Great British Insulation Scheme requirements. 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/contact](https://www.gov.uk/contact).

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<sup>3</sup> Ofgem Great British Insulation Scheme and ECO4 Amendment Administration Consultation: <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-amendment-administration-consultation>

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## Context and related publications

Below is a list of related publications from both the Department for Energy Security and Net Zero and Ofgem, relating to both the Great British Insulation Scheme and the related ECO4 scheme:

- ***The Electricity and Gas (Energy and Company Obligation) Order 2023***  
[https://www.legislation.gov.uk/uksi/2023/873/pdfs/uksi\\_20230873\\_en.pdf](https://www.legislation.gov.uk/uksi/2023/873/pdfs/uksi_20230873_en.pdf)
- Ofgem Great British Insulation Scheme and ***ECO4 LA and Supplier Flex Decision Statement***:  
<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-la-and-supplier-flex-decision-statement>
- Ofgem Draft Great British Insulation ***Scheme Supplier Administration Guidance***:  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-administration-guidance>
- Ofgem Great British Insulation Scheme ***Scoring Methodology***  
<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-scoring-methodology>
- Ofgem Great British Insulation Scheme ***forms and tables***  
<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-forms-and-tables>
- Ofgem Great British Insulation Scheme ***Draft Delivery Guidance***  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-delivery-guidance>
- Ofgem Great British Insulation Scheme ***Draft Data Dictionary***  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-data-dictionary>
- Ofgem Great British Insulation Scheme and ECO4 ***Amendment Administration Consultation***  
<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-amendment-administration-consultation>

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- Ofgem Great British Insulation Scheme and ECO4 **LA and Supplier Flex Consultation**

<https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-la-and-supplier-flex-consultation>

- 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>

- 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>

- Ofgem **ECO4 Guidance: New Measures and Products (NMAP)**

<https://www.ofgem.gov.uk/sites/default/files/2022-09/ECO4%20Guidance%20New%20Measures%20and%20Products%20V1.0%200.pdf>

- Ofgem **ECO4 Guidance: Supplier Administration**

<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-supplier-administration-v10>

- Ofgem Energy Company Obligation (**ECO4**) **Guidance: Delivery**

<https://www.ofgem.gov.uk/publications/energy-company-obligation-eco4-guidance-delivery>

- **The Electricity and Gas (Energy Company Obligation) Order 2022**

<https://www.legislation.gov.uk/ukdsi/2022/9780348236606/part/1>

## **Our decision-making process**

We worked closely with the Department for Energy Security and Net Zero so that the consultation process for our administration for the Great British Insulation Scheme could open as soon as possible after the finalised policy and draft legislation was made public. Our consultation ran for five weeks.



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We received 17 responses to the consultation in total from a range of stakeholders including from seven suppliers, six installers and related industry companies, three energy/trade and advisory groups and a local authority.

Once the consultation closed all responses were collated and reviewed by Ofgem. All responses and views were considered, and decisions were collectively made on all of the question areas. A full list of non-confidential respondents can be found in Appendix 1. We have also published these separately on our website alongside this document.

This decision document outlines our final position on the policy areas detailed in the consultation. The following chapters consider each consultation area in turn. Each section which relates to a specific consultation question summarises stakeholder responses. This is followed by Ofgem’s comments on those responses and our decision on the administration question.

There were some general feedback questions which have been incorporated into the specific areas where relevant.

In developing our final policy, we carefully considered all of the points raised by respondents, even if they are not specifically mentioned in this document.

### **Decision-making stages**

<b>Date</b>	<b>Stage description</b>
11/05/2023	Stage 1: Consultation open
16/06/2023	Stage 2: Consultation closes (awaiting decision), Deadline for responses
22/08/2023	Stage 3: Consultation decision/policy statement

### **General feedback**

We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this report. We’d also like to get your answers to these questions:

1. Do you have any comments about the overall quality of this document?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Are its conclusions balanced?
5. Did it make reasoned recommendations?

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6. Any further comments

Please send any general feedback comments to [GBISConsultation@ofgem.gov.uk](mailto:GBISConsultation@ofgem.gov.uk)

## 1. Suppliers

### Section summary

This section provides confirmation of our administrative approach to obligation thresholds, targets, early delivery, carry-over and carry-under.

### 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.

### Obligation thresholds

- 1.1 In our consultation document we outlined Department for Energy Security and Net Zero policy in relation to Great British Insulation Scheme obligation thresholds, and that this will be the same as for ECO4. Therefore, larger suppliers obligated by ECO4 will be obligated for this scheme too. Obligations similarly will be based on notional annual energy bill savings. Given these similarities the legislation does not require us to request separate notification data of customer numbers and supply volume from suppliers specifically for the Great British Insulation Scheme. Our approach therefore is that we will use data provided for ECO4 to calculate suppliers’ obligations and will notify suppliers of these obligations in a similar approach as we do for ECO4.
- 1.2 We will notify suppliers of their Phase A scheme obligations by no later than 5 September, this is six weeks after the coming into force (CIF) date of the ECO4A Order being made on 24 July 2023, when parts 1 to 9 of the legislation relating to the Great British Insulation Scheme came into effect the following day<sup>4</sup>.

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<sup>4</sup> The Electricity and Gas (Energy Company Obligation) Order 2023:  
[https://www.legislation.gov.uk/ukxi/2023/873/pdfs/ukxi\\_20230873\\_en.pdf](https://www.legislation.gov.uk/ukxi/2023/873/pdfs/ukxi_20230873_en.pdf)

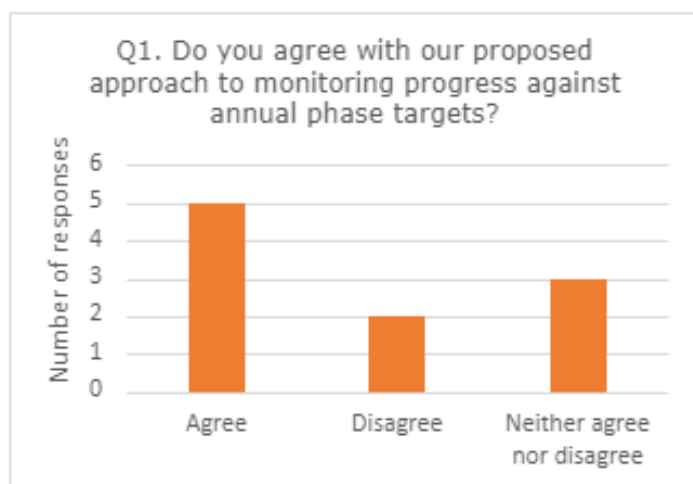
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- 1.3 This notification will include details of the low-income minimum requirement. This is a minimum level of deployment that suppliers must achieve by delivering measures to households that meet the low-income eligibility requirements. The low income requirement will be 20% of the overall phase target and provide targeted support to low income households that meet the scheme requirements. The notification also will indicate the home-heating cost reduction obligation target (the overall total three year target).

## Monitoring against targets: Annual targets

### Question 1.

**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.**



### Summary of responses

- 1.4 Suppliers are obligated by the Great British Insulation Scheme to achieve annual delivery targets in each year of the scheme (referred to as phases), as well as an overall target for the whole scheme duration. In our consultation we proposed that we will monitor suppliers’ progress against annual phase targets by reviewing notifications of measures and any provisionally approved measures. If we have any concerns a supplier is not on track to achieve their annual target, we proposed we will engage with suppliers more closely. We will not be able to confirm achievement of annual targets until the end of the scheme.

- 1.5 There were a total of ten responses to this question providing either confirmation of whether they agreed with the proposal and/or comments relating to the proposal. Five responses agreed with the proposal, two partially agreed (indicated in the neither agree nor disagree category in the graph above), two disagreed and one respondent neither agreed nor disagreed.
- 1.6 Agreement with the general approach of using notifications to monitor suppliers' progress was indicated by six respondents. Other comments included that this would provide structure and others welcomed the plan for us to engage actively with suppliers that are not on track to achieve their annual targets.
- 1.7 Eight respondents expressed concerns relating to how our proposed approach would apply for the target assigned to the first delivery phase, Phase A, and/or the consequences of not achieving their targets for Phase A. Contributing factors mentioned relating to this included:
- seeking clarity on what metric we intended to use to measure progress (our consultation referred to provisional notifications) (five respondents). Respondents sought confirmation of whether this would be using notifications with a status of 'with supplier' and 'notification incomplete', and some sought clarity on how this would work when targets were set based on notional annual bill savings.
  - the timing of the legislation coming into effect part way through the first obligation period (one respondent)
  - timing of final guidance (two respondents), with one supplier saying they would not start delivery until the final guidance was published.
  - timing of the register becoming available (four respondents) and an understood small window of time within which to notify measures.
- 1.8 Three respondents raised concerns in relation to transfers including on how these would operate when normally only possible for approved measures, and also referenced that the time window available for transfers would be limited. One respondent indicated that this could have a significant impact on some suppliers' ability to achieve the target.
- 1.9 Some respondents (four) also expressed views that it would be difficult for Ofgem to effectively measure and monitor achievement of targets in first year, this was related to expectations the register would not be available until January and therefore there would not be any data to do this. There was an expectation or hope expressed by some respondents (three) that Ofgem would handle any
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failure to achieve the first, Phase A annual targets with pragmatism and a flexible approach to enforcement.

- 1.10 Additional points raised by the respondents who disagreed outright with the proposal, included that they wanted confirmation of whether annual targets had been achieved annually. One respondent indicated that this would provide assurance and inform planning and delivery of future phases. Another supplier indicated that they expected Ofgem to be able to provide them with regular, possibly quarterly, updates on their progress towards achieving the targets.

### **Ofgem response & final administrative approach**

- 1.11 We will be carrying out manual processing of early delivery measures to help suppliers with verifying measures while we build our digital system. More information on manual processing and notification will be shared with suppliers soon.
- 1.12 With regards to the metric we intend to use to measure progress, 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. Taking compliance action in respect of annual obligation targets is at Ofgem’s discretion and we may consider a supplier’s notice that they intend to use transfers when evaluating progress.
- 1.13 We will be actively engaging with suppliers on their annual targets and overall obligation. In relation to concerns tracking progress, we would expect all suppliers to maintain their own records and be aware of both what measures they have ready to notify or that are lodged with TrustMark. Supplier records should include details of the measure and property characteristics, which suppliers could use to estimate scores against the scoring matrix and compare against their targets to monitor their progress. Ofgem will only be able to provide confirmation to a supplier that they have met their annual or overall target once the full scheme has ended (final determination). Taking compliance action in respect of annual obligation targets is at Ofgem’s discretion and we may consider a supplier’s notice that they intend to use transfers when evaluating progress.

- 1.14 We are aiming to publish the Delivery and Administration guidance later this summer. There are minimal changes between the draft and non-draft versions of the guidance.
- 1.15 Further information on how the transfer process will be managed can be found in chapter 8.

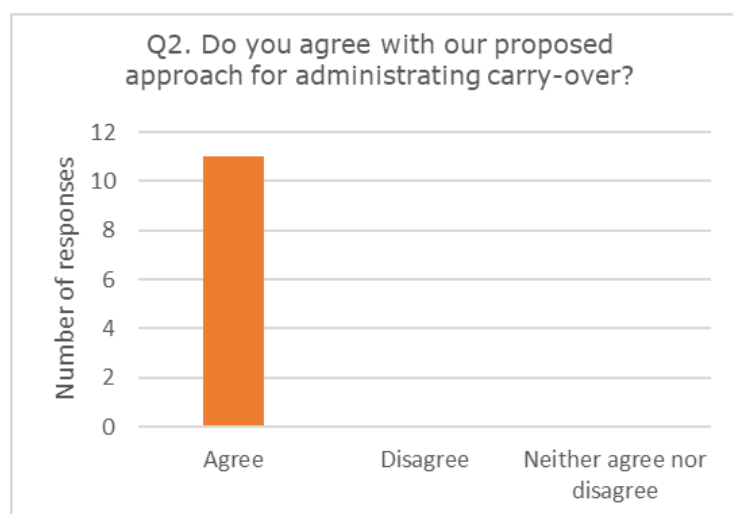
## **Early Delivery**

- 1.16 All measures delivered on or after 30 March 2023 until 24 July 2023 will be known as early delivery measures.
- 1.17 All early delivery measures will count toward suppliers’ Great British Insulation scheme targets, which also includes Innovation Measures and Flex caps. As part of our reporting, we will aim to clearly outline how suppliers delivered during early delivery and we expect that suppliers will also be tracking their own progress against their obligations.
- 1.18 Early delivery measures must be notified to Ofgem by 31 January 2024. We are working on creating a process to allow manual notification to take place before 31 January 2024. We will provide information and guidance with an explanation on how the manual notification process will work.

## Carry-over

### Question 2.

**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.**



- 1.19 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.
- 1.20 Carry-over therefore can only apply to annual bill savings delivered in Phase A or Phase B.
- 1.21 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.

### Summary of responses

- 1.22 We received a total of 11 responses to this question providing either confirmation of whether they agreed with the proposal and/or comments relating to the proposal. All respondents agreed with our proposal however there were some comments and concerns relating to carry-over.
- 1.23 Three respondents expressed concerns about the gap between the start of the scheme and the Great British Insulation Scheme Register going live. They



highlighted the possible effect this may have on managing their progress towards their obligation, carry-over, carry-under, caps and sub-obligations.

- 1.24 Two respondents suggested that Ofgem should increase the levels of monitoring and provide regular feedback which would allow suppliers to track progress towards targets, caps and sub-obligations.
- 1.25 One respondent commented that over-delivery should be encouraged and financial incentives provided to the industry to encourage the prompt roll out of insulation measures.
- 1.26 Another respondent suggested a change in terminology to have greater distinction between the scheme and ECO4.

### **Ofgem response & final administrative approach**

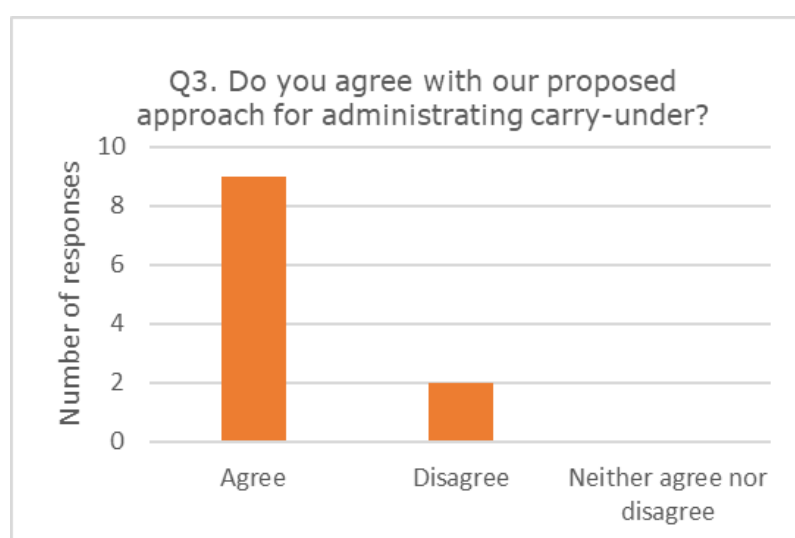
- 1.27 There will be no change to our proposed administrative approach to carry-over.
- 1.28 We have been working with internal teams to prioritise the roll out of the Great British Insulation Scheme Register. In addition, we are exploring alternative ways in which measures can be notified to us prior to the register going live.
- 1.29 Monitoring within the Great British Insulation Scheme will mirror our current standard for ECO4. We are exploring options to make our data and reports more accessible. Internal monitoring will continue throughout each scheme phase, and we will continue to engage with suppliers about their obligations and any challenges they face. In ECO4, in the period prior to close down, monitoring and supplier engagement is increased, and this approach of increased monitoring prior to closedown will likely be the same for the Great British Insulation Scheme. If suppliers have concerns about meeting their obligation, we will continue to work closely with them and offer support via additional engagement when necessary.
- 1.30 We agree that over-delivery should be encouraged, however it is not within our remit to offer financial incentives to the industry.
- 1.31 While we understand the need for distinction between the Great British Insulation Scheme and ECO4, we will continue to keep this in line with the terms used within ECO4. Our intention to keep terminology consistent is to reduce any confusion that may arise between the schemes. Our aim is to keep our administration of these schemes as similar as possible for ease of understanding

and interpretation. These terms are also already well embedded within the industry and are familiar to those working within it.

## Carry-under

### Question 3.

**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.**



1.32 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.

### Summary of responses

1.33 We received a total of 11 responses to this question providing either confirmation of whether they agreed with the proposal and/or comments relating to the proposal.

1.34 Of these, nine respondents agreed with our proposed approach to carry-under and two disagreed.

1.35 Of those that agreed, four specifically mentioned concerns around the gap between the start of the scheme and the register going live. They are concerned that this will impact their ability to effectively monitor their progress.

- 1.36 One respondent expressed concern that this gap may have a negative impact on meeting their annual targets. They suggested that compliance processes are paused for the first year of the scheme.
- 1.37 One of the respondents who disagreed shared concerns that by allowing any carry-under, it may devalue targets and may reduce pressure for rates to be competitive. The second respondent who disagreed commented that carry-under should not be permitted for the low-income group.

### **Ofgem response & final administrative approach**

- 1.38 There will be no change to our proposed administration of carry-under. As stated in paragraph 1.28, we have been working on alternative ways that measures can be monitored and notified to us within the period prior to the Great British Insulation Scheme Register going live. Ofgem are prioritising this and understand the concerns that respondents have raised about the timeframe. We will continue to work closely with suppliers with the aim to mitigate any difficulties they may face in respect of notifications and monitoring.
- 1.39 In relation to concerns expressed from some suppliers about the gap between the start of the scheme and the register going live, we would expect all suppliers to maintain their own records and be aware of both what measures they have ready to notify or that are lodged with TrustMark. Supplier records should include details of the measure and property characteristics, which suppliers could use to estimate scores against the scoring matrix and compare against their targets in order to monitor their progress.
- 1.40 Compliance processes are in place to protect both customers and suppliers by ensuring standards are being met; therefore we cannot overlook potential issues that arise through these processes that may cause significant risk. We will work constructively with suppliers to provide support in their efforts to meet their targets.
- 1.41 There were a couple of comments from respondents relating to policy regarding carry-under. The policy for allowing both carry-under (and carry-over) is within the remit of the Department for Energy Security and Net Zero therefore Ofgem cannot alter these aspects raised by these respondents, or the legislation requirements relating to them.

## 2. Homes and Household Eligibility

### Section summary

Responses to questions on verification of council tax bands for the general eligibility group and our approach to administration of the private rental sector (PRS) eligibility group are confirmed in this section alongside our approach to low-income eligibility and social housing.

### Questions

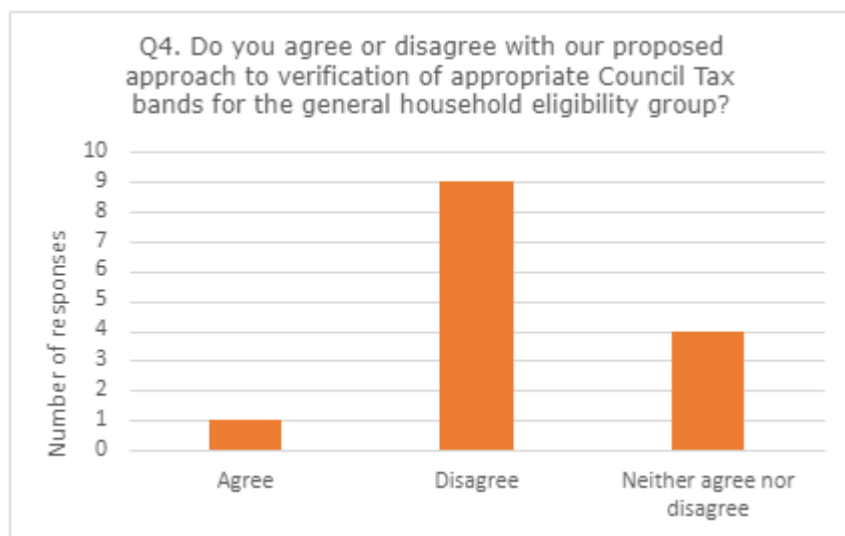
- Q4. Do you agree or disagree with our proposed approach to verification of appropriate Council Tax bands for the general household eligibility group? Please provide further information and evidence in relation to your response.
- Q5. Do you agree with our proposed administration of the PRS under the 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.

- 2.1 The Great British Insulation Scheme has been designed to offer more support to a broader group of households than the ECO4 scheme, and also to support vulnerable households. Scheme eligibility has been divided into two main groups:
- General eligibility
  - ‘Low-income’ group – similar to the Help to Heat groups supported by ECO4.
- 2.2 A minimum of 20% of each supplier’s annual phase target will be required to be delivered on measures installed to households in the low-income group.

## General Eligibility

### Question 4.

**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.**



### Summary of responses

- 2.3 In total there were 14 responses to this question. Of these nine responses explicitly stated a disagreement with the proposal to request copies of council tax bills for verification of council tax bands. 12 respondents indicated that the verification approach should be, or include as an alternative, use of online websites. The Valuation Office Agency (VOA) and Scottish Assessor's Association (SAA) websites were frequently mentioned.
- 2.4 Common concerns expressed by respondents with the proposed approach of providing copies of council tax bills for verification of council tax bands were that it would create additional administrative burden for installers, suppliers and potential beneficiaries, which was perceived to be unnecessary given the ready availability of the information online. The information online was perceived to be easily accessible and presenting a low level risk of fraud. There were concerns that potential beneficiaries will not have kept their council tax bill which is generally only sent once a year, and this could create additional burden for them and local authorities to secure an additional copy. There was also concern that

the requirement could ultimately act as a disincentive for beneficiaries who did not have a council tax bill readily available.

- 2.5 Three respondents explicitly suggested an alternative approach of using screenshots from the VOA and SAA websites. Five respondents suggested the use of a connection enabling two computer systems to communicate with each other, commonly referred to as an Application Programming Interface (API) connection, to enable an automatic look-up facility for installers, suppliers and/or Ofgem. One supplier indicated that they were themselves in the process of developing an API with the VOA.
- 2.6 A couple of respondents mentioned the importance of the approach taken being able to recognise any changes in council tax bands so that households that become eligible as a result of a revaluation can benefit from the scheme.
- 2.7 One respondent indicated they felt it was appropriate for suppliers to provide proof of council tax banding, and reduce the administrative workload of Ofgem, whilst another proposed that Ofgem should check the websites to verify eligibility.

### **Ofgem response & final administrative approach**

- 2.8 We investigated the feasibility of using VOA/SAA data to validate council tax bands. We encountered a number of challenges around access to, and format of, data in which meant an alternative approach was needed. We will however be continuing to pursue the feasibility of this approach further given its potential benefits in reducing administration and fraud. As council tax letters are asked for as part of a list of other potential evidence types for other aspects of ECO4 already, we proposed that these be provided.
- 2.9 Having considered the views and feedback as part of this consultation we have decided that it is appropriate in the first instance to accept screenshots from the VOA and SAA website for evidence of council tax bands. The information to verify council tax band screen shot data is available online, and we expect suppliers to take the necessary steps to ensure that the information that they retain as evidence for all measures notified is correct.
- 2.10 As with other evidence types that are required for measures, we may request council tax band screen shots from suppliers and verify the accuracy of these.
- 2.11 Should there be a high rate of ineligible, incorrect or falsified council tax band evidence detected, we may need to revisit this decision. Alongside this approach,

we will continue to explore whether there are other, feasible and more efficient approaches such as the API connection as mentioned above at paragraph 2.8.

- 2.12 A couple of respondents expressed the importance of ensuring that properties which had received a revised council tax banding could benefit if the revised banding rendered the property eligible. By accepting screenshots from the VOA and SAA website, installers and suppliers should be able to evidence the council tax band appropriate to a property at the time of the installation.

## **Low-income Eligibility**

### **Ofgem final administrative approach**

- 2.13 As the Great British Insulation Scheme includes a low-income group with eligibility criteria mirroring ECO4’s Help to Heat Group (HTHG) for low-income and/or vulnerable households, we did not include a consultation question on this area and intend to administer this group in largely the same way as for ECO4.

### **Low-income requirement**

- 2.14 There will be a requirement within the Great British Insulation Scheme that at least 20% of each supplier’s annual target is delivered to the low-income group<sup>5</sup>. As with ECO4, SAP bands will be assessed through the TrustMark API against data from the retrofit assessment and suppliers will report their Great British Insulation Scheme low-income group delivery / minimum requirement, including Council Tax information, to Ofgem by submitting supplier notifications to the register.

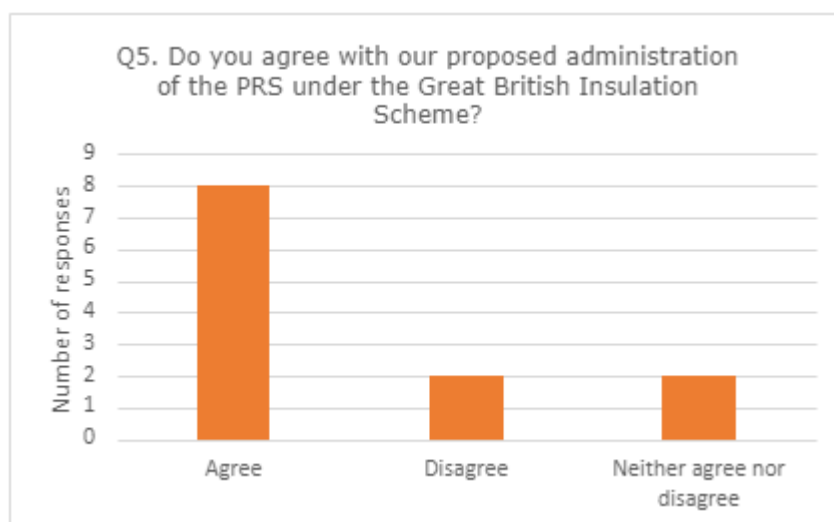
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<sup>5</sup> Householders who receive specific benefits (or if in receipt of Child Benefit and are below the equivalised income threshold for their household composition) are members of the low-income group. See our Great British Insulation Scheme Delivery Guidance for more details regarding this eligibility and how to evidence it (Chapter 3).

## Private rented homes

### Question 5.

**Do you agree with our proposed administration of the private rented sector (PRS) under the Great British Insulation Scheme? Please provide suggestions for alternative evidence if you disagree with our proposed approach.**



### Summary of responses

- 2.15 Out of a total 12 responses to this question, six respondents agreed with our proposed administration of PRS households, one partially agreed and five disagreed.
- 2.16 A key theme among those that agreed was based on an assumption the eligibility form we will require suppliers to provide was the same type of document as the Post-Installation Customer and Installer (PICI) form used for ECO4. The form contains a declaration from the occupants that the tenure type is PRS and is within either the low-income or general group. Written confirmation of this was requested.
- 2.17 Reasons for disagreement with the proposal included that Ofgem should also set up an automated data-matching system for the Great British Insulation Scheme to avoid those on low-incomes but not in receipt of benefits from being excluded. Suggestions included checking either Department for Work and Pensions (DWP) data and/or government-held PAYE data.
- 2.18 One respondent proposed that the current PICI form as used for ECO4 be adapted for the Great British Insulation Scheme.



**Ofgem response & final administrative approach**

- 2.19 Following the feedback concerning the declaration from occupants, we would like to clarify that the form to be completed by the installer will be the same type of PICI form as used for ECO4, however for GBIS it is currently the Post Retrofit Customer and Installer Declaration. This form has been published on our website alongside a broader range of Great British Insulation Scheme forms and tables<sup>6</sup>). We are looking into the feasibility of consolidating these forms and may do so in the future (see our response to question 15 relating to forms, from paragraph 10.5 for further details).
- 2.20 We have considered the points regarding using DWP and PAYE data to identify low-income households. Neither data set on its own would serve the purpose needed to evidence this. In addition, not all individuals receive income on either the PAYE system or DWP. An additional complexity is that this data relates to individuals whilst the information needs to be verified at a household level. Whilst we consider these points further, we expect suppliers to continue to collect the relevant eligibility evidence. For more consultation responses on the PICI form, please also see Question 6.

**Question 6.**

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<sup>6</sup> Great British Insulation Scheme forms and tables <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-forms-and-tables>

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**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.**



### Summary of responses

- 2.21 Of the 12 responses we received to this question, eight agreed with our proposed approach, two were in partial agreement, and two disagreed.
- 2.22 Of those who agreed, one sought clarity on whether the occupant declaration is only required where Land Registry searches and tenancy agreements are not available.
- 2.23 The respondent who disagreed did so on basis that a declaration from the occupant was not needed to confirm tenure type. They thought the same approach should be adopted as in ECO4 – to declare it in the eligibility requirements form section on PRS and social landlords, and evidence it by Land Registry/tenancy agreements. Asking occupants to make declarations would be administratively burdensome.
- 2.24 Those in partial agreement commented on the inclusion and exclusion of certain eligible measures in the scheme.

### Ofgem response & final administrative approach

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- 2.25 Following the feedback concerning the declaration from occupants, we would like to clarify that the form to be completed by the installer will be the same type of PICI form as used for ECO4. This is currently a separate form, the Post Retrofit Customer and Installer Declaration which has been published on our website<sup>7</sup>. We are looking into the feasibility of consolidating these forms and may do so in the future (see our response to question 15 relating to forms, from paragraph 10.5 for further details).
- 2.26 Regarding the inclusion or exclusion of measures under the Great British Insulation scheme, the decision on eligible measures is a matter for the scheme’s policymaker, the Department for Energy Security and Net Zero.

## **Social housing**

### **Ofgem final administrative approach**

- 2.27 As with ECO4, the Great British Insulation Scheme will offer support to social housing tenants. Due to social housing criteria, these households will automatically fall within its low-income group.
- 2.28 We aim to follow the same administration processes for social housing as we do for ECO4. 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. We will check that the measures notified are eligible with the tenure field. Where they are not eligible, we will reject those measures.
- 2.29 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.
- 2.30 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. This form will be the same type of form as used for ECO4. We are looking into the feasibility of

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<sup>7</sup> Great British Insulation Scheme forms and tables: <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-forms-and-tables>

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consolidating these forms and may do so in the future (see our response to question 15 relating to forms, from paragraph 10.5 for further details).

### 3. Off-Gas Rural Delivery

#### Section summary

The off-gas rural uplift applies to the low-income group in Scotland and Wales. Our approach to administering off-gas rural delivery for the Great British Insulation Scheme will be the same as for ECO4, although there may be some updates to the forms used, we are looking to streamline forms across both schemes (see section 10).

#### Questions

No questions in this section

- 3.1 **Ofgem final administrative approach** Recognising the additional costs and complexities associated with delivering measures in rural areas, the Great British Insulation Scheme policy includes an ‘off gas rural uplift’ for the low-income target group in Scotland and Wales. The uplift is applied to the cost-savings, which increases the value of the score for a relevant measure. This does not apply to equivalent homes in England due to the availability of the Homes Upgrade Grant.
- 3.2 Due to the similarities in approach to off-gas rural delivery in ECO4 we proposed using the same administrative processes for the Great British Insulation Scheme as has been used under ECO4. Our new Draft Great British Insulation Scheme Delivery Guidance recommends determining a home’s rurality through the ONS Postcode Directory, but any equivalent system can be used. This is then evidenced on the Great British Insulation Scheme Draft Pre-Retrofit Eligibility and Premises Declaration providing a yes/no response and the Output Area Code. In our consultation we stated that, like with ECO4, the Output Area Code would then be required during the notification process. We are currently reviewing the need for this level of detail in the notification process.



## 4. In-fill

### Section summary

Our administration of in-fill is set out within this section. In-fill is where households that are not eligible in their own right to be treated through the Great British Insulation scheme, but that are adjacent to properties that are eligible and treated, can in defined circumstances also benefit.

### Questions

No questions in this section

### Ofgem final administrative approach

- 4.1 Given the similarities with in-fill between ECO4 and the Great British Insulation Scheme the administration will be carried out in a very similar way. On the Great British Insulation Scheme Eligibility and Pre Retrofit Declaration both the primary Great British Insulation Scheme property and in fill properties should select the appropriate eligibility route. Both the primary and in fill properties property type must also be selected as either house or flat. The Great British Insulation Scheme Post Retrofit Customer and Installer Declaration should also have section B1 filled in for in-fill properties. Please read the Draft Great British Insulation Scheme Supplier Data Dictionary<sup>8</sup> for more information on what information is required when notifying measures.

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<sup>8</sup> Great British Insulation Scheme Supplier Data Dictionary:  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-data-dictionary>

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## **5. Interaction between Great British Insulation scheme and Other Schemes**

### **Section summary**

It is possible in defined circumstances for households to benefit from more than one energy efficiency scheme, and our administration on how to manage this interaction with other schemes is addressed within this section.

### **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?

### **Question 7.**

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

### **Summary of responses**

- 5.1 We received 15 responses for this question.
- 5.2 All 15 disagreed with adding an additional customer/landlord declaration form. A number of them highlighted that TrustMark and the duplicates process are already in place to identify potential interactions and adding an additional form would be an administrative burden.
- 5.3 In addition, nine respondents suggested that TrustMark should have a function for checking if funding has been claimed through any other Government scheme.

### **Ofgem response & final administrative approach**

- 5.4 There are currently no changes to the proposed monitoring of interaction between the Great British Insulation Scheme and other government schemes. Part of the

declaration which must be completed before a measure is installed (Pre retrofit declaration, part A. Customer Eligibility Declaration) requires confirmation of whether the measure has received funding from a government scheme, and if so which. As with all of the declarations, the information provided must be true and accurate, and if it is identified that information provided is incorrect, measures may be rejected. Any fraudulent activity including misrepresentation of property details may be reported to law enforcement agencies. Our duplicates processes will check to address duplicate notifications for measures across ECO schemes and within the scheme (see also our approach as set out in relation to Question 8 below). Ofgem are open to exploring additional ways in which duplication of funding can be identified through our systems.

- 5.5 We will not introduce an additional customer/landlord declaration form. We agree with the comments made by respondents on this issue and will continue to work with the existing forms that are in development.
- 5.6 We are unable to comment on the functionality available in relation to the TrustMark database as this is not within our remit, however we will pass the feedback received onto both the Energy Department and TrustMark for their consideration.

## **Question 8.**

**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?**

### **Summary of responses**

- 5.7 We received nine responses to this question. Four respondents shared a suggestion that TrustMark should have a function that would allow duplicate checks across multiple schemes. They also suggested that suppliers have access to this to enable them to identify duplicate measures or potential scheme interactions.
- 5.8 One respondent suggested that promotion of government schemes and grants should increase and include clearer information than what is currently given.
- 5.9 They also recommended that documentation viewed by the customer could be clearer and state explicitly that by accepting funding for the Great British



Insulation Scheme or ECO4, they are potentially making themselves ineligible for other schemes.

- 5.10 Two respondents requested further clarity on multiple measure scheme eligibility.
- 5.11 One respondent asked if a post-retrofit assessment from The Great British Insulation Scheme can be used as a pre-retrofit assessment for an ECO4 measure.

### **Ofgem response & final administrative approach**

- 5.12 The Department for Energy Security and Net Zero are responsible for setting out policy relating to scheme interactions and eligibility. Ofgem has no remit over this aspect of the scheme however we will feed back on this to the Department for Energy Security and Net Zero.
- 5.13 We are open to exploring additional ways in which duplication of funding can be identified through our systems.
- 5.14 Despite similarities between ECO4 and the Great British Insulation Scheme, the focus of each scheme differs. ECO4 aims to provide a full house retrofit via projects whereas the Great British Insulation Scheme is designed to deliver single measures through a fabric-first approach to as many households as possible. Therefore ECO4 projects and measures do not qualify under the Great British Insulation Scheme and vice versa.
- 5.15 We currently identify duplicate measures via an internal process and agree that there is scope to shape this process in the future to better fit both Ofgem and suppliers.
- 5.16 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.

## 6. Eligible Measures

### Section summary

This section outlines the proposed heating controls eligible under the Great British Insulation Scheme. Scheme measures will consist of a single measure, or two or more measures where one or more heating controls are installed.

### 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.

### Heating Controls

- 6.1 All heating controls installed under the Great British Insulation Scheme are called secondary measures. Secondary measures are only eligible for installation where an eligible insulation measure has first been installed in the same property under the Scheme, referred to as the primary insulation measure. Multiple secondary measures may be installed at one property supported by a single primary insulation measure.
- 6.2 Only Owner Occupied Starting SAP D-G customers are eligible for heating controls under the Scheme. The list of eligible heating controls in the Great British Insulation Scheme is as follows:
- Thermostatic radiator valves (TRV)
  - Boiler Programmers and Room Thermostat

## **Question 9.**

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

### **Summary of responses**

- 6.3 There were a total of 12 responses to the question. The majority of respondents agreed with our approach toward administering heating controls in question 9, with rationale for the agreement being a preference for consistency with other ECO schemes.
- 6.4 A stakeholder who agreed with our approach stated that heating controls should be allowed to be installed at the same time as an insulation measure to reduce disruption to customers and administration.
- 6.5 Of those who disagreed (four) with our proposal, the pool of eligible applicants was their main concern. They stated secondary heating controls should be opened to private rented sector premises and general eligibility to make the most of the scheme, they argued heating controls are a low-cost, energy saving technology that can save households money.
- 6.6 One respondent stated that they would like to see smart controls as an eligible measure within the Great British Insulation Scheme.

### **Ofgem response & final administrative approach**

- 6.7 We note that the majority of respondents agreed with our proposed approach towards heating controls. Ofgem's proposed position on administration of heating controls will remain as set out within our consultation.
- 6.8 We can confirm that the approach of allowing heating controls to be installed on the same day as the insulation measure will be allowed in accordance with the ECO4A legislation – where a heating measure can be installed on the same day or, not more than three months after the day on which the related insulation measure is complete.
- 6.9 A quarter of respondents argued for a larger eligibility pool for heating controls, and a single respondent asked for smart controls to be eligible within the Great British Insulation Scheme. We advise that certain smart controls are eligible

under innovation measures for the owner-occupier low-income group, within the scheme. These include smart thermostats, TRV, time and temperature control zone controls and programmer and room thermostats. Regarding a larger eligibility pool for heating controls, we advise this is not within our remit to change and is a policy decision made by the Department for Energy, Security and Net Zero.

## **Innovation**

### **Ofgem final administrative approach**

- 6.10 As the criteria for Great British Insulation Scheme Innovation Measures (IMs) 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.
- 6.11 Additional information on the proposed administration approach can be found in the draft Great British Insulation Scheme Delivery Guidance (6.67-6.75).<sup>9</sup> The current administrative approach under ECO4 can be found in Energy Company Obligation (ECO4) Guidance: New Measures and Products.<sup>10</sup>

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<sup>9</sup>Great British Insulation Scheme Draft Delivery Guidance:  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-delivery-guidance>

<sup>10</sup> Energy Company Obligation 2022-26 (ECO4) Guidance: New Measures and Products Ofgem:  
<https://www.ofgem.gov.uk/publications/energy-company-obligation-2022-26-eco4-guidance-new-measures-and-products>

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## 7. Scoring

### Section summary

This section communicates the proposed methodology for determining annual bill savings for measures installed under the Great British Insulation Scheme. It addresses the proposal to use notifications and forms to evidence and verify scores against the pre-retrofit RdSAP assessment in the Great British Insulation Scheme, and the uplifts available to low-income households under the Great British Insulation 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.

### Overarching Scoring Framework

- 7.1 The overarching scoring framework refers to the methodology for determining the annual bill savings associated with energy efficiency measures installed under the scheme.
- 7.2 Our consultation on our administration of the Great British Insulation Scheme set out the government's decision to adopt the current ECO4 partial project scores (PPS) as the overarching scoring framework for the Scheme. Government has also set out its decision to retain the 10% correction factor which is applied to all PPS.
- 7.3 The ECO4 PPS 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 percentage multiplier added to the score of a measure under specific circumstances.
- 7.4 We have published a Great British Insulation Scheme score matrix, containing only ECO4 PPS for those measures which are eligible in the scheme. These measures currently have the same scores as their ECO4 counterparts.

## **Evidencing Scores**

### **Question 10.**

**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.**

### **Summary of responses**

- 7.5 There were a total of ten responses to this question. No responses raised any strong objection to our proposal to collect evidence for scores using notifications and forms and verifying key details against the pre-retrofit RdSAP assessment.
- 7.6 Four respondents suggested Ofgem further improve the consistency between ECO4 and the Great British Insulation Scheme to reduce the administrative burden on the supply chain. One suggestion raised was to publish a combined PPS matrix for ECO4 and the Great British Insulation Scheme in the form of either an additional column added to the current ECO4 matrix, or via a separate tab within the spreadsheet.
- 7.7 A stakeholder queried the justification of requiring a post-retrofit assessment for the scheme as there is no minimum SAP band improvement requirement.
- 7.8 Another suggestion was to remove the duplication of efforts in lodging RdSAP assessments at TrustMark and notifications at Ofgem.
- 7.9 There was a request by one stakeholder to facilitate public data sharing of historical retrofits to improve consumer targeting and scheme uptake.
- 7.10 One respondent proposed that Ofgem plays a greater role in regulating managing agents and increasing PAS2035 certified installers, consultants and/or assessors.

### **Ofgem response & final administrative approach**

- 7.11 We recognise the benefit of publishing combined scoring matrices for both ECO4 and the Great British Insulation Scheme given that the scores are currently identical for relevant measures. However, these scores may diverge subject to any changes arising from the Department for Energy Security and Net Zero’s

Energy Company Obligation SAP and RdSAP Amendments consultation.<sup>11</sup> .

Consequently, an ECO4 measure may have a different score to a Great British Insulation Scheme measure, and as a result there is benefit in preventing future confusion by maintaining different score matrices.

- 7.12 Considering stakeholder requests to combine the scores and in an effort to prevent future confusion as the schemes scoring methodology diverge, Ofgem will not amalgamate the two schemes’ matrices into one file. However, going forward we will publish multiple formats of the scores matrices to help assuage stakeholder concerns. In practice this would mean the scores matrices will be published in two formats: an Excel workbook and a comma-separated values (csv) file. Excel workbooks allow more functionality than the current comma-separated values (csv) file format and thus would enable a separate sheet to be created for both ECO4 and the Scheme should members of the supply chain wish to merge the matrices at their own discretion. This would partially address stakeholder requests for a combined matrix and hopefully ease some administrative burden caused by separate scheme scoring methodologies.
- 7.13 Ofgem requires the pre-retrofit RdSAP assessment to determine the starting SAP rating and floor area and evidence the pre-retrofit bill savings. The post-retrofit bill savings and subsequent score will be determined by the aggregate PPS of the delivered measures. Therefore, the post-retrofit RdSAP assessment is not administratively necessary to determine the final bill savings, however the completion of a post-retrofit RdSAP assessment is mandated by the legislation. We acknowledge the additional task this incurs on the supply chain; however, the inclusion of the post-retrofit assessment avoids the need for some industry parties to amend or create new systems that were previously, and continue to be, used for ECO4. As a result, this reduces costs along the supply chain as the post-retrofit assessment itself poses close to no additional cost due to it being a desktop exercise. More information on this policy position can be found in the Department for Energy Security and Net Zero’s government response.<sup>12</sup>

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<sup>11</sup> Energy Company Obligation SAP and RdSAP Amendments:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1178291/energy-company-obligation-sap-and-rdsap-amendments.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1178291/energy-company-obligation-sap-and-rdsap-amendments.pdf)

<sup>12</sup> Energy Company Obligation Great British Insulation Scheme (2023-2026) & Amendments to ECO4 regulations Government Response:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1152132/gb-insulation-scheme-government-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1152132/gb-insulation-scheme-government-response.pdf)

- 7.14 We recognise there is some duplication of effort incurred by the energy suppliers when notifying both Ofgem and TrustMark of measures installed under the Scheme. However, Ofgem’s role as the scheme administrator necessitates the collection of information which does not fall under the remit of TrustMark and helps to ensure that energy suppliers are compliant with scheme rules. Moreover, with the functionalities such as early delivery, the gap between notification and installation, and the construction of the Great British Insulation Scheme Register, we are unable to rely wholly on the API from Trustmark warehouse. Therefore, we retain our existing position to use forms and notifications to validate information gathered via the pre-retrofit RdSAP assessments lodged in TrustMark’s Data Warehouse or equivalent.
- 7.15 We acknowledge the request for increased public sharing of key data and will take it into consideration going forward. At present, an overview on volumes of both projects and measures submitted under ECO4 can be found on the Ofgem website.<sup>13</sup>
- 7.16 We recognise there are some benefits to ensuring quality through increased access of PAS2030 certified assessors and coordinators who adhere to PAS2035 standards, and the regulation of third-party managing agents, however we believe that this responsibility falls outside the Great British Insulation Scheme legislation and the remit of Ofgem as the Great British Insulation Scheme administrator. Therefore, Ofgem will not be taking an approach to address this point; however, the Department for Energy Security and Net Zero has taken action to increase the number of PAS2030 certified assessors and coordinators available in the United Kingdom. More information concerning this funding can be found on the GOV.UK website.<sup>14</sup>

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<sup>13</sup> ECO public reports and data: <https://www.ofgem.gov.uk/environmental-and-social-schemes/energy-company-obligation-eco/contacts-guidance-and-resources/eco-public-reports-and-data>

<sup>14</sup> Government press release, ‘Thousands to be trained to boost energy efficiency in homes across the country (25 July 2023): <https://www.gov.uk/government/news/thousands-to-be-trained-to-boost-energy-efficiency-in-homes-across-the-country>

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## **Uplifts**

### **Ofgem final administrative approach**

- 7.17 As the criteria for the two uplifts for Great British Insulation Scheme 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 did not consult on this area.

## 8. Delivery & Administration

### Section summary

This section covers questions relating to our administration of supplier delivery. This includes the notification, trades and transfers processes as well as our proposed administration of caps.

### 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.

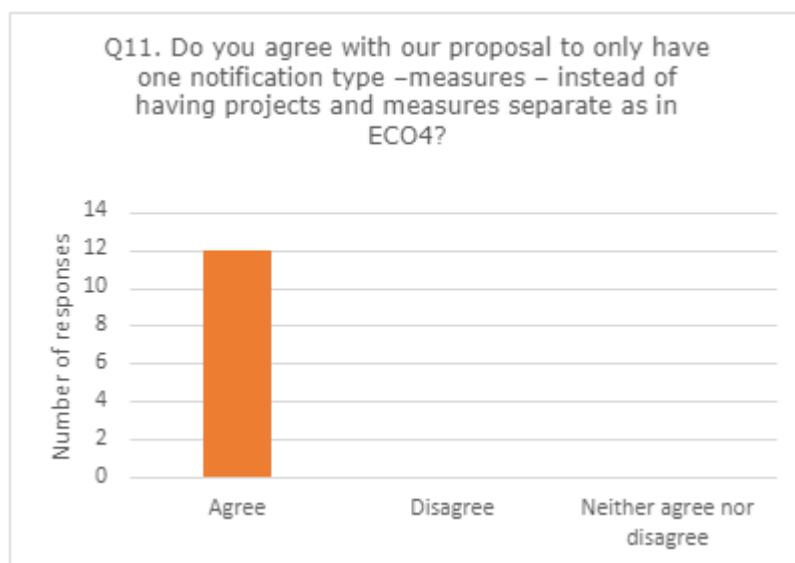
### Notifications

#### Question 11.

**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.**

**Decision** – Ofgem’s Administration consultation decision: Great British Insulation Scheme and ECO4 Amendment

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**Summary of responses**

- 8.1 All 12 respondents who answered this question agreed with the proposal.
- 8.2 One respondent suggested that, if there is only one notification, there should be some way to track heating controls. Another suggested that the notification template should include the TrustMark project reference number.

**Ofgem response & final administrative approach**

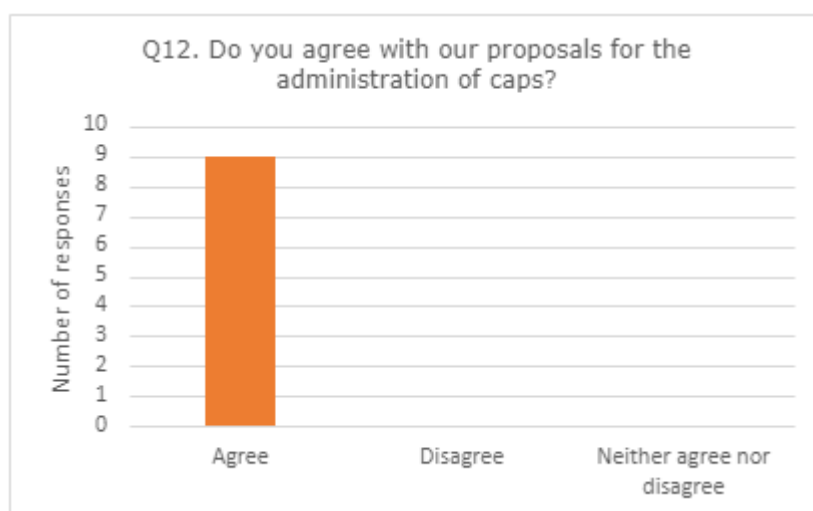
- 8.3 We will implement our proposal as set out within the consultation. The Great British Insulation Scheme Register will only accommodate a single type of notification, which will be a measure notification and should contain all the information we require to be notified. There will be no separate project notifications as there are on ECO4. This is due to the simpler rules of the scheme compared to ECO4, and the limited number of measures to be installed in each property.
- 8.4 To provide clarity regarding heating controls, these should also be notified to Ofgem using this template. Where a property has both insulation and heating controls installed, these should all be notified as individual measures using the measure template.

8.5 The TrustMark project reference number, along with other details of the TrustMark lodgement, will be included in the template. This is contained in the draft data dictionary published on our website<sup>15</sup>.

## Caps

### Question 12.

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



### Summary of responses

8.6 All nine respondents who answered this question agreed with the proposal.

8.7 One respondent stated that more innovation measures should be allowed in the scheme. Another highlighted the importance of suppliers knowing their progress towards completed obligations early, as this informs the size of their caps.

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<sup>15</sup> See Great British Insulation Scheme Supplier Data Dictionary:  
<https://www.ofgem.gov.uk/publications/draft-great-british-insulation-scheme-supplier-data-dictionary>

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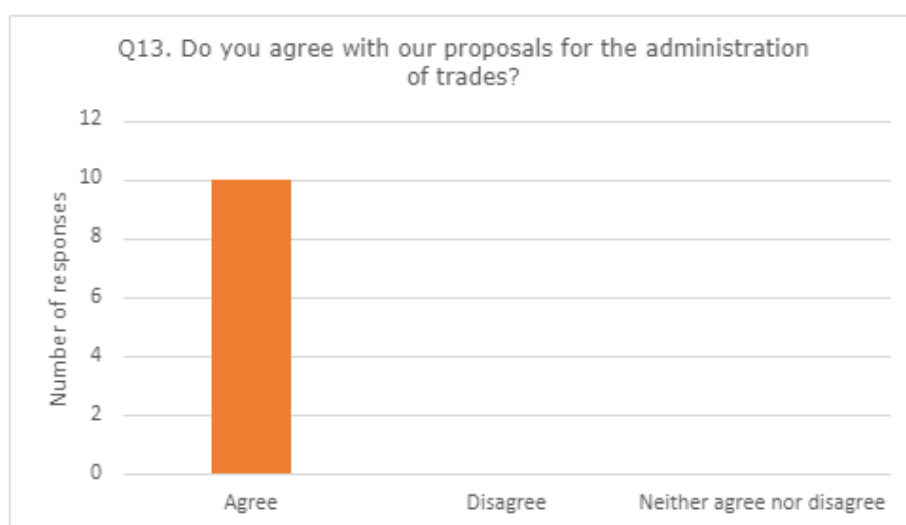
### **Ofgem response & final administrative approach**

- 8.8 We will implement our proposals as set out within the consultation. Caps will be enforced at final determination and not throughout the scheme, where suppliers may temporarily go above caps without consequence. In addition, suppliers will be given the choice of which measures will be impacted when going above a cap.
- 8.9 The size of the innovation cap is fixed in legislation, and as such outside of Ofgem’s control. Ofgem intends to provide suppliers with regular updates on their progress towards their obligations throughout the scheme so suppliers will be aware of progress towards their caps.

## **Trades**

### **Question 13.**

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



### **Summary of responses**

- 8.10 All ten respondents who answered this question agreed with the proposal.
- 8.11 Only one response had further comment, which suggested the deadline for submitting trade requests should be 31 January for each phase rather than 31 December, as this would give more time to establish progress against that phase’s obligation before deciding if trades are needed.

### **Ofgem response & final administrative approach**

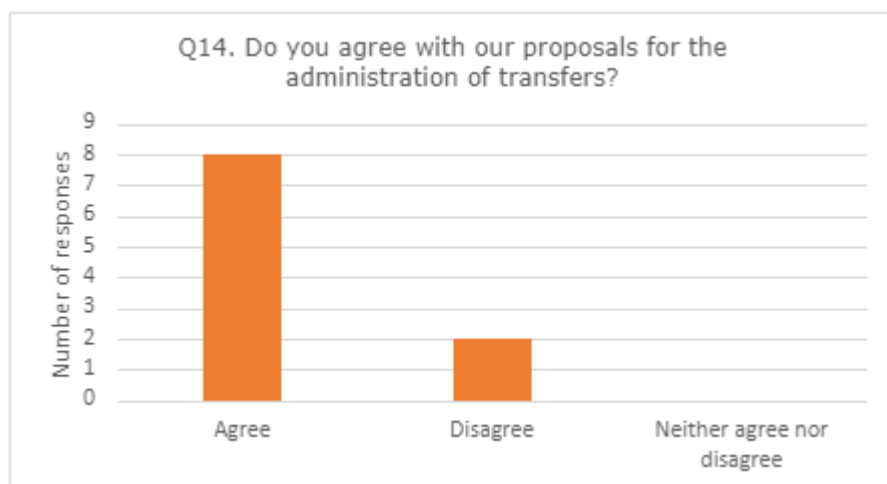
8.12 We will implement our approach to trade requests as proposed. The trade deadline of 31 December is fixed in legislation so outside of Ofgem’s control. We would re-iterate that trade requests only need to be submitted before the deadline, not finalised. We may assess these requests after the deadline has passed and may allow requests to be updated or withdrawn after the deadline.

8.13 We may assess and approve trade requests without requiring the Great British Insulation Scheme Register to be live, therefore trades are unaffected by system development timelines.

## **Transfers**

### **Question 14.**

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



### **Summary of responses**

8.14 Of the ten respondents to this question, eight agreed and two disagreed. Those who disagreed stated that there should be no requirement for measures to be approved to be transferred, as measures won’t be approved until the approval system is in place and the expected timelines of this mean inter-supplier transfers won’t be possible within Phase A. In addition, a common request across

respondents was for information on the possibility of transferring measures between ECO4 and the Great British Insulation Scheme.

### **Ofgem response & final administrative approach**

- 8.15 We will implement our proposed approach to transfers. Transfers will require measures to be approved for inter-supplier transfers (between different suppliers) but not intra-supplier (between licenses under the same supplier) transfers. Regarding timelines, we would re-iterate that, unlike trades, transfer requests are not subject to per phase deadlines. Requests to transfer measures from any phase can be made up to a single deadline of 30 June 2026. This means there is no particular reason to complete phase A transfers by the end of phase A. Taking compliance action in respect of annual obligation targets is at Ofgem’s discretion and we may consider a supplier’s notice that they intend to use transfers when evaluating progress.
- 8.16 The ECO4 and Great British Insulation Schemes are mutually exclusive, and there is no mechanism to allow measures to be transferred between these schemes.

## 9. Quality & Standards

### Section summary

This section communicates the approach for determining the main areas involving the guarantees, installation standards and smart meters. The intent is to ensure that requirements for measures are set in accordance with PAS and where applicable the appropriate measures through the TrustMark’s quality assurance framework. This section also addresses the quality assurance and consumer protection measures for the Great British Insulation Scheme.

### Questions

No questions in this section

### Guarantees

- 9.1 There were no questions and no proposed changes to this section outline and therefore we are following the same process as outlined in the consultation. This being that the requirements and standards will be mandated by TrustMark through their registration and compliance of the quality assurance framework.
- 9.2 In addition, any measures placed with TrustMark that do not meet the applicable compulsory guarantee obligations will not be considered a qualifying Great British Insulation Scheme measure.

### Installation Standards

- 9.3 There were no questions and no proposed changes to the installation standards and therefore we are following the same approach as outlined in the consultation. This being that measures installed will be required to meet the most up-to-date PAS standards and will be mandated through the TrustMark framework with exemptions being evidenced in the same process as ECO4, through the PAS2035.
- 9.4 Measures delivered in accordance with the PAS 2030/2035 standard, include cavity wall insulation loft insulation in low-risk scenarios and heating controls.



## **Smart Meters**

- 9.5 In summary, there will not be any changes to this approach and therefore we will be continuing on the same course of direction as set out in the consultation. This includes smart meter advice continuing to be mandatory under the Great British Insulation Scheme.
- 9.6 As with ECO4, installers and retrofit coordinators are required to provide advice on the benefits of smart meters under the Great British Insulation Scheme.

## 10. Forms

### Section summary

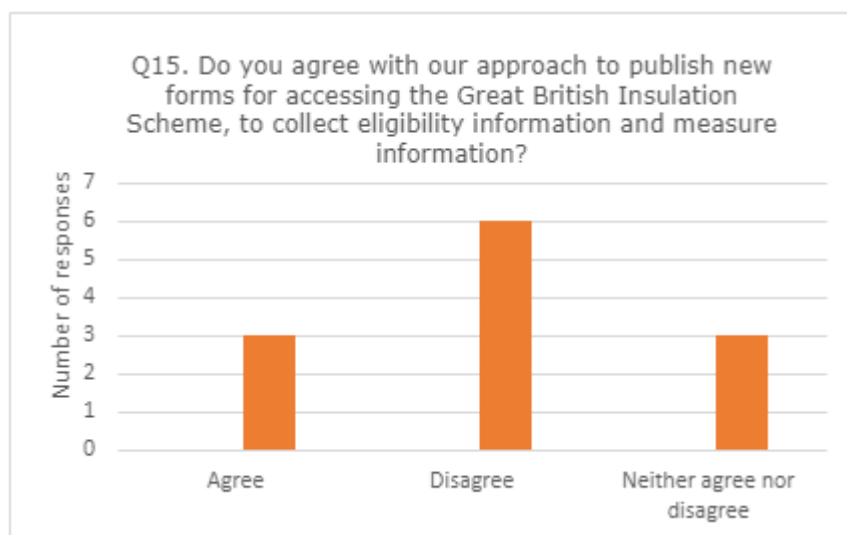
This section covers the proposed approach towards forms used to access the scheme and declare eligibility of measures.

### 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.

### Question 15.

**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.**



### Summary of responses

10.1 A total of 12 stakeholders responded to this question, where most respondents who expressed a view (six) disagreed with our position on publishing new forms for the Great British Insulation Scheme, three agreed and three neither agreed nor disagreed.

- 10.2 Those that agreed with the approach of publishing new forms did so with the caveat of simplifying the forms and reducing signatures and excess information collection.
- 10.3 Of those who disagreed, the majority did so for comparable reasoning which is a preference for combining both ECO4 and Great British Insulation Scheme forms. One respondent stated they support simplifying forms as much as possible, but also support combining forms for further simplicity, as well as reduction of administration burden for suppliers and installers. Another respondent stated conjoined forms would ease the customer journey and allow greater flexibility for installers when on site and assessing properties for either scheme.
- 10.4 Further comments included wanting the new forms to be shortened and simplified, with any information collected by TrustMark to be removed.

#### **Ofgem response & final administrative approach**

- 10.5 We appreciate industry’s suggestion of merging ECO4 and Great British Insulation Scheme forms, and we are considering merging some of the forms as a first step in our overall transformation of the forms.
- 10.6 As part of our first step the following forms have been merged and can be used for both ECO4 and Great British Insulation Schemes in order to simplify the process during both schemes:
- ECO4 and the Great British Insulation Scheme ECO Reporting and Evidencing Forum Privacy Notice
  - ECO4 and the Great British Insulation Scheme – Templates to Evidence Private Domestic Premises and Social Housing
  - Pre-Existing Loft Declaration
- 10.7 We acknowledge the feedback received on merging forms as this could streamline the process of filling out forms and reduce the resources required. However, there are also potential drawbacks that need to be considered before proceeding to merge both scheme forms.
- 10.8 One of the potential issues of merging forms is the possibility of creating confusion with multiple sections on a single form which can lead to difficulties and errors when submitting documentation.

- 10.9 Overlooking or neglecting the importance of thorough and careful documentation can lead to delays in processes and could have financial implications for the supply chain.
- 10.10 Although merging forms may require some effort from industry members to familiarise themselves with the new format, it is essential for Ofgem to evaluate the overall impact of such a move.
- 10.11 Our view and approach going forward is to explore different options of merging both scheme forms as well as to explore potential innovation. With this in mind, we are looking into engaging with members of the ECO Reporting and Evidencing Forum<sup>16</sup> in order to achieve this.

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<sup>16</sup> ECO Reporting and Evidencing Forum Terms of Reference:  
<https://www.ofgem.gov.uk/publications/eco-reporting-and-evidencing-forum-terms-reference>

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## 11. ECO4 Amendment

### Section summary

This chapter covers our planned approach to administering the changes to the ECO4 scheme brought by the ECO4 amendment included in the same legislative package as the Great British Insulation Scheme. An overview of those changes is included in our consultation.

### Questions

No questions in this section

### Ofgem response & final administrative approach

- 11.1 Included in the same legislation which establishes the Great British Insulation Scheme are various amendments to the Electricity and Gas (Energy Company Obligation) Order 2022 ("ECO4 Order). As indicated within our consultation, the ECO4 Order 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. For further details relating to all of the changes to ECO4 please refer to the Great British Insulation Scheme (2023-2026) & Amendments to ECO4 regulations government response<sup>17</sup>.
- 11.2 We will adjust our administration of ECO4 in line with these changes and publish updated versions of the relevant documents. Changes will be reflected in:
- V2.0 of the delivery guidance
  - V4 of the ECO4 partial project scoring matrix
  - V1.2 of the supplier data dictionary
  - Updates to the various ECO4 forms
  - Updates to the ECO4 Register validation rules.

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<sup>17</sup> the Great British Insulation Scheme (2023-2026) & Amendments to ECO4 regulations government response:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1152132/gb-insulation-scheme-government-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1152132/gb-insulation-scheme-government-response.pdf)

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## 12. General Administration

### Section summary

This section focuses on the scheme guidance in general, including its structure, whether having a singular guidance document for local authorities would be beneficial, and if any further guidance would be helpful. It also sought wider feedback on Ofgem’s overall administrative approach for the Great British Insulation Scheme.

### 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?

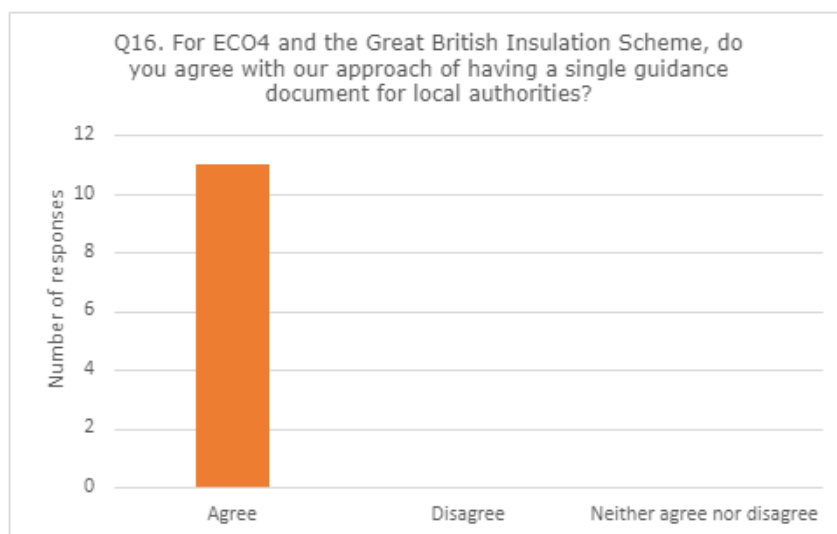
### Segmenting our guidance documents

#### Question 16.

**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.**

## Decision – Ofgem’s Administration consultation decision: Great British Insulation Scheme and ECO4 Amendment

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### Summary of responses

- 12.1 For the question set out above there were a total of 11 responses. All stakeholders agreed with having a single guidance document for local authorities. Common reasons for agreement were that a singular document reduces administrative burden for local authorities and makes paperwork less complex. A stakeholder who agreed also stated the guidance document should be concise and clear.
- 12.2 A few stakeholders stated that alongside the document they would like to see more Flex events to support local authorities.
- 12.3 One stakeholder advised they would like to see more support for local authorities outside of the guidance document. They stated they would like to see a dedicated ECO / Great British Insulation Scheme LA Flex manager in England that oversees local authorities.

### Ofgem response & final administrative approach

- 12.4 Ofgem has published a singular ECO4 and the Great British Insulation Scheme guidance document for local authorities<sup>18</sup>. This will help reduce the amount of paperwork for stakeholders and ease administrative burden.

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<sup>18</sup> Ofgem’s Great British Insulation Scheme and ECO4 Local Authority Administration Guidance: <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-and-eco4-local-authority-administration-guidance>

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- 12.5 In response to the stakeholder who requested more Flex events for local authorities, Ofgem are currently discussing the best ways to interact with local authorities with a view to having more regular communications and events which would address further local authority or stakeholder concerns. In addition to flex events we have broadened our engagement, including engagement with the Local Government Association, Association of Local Energy Officers (formerly the Carbon Action Network) and local authorities.
- 12.6 Ofgem acknowledges the feedback to introduce an ECO manager for local authorities. We understand the need for support for local authorities with Flex for the scheme. In addition to the planned increase in communications, there are colleagues within Ofgem and the Department for Energy and Net Zero whose work is focussed on flex, and we also aim to support local authorities with Flex issues in future flex events and other types of engagement such as bilaterals, newsletters and email queries. We will continue to review the level of support required.

## **Question 17.**

**Do you have any further comments on the structure of our guidance documents? If so, please provide your comments in the response.**

### **Summary of responses**

- 12.7 There were six further comments from respondents relating to the structure of the guidance. Four respondents asked for a version of the guidance document where the differences between ECO4 and the Great British Insulation Scheme are highlighted, or where there are similarities that is also noted within the document. The reason being was to reduce the amount of paperwork stakeholders engage with for both schemes.
- 12.8 Another respondent suggested including a list of all tables and increasing cross referencing in guidance documents as this would assist with finding relevant information.
- 12.9 A few stakeholders advised including more scenarios or worked examples within the guidance document. This was so stakeholders could have real life examples of



how certain scheme rules are interpreted in practice and reduce the need to reach out to Ofgem via the queries inbox.

### **Ofgem response & final administrative approach**

12.10 Regarding publishing a version of the guidance document where differences between ECO4 and the Great British Insulation Scheme are highlighted, we are exploring options of how to make the information in the guidance document clearer and more accessible, and we will be publishing an updated version of the scheme guidance document in early autumn.

12.11 In regard to including a list of tables and improving cross referencing in the guidance document, we have welcomed this suggestion and will be including this in the updated scheme delivery guidance.

12.12 We understand how incorporating more scenarios within the delivery guidance could support suppliers and installers in delivering measures as part of the scheme. We will continue working with suppliers to establish how relevant scenarios can be shared with the supply chain in an effective manner.

### **Question 18.**

**Are there any areas where you think further guidance would be useful?**

### **Summary of responses**

12.13 There was a variety of feedback to this question with seven stakeholders providing further comments on Ofgem’s administration. Four stakeholders had no further comments.

12.14 Three respondents stated they would like confirmation of whether Hybrid Wall Insulation would be an eligible measure as part of the Great British Insulation Scheme.

12.15 Three respondents also advised they would like to see a live or regularly updated page on the Ofgem website which provides key changes in the scheme, summaries of updates and which shares responses to key questions raised at bilateral meetings with suppliers. A stakeholder has argued that quarterly delivery guidance and monthly newsletters updates are too slow in providing updates.

12.16 A stakeholder stated they would like documentation for the scheme to be kept simple and as consistent with ECO4 as possible.

12.17 Feedback has suggested that guidance for local authorities is not effective, where local authorities have struggled in ECO4, and this should be mitigated in the Great British Insulation Scheme by holding more local authority workshops.

12.18 A stakeholder stated that scheme-wide queries being circulated to all obligated suppliers would ensure that every supplier is working to the same requirements and reduce the need for individual stakeholders sending queries to Ofgem.

### **Ofgem response & final administrative approach**

12.19 Regarding Hybrid Wall Insulation, Ofgem can confirm that this is an eligible measure, which is already included within the draft delivery guidance, and will be included in the updated scoring matrix once published.

12.20 Ofgem do not currently feel a live guidance style document would be the most beneficial way to update stakeholders with scheme-wide news. We currently use monthly newsletters, supplier bilaterals, quarterly supplier forums, Department for Energy Security and Net Zero quarterly supplier meetings and formal emails to obligated suppliers to cascade information, we expect this information to be cascaded by suppliers to their delivery partners. However, going forward we will look into increasing the frequency of updates on newsletters to ensure stakeholders are up to date with scheme changes. We will ensure that significant policy decisions directed to us via queries are cascaded to suppliers through the above communication channels and we will also share query responses with suppliers via huddle.

12.21 We will be keeping documentation as simple and consistent with ECO4 as possible and will incorporate any changes in the updated delivery guidance which will be published in early autumn.

12.22 We are also aiming to have more regular communications and events with local authorities to increase knowledge and mitigate any Flex related concerns that could arise in the scheme.

## **Question 19.**

### **Do you have any further comments on our proposed administration for the Great British Insulation Scheme?**

#### **Summary of responses**

- 12.23 For this question there were a total of 13 responses with ten further comments on the proposed administration of the scheme.
- 12.24 Five respondents asked for clarity on timelines of the residuals and duplicates process for the scheme. Respondents also asked for the same deadline for duplicates and residuals for simplicity, and the option to provide feedback on the processes. Stakeholders also stated there should only be one register to notify measures for a consistent approach, to be less of a burden on supplier resource and make the scheme easy to process.
- 12.25 A respondent asked for Ofgem to reconsider its requirement for the use of a pre-install RdSAP assessment. They believed it may limit the practical applications of loft insulation due to costs incurred.
- 12.26 A respondent stated they believe the PRS group should be allowed to receive loft and cavity wall insulation measures, and secondary measures should also be opened up to both owner occupied and PRS group. They also stated that innovation measures should be more accessible, and progressing with these within park homes may cause risk as there is no best practice guidance yet.
- 12.27 The same respondent also called for quicker response times to queries, as they stated that this impacts deadlines for notifying measures. They also asked for Ofgem to make guidance as clear as possible, specifically in what the scheme rules are for suppliers.
- 12.28 A respondent called for the loft guarantee to be moved from two years to six years, and for Ofgem to ensure timely payments for measures installed under the scheme.
- 12.29 One stakeholder responded that they would like Ofgem to create a clear framework for managing agents to ensure they know how to use products correctly. They wanted Ofgem to publish details on the roles and accountability for them also as part of the administration guidance.

**Ofgem response & final administrative approach**

- 12.30 It is our intention to integrate the Great British Insulation Scheme duplicates into the current ECO4 duplicates process. This can begin once we have established the process for manual notifications and will need to coincide with the quarterly identification process in place for ECO4. We anticipate that it will be possible for the identification of duplicates on the Great British Insulation Scheme to start in April 2024, however if we can start the process earlier and we will inform suppliers in advance. Timescales for the residuals process can only be provided leading up to the register going live as the process is reliant on a working register.
- 12.31 Ofgem at this stage cannot reconsider the use of pre-install RdSAP assessments or reconsider measures for the PRS or owner occupier groups as these are policy issues not within our remit, and therefore we did not consult on these. We will however share this feedback with the Department for Energy Security and Net Zero for consideration.
- 12.32 Our current target is responding to queries within ten working days. However, many of our queries are complex and can require input from multiple stakeholders which adds delays to responses, meaning query response times can unfortunately often go over the target deadline, we are however focussed on this target. We also see a high influx of queries specifically at the start of a new scheme and the team will continue to prioritise the queries being sent. As part of the process, we will ensure a holding email is sent which will provide an update to the sender as well as common query responses being cascaded to suppliers via huddle.
- 12.33 Ofgem will discuss with TrustMark if it is possible to change the loft guarantee from two years to six years, however, this decision lies with TrustMark, therefore this is not something we can currently amend.
- 12.34 Ofgem does not have the power to regulate payments due between different members of the supply chain. These payments will be governed by contracts to which Ofgem is not party. It is for industry to determine the engagement or utilisation of third parties such as managing agents, as Ofgem does not have the power to do so. Therefore, Ofgem would be unable to intervene in supply chain management issues.

## Appendices

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1	List of respondents	61
2	Abbreviations table	62

## **Appendix 1 List of respondents**

1. Agility Eco
2. Anesco
3. British Gas
4. Clean Eco
5. E.ON UK Solutions
6. EDF
7. Energy Saving Trust
8. Energy UK
9. Huntsman Building Solutions
10. Isle of Anglesey County Council
11. Octopus
12. OVO
13. Scottish Power
14. So Energy
15. The Energy Efficiency Infrastructure Group

The list above excludes two respondents whose responses are being treated as confidential.

## Appendix 2 List of abbreviations

Abbreviation	Explanation
API	Application Programming Interface connection
BEIS	Department for Business, Energy and Industrial Strategy (Now known as Department for Energy Security and Net Zero)
BUS	Boiler Upgrade Scheme
CIF	Coming into force date of legislation
csv	Comma separated values file
DWP	Department for Work and Pensions
DHS	District heating system
ECO	Energy Company Obligation
ECO4 Order	Electricity and Gas (Energy Company Obligation) Order 2022
ECO4A Order	The Electricity and Gas (Energy Company Obligation) Order 2023
Flex	Flexible eligibility
EPC	Energy Performance Certificate
HTHG	Help To Heat Group
IMs	Innovation measures
LA	Local authority
MEES	Minimum Level of Energy Efficiency Standard Regulations
NMAP	New Measures and Products
PAS	Publicly Available Specification
PCID	Post Retrofit Customer and Installer Declaration
PICI	Post Installation Customer and Installer form
PPS	Partial Project Score
PRS	Private rented sector
RdSAP	Reduced Data Standard Assessment Procedure
SAA	Scottish Assessor’s Association
SAP	Standard Assessment Procedure
SAP rating	Numerical value normally between 1 and 100 based on calculated energy costs for the premises.
TMLP	TrustMark Licence Plus

**Decision** – Ofgem’s Administration consultation decision: Great British Insulation Scheme and ECO4 Amendment

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UK	United Kingdom
VOA	Valuation Office Agency
WHD	Warm Home Discount