

Decision

Consultation decision on administration of mid-scheme changes to ECO4 and GBIS

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Following a government mid-scheme consultation, legislation has been laid to introduce some changes to the ECO4 and Great British Insulation Scheme (GBIS) schemes.

A consultation on Ofgem's proposed administration of mid-scheme changes to ECO4 and GBIS closed on 13 May 2025, and this document confirms our final approach.

In this document we summarise the responses received to our consultation on our administration of the mid scheme changes, 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 ECO4 and GBIS mid-scheme changes, this document considers the responses we received and sets out our final approach. This document is not intended to provide full details of the mid-scheme changes or to provide full guidance. We published draft guidance alongside our consultation, and final guidance will be published in due course.

What we consulted on

The Department for Energy Security and Net Zero (DESNZ) published a government response to their mid-scheme consultation on 7 April 2025. Amongst the changes to the schemes are a suite of amendments designed to increase GBIS delivery, and minor changes to installation standards and eligible measures in both schemes.

Having immediately consulted on how we propose to administer the mid-scheme changes,¹ we have now considered consultation responses. This document summarises responses and details our final planned approach to administering these changes.

DESNZ published a clarification on 12 June 2025² which referred to two points stated within the government response, regarding GBIS annual targets and the rural area definition. These clarifications are taken into account within this document.

Our role

Ofgem is the scheme administrator of ECO4 and GBIS, and our consultation related to *administration* of the mid-scheme changes. Policy for the scheme is defined by legislation within the remit of DESNZ, which published its own consultation on the mid-scheme changes.

To provide context we have at points summarised government's position. This is not, nor intended to be a full indication of government policy. For a full description of the government's position, readers should refer to the government response and the legislation governing the schemes: the ECO4 Order, the GBIS Order, and the draft 2025 ECO (Amendment) Order, which are all linked to under the 'Context and related publications' section. If you have any queries about the policy itself, please direct these to DESNZ: ecoteam@energysecurity.gov.uk.

¹ [ECO4 and GBIS Mid-Scheme Changes Administration: consultation | Ofgem](#)

² [Clarification on the Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes government response \(published 10 June 2025\) - GOV.UK](#)

Context and related publications

- [Clarification on the Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes government response \(published 10 June 2025\) - GOV.UK](#)
- [The Electricity and Gas \(Energy Company Obligation\) \(Amendment\) Order 2025 \(draft\)](#)
- [ECO4 and GBIS Mid-Scheme Changes Administration: consultation | Ofgem](#)
- [Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes - GOV.UK](#)
- [Design of the Energy Company Obligation ECO4: 2022-2026 - GOV.UK](#)
- [Design of the Energy Company Obligation \(ECO\): 2023-2026 - GOV.UK](#)
- [Ofgem ECO4 Administration Consultation Part 1 | Ofgem](#)
- [Ofgem ECO4 Administration Consultation Part 2 | Ofgem](#)
- [Ofgem ECO4 Administration Consultation Part 1 and 2 Decision | Ofgem](#)
- [Great British Insulation Scheme and ECO4 Amendment Administration Consultation | Ofgem](#)
- [Great British Insulation Scheme and ECO4 Amendment Administration Consultation Decision | Ofgem](#)
- [The Electricity and Gas \(Energy Company Obligation\) Order 2022 \(or the 'ECO4 Order'\)](#)
- [The Electricity and Gas \(Energy Company Obligation\) Order 2023 \(or the 'GBIS Order'\)](#)
- [Boiler Plus Standard government response](#)

Our decision-making process

We worked closely with DESNZ ahead of publishing our consultation so that the consultation process for our administration of the ECO4 and GBIS mid-scheme changes could open as soon as possible after the government response.

We received 18 responses to the consultation in total from a range of stakeholders including from 9 suppliers, 5 installers and 4 from related industry bodies and consumers. All responses were collated, and views were considered. Decisions were made collectively on all the question areas. A list of the respondents who were comfortable being named can be found in Appendix 1.

All general feedback has been fully considered, and where relevant incorporated into our responses. In developing our final policy, we carefully considered all the points raised by respondents, even if they are not specifically mentioned within this document.

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Decision-making stages

Date	Stage description
07/04/2025	Stage 1: Consultation open
12/05/2025	Stage 2: Deadline for responses, consultation closed
26/06/2025	Stage 3: Consultation decision published

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 would also like to get your answers to these questions:

- Do you have any comments about the overall quality of this document?
- Do you have any comments about its tone and content?
- Was it easy to read and understand? Or could it have been better written?
- Are its conclusions balanced?
- Did it make reasoned recommendations?
- Any further comments
- Please send any general feedback comments to ECO@ofgem.gov.uk.

2. Deliverability

Section summary

This chapter provides confirmation of our administrative approach to deliverability in GBIS.

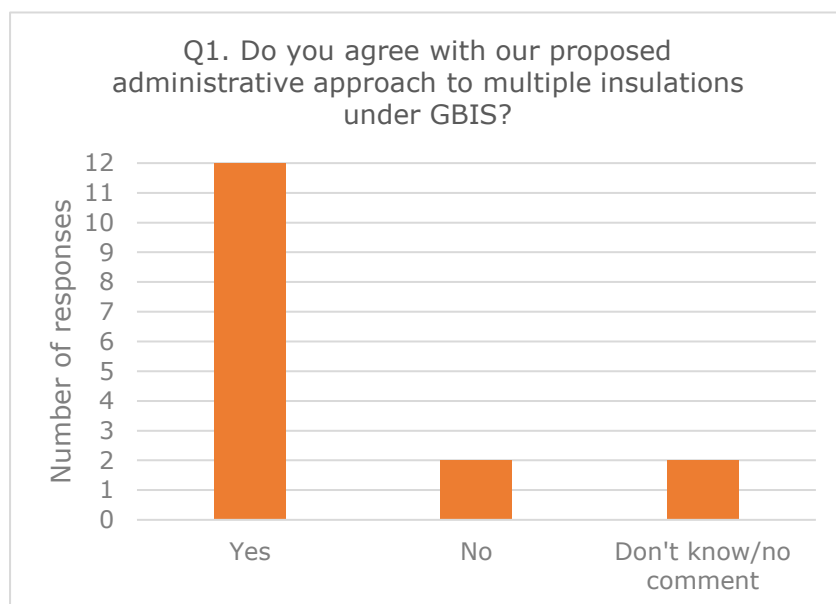
Questions

- Q1. Do you agree with our proposed administrative approach to multiple insulations under GBIS?
- Q2. Do you agree with our proposed administrative approach to the notification of smart thermostats on GBIS?
- Q3. Do you agree that May/June 2025 is a feasible deadline to be able to provide a realistic plan of what, if any, ECO4 annual bill savings (ABS) you intend to reassign to GBIS?
- Q4. Do you agree that suppliers should request the total ABS/ECO4 delivery that they want to be reassigned to GBIS by 31 July 2026?
- Q5. Do you agree with our proposed approach to reporting before and after ABS has been reassigned?

Loft and cavity wall in the same GBIS project

Question 1.

Do you agree with our proposed administrative approach to multiple insulations under GBIS?



Summary of responses

- 2.1 There were 16 responses in total, 12 of which agreed with the approach. For those that agreed, it was suggested that multiple insulations under GBIS allowed for more properties to be treated, along with bringing benefits to consumers through annual bill savings (ABS) achieved through fabric improvements.
- 2.2 Regarding our proposals for the GBIS register, one respondent suggested implementing a new project reference number field, as using the TrustMark identifier would require all measures within the retrofit to be updated after any re-lodgement with TrustMark. Two respondents had concerns over extension requests creating an additional burden on administration for suppliers, with a suggestion to allow immediate notifications as with smart thermostats. Another respondent raised a general concern around the readiness of the GBIS Register to process secondary insulation after legislation coming into force, noting that any register issues could delay processing times.
- 2.3 Two respondents mentioned that they would like DESNZ to ensure access to the duplicate tracker is expanded beyond suppliers to the wider supply chain, to help avoid delivering measures to ineligible properties. Two respondents felt the decision that a single supplier must promote both measures went against the policy intent of increasing GBIS delivery and raised that this was inconsistent with DESNZ communications on this topic.
- 2.4 Requests for clarity and further guidance were raised around several areas:
- adding a second insulation measure to recently completed projects
 - whether multiple floor insulation measures may be installed alongside secondary insulation
 - details of the closedown process
 - completing notification change requests to switch the associated insulation measure
 - how the submission and tracking of transfer requests may be impacted.

Ofgem response & final administrative approach

- 2.5 We will implement the proposals as outlined in our administration consultation. By minimising changes to the GBIS register and internal processes, we expect the register to be ready to accept and approve secondary insulation measures as soon as the (amended) Order comes into force.

- 2.6 Following this approach, we will be using an existing field [TrustMark project reference number] on the notification template rather than introducing a new one as modifying the template carries a high administrative burden for both us and suppliers, for little benefit. Similarly, the approach used for smart thermostats is unsuitable here as secondary insulation is defined by the presence of primary insulation making it difficult to identify in certain circumstances, for example where the secondary insulation is notified alone. Identifying and removing secondary insulation measures from processing rounds would be a complex solution and would result in delays to approvals. Therefore, we believe asking suppliers to delay notification until the amendment comes into force will carry less administrative burden.
- 2.7 We acknowledge that the proposed approach (extension request, updating notifications after TrustMark re-lodgements, etc.) creates administrative burden for both suppliers and Ofgem, but believe this approach will ensure rapid processing of secondary insulation.
- 2.8 We recognise the potential benefits of expanding the use of the duplicates checker, with restrictions to avoid misuse and ensure data protection. We are currently exploring the best way forward in this area with DESNZ.
- 2.9 It is a legislated requirement that secondary insulation must be promoted by the same supplier as the first insulation measure. This is consistent with the approach to heating controls, and more widely with ECO4 where a project notification cannot be split across suppliers. While we acknowledge that this was not explicitly stated in previous communications, this is how ECO schemes function generally, and we do not believe there was any understanding that splitting retrofits would be possible and changing this would be a significant departure from the norm. It would also create significant administrative complexity for both Ofgem and suppliers, as well as increased fixed costs on the scheme. A second insulation measure promoted by a different supplier from the first will be ineligible and face rejection.
- 2.10 Government's consultation and response stated that both insulation measures must take place in the same retrofit. Returning to already completed retrofits goes against policy and is therefore not permissible.
- 2.11 There are circumstances where a single insulation measure is notified as two measures for administrative purposes, such as loft insulation (LI) with different depth. However, floor insulation is not one of these. Solid floor and underfloor insulation are treated as separate measure types, and it was not possible for

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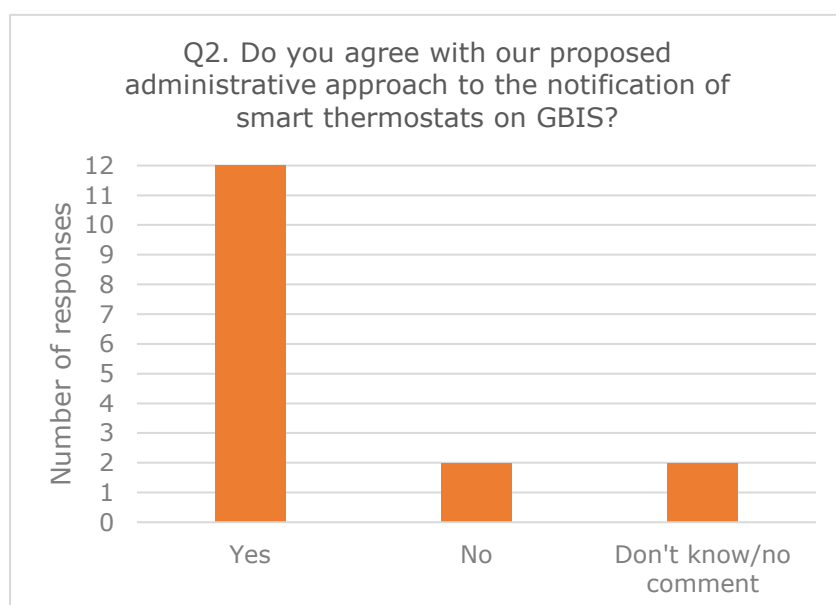
both to be valid GBIS measures in the same property. From 14 November 2024 they can both be installed together, but a third insulation measure could not (see 5.42 in our GBIS delivery guidance (v1.1) for more detail on floor insulation measures).

- 2.12 Our Compliance team will maintain close contact with all suppliers in the lead up to, and throughout, the closedown process. They will also produce guidance on trading and transfers that can be made available to suppliers upon request, outlining how to submit transfer requests and the transfer 'journey' itself.
- 2.13 Cases where an insulation measure has been rejected, and an associated heating measure may remain eligible due to the presence of a second (valid) insulation measure in the same retrofit project will be signposted to suppliers as part of the communication from the notification changes process. Ofgem's Compliance team will also produce communications on how to raise notifications change requests for these in practice.

Smart thermostats

Question 2.

Do you agree with our proposed administrative approach to the notification of smart thermostats on GBIS?



Summary of responses

- 2.14 There were 16 responses in total, 12 of which agree with Ofgem's proposed administrative approach.
- 2.15 Two respondents requested clarity on when the register will be updated to allow notification of the new measure, and preferred to hold notification of all relevant programme and room thermostat (P&RT) and smart thermostat measures until the register is live, at which point the extension request would be made.
- 2.16 One respondent stated that they were concerned that measures will not be processed until the amended legislation is in place, and that any delay in processing these may result in a backlog. In such circumstances, they were of the view that the supplier should not be penalised for the delays.
- 2.17 Two respondents stated that there could be some confusion around the requirement to notify P&RT and smart thermostat where P&RT was not present at the start of the project, but where only smart thermostats are installed. Clear guidance from Ofgem was requested.
- 2.18 Some responses expressed support for this policy decision by DESNZ, although they highlighted that uncertainty around when measures can be notified was problematic for the industry.
- 2.19 One response referred to Ofgem allowing a change request for heating controls where an insulation measure is rejected but a second insulation measure is valid. This response did not relate to Question 2.
- 2.20 One response highlighted the need for Ofgem and TrustMark's administrative processes to be aligned.

Ofgem response & final administrative approach

- 2.21 To notify smart thermostats, suppliers must follow the process outlined within the administration consultation. The register changes to enable the notification of smart thermostats is live at the time of publication and stakeholders have been informed. As such, suppliers are now able to notify the measure to Ofgem. As set out in the administration consultation, measures will remain with 'On Hold' status until the legislative changes come into effect. At this point, they will be processed. As set out in the Government Response, only smart thermostats completed on or after 14 November 2024 are eligible to be notified as smart thermostat measures.

Decision – Consultation decision on administration of mid-scheme changes to ECO4 and GBIS

- 2.22 Suppliers are entitled to hold smart thermostat measure notifications and notify in a single batch with an extension request once the register change is live, if this is preferable.
- 2.23 Smart thermostats are recognised in Standard Assessment Procedure (SAP) 10.2 if the product is listed in the relevant version of the Product Characteristics Database (PCDB), as specified in section 9.4.20.³ However, under SAP 2012, smart thermostats do not produce a SAP saving and therefore in ECO4 where smart thermostats were an eligible measure, they were awarded a Standard Alternative Methodology (SAM) score. The definition used under ECO4 for a smart thermostat was aligned with the Boiler Plus Standard.⁴ Unfortunately, this scoring mechanism could not be carried over to GBIS as the scheme does not allow the SAM route. In order to reduce any adverse impacts on the supply chain in relation to installations that have already been planned, we intend to adopt the following approach:
- Where the pre-retrofit RdSAP assessment uses RdSAP2012, smart thermostats may be notified that meet the criteria set out in the Boiler Plus Standard, requiring them to incorporate automation and optimisation in addition to some form of wider connectivity to enable remote control of the central heating system.
 - Where the pre-retrofit RdSAP assessment uses RdSAP10, smart thermostats will only be eligible for a score where the specific product is listed in the PCDB for use with the heat source of the home where it is installed.
- 2.24 This mirrors the approach that we intend to take with respect to the installation and notification of smart thermostats on ECO4.
- 2.25 We understand there may be some confusion around the existing process for notifying smart thermostats where P&RT are not present before the project starts. We do not propose to make alterations to the scores and will require the same notification process to take place as set out in the administration consultation and on the ECO4 scheme. This will be clearly outlined in guidance.

³ See [SAP 10.2](#), published by BRE

⁴ See Boiler Plus Standard government response in Context and related publications

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- 2.26 We will liaise with TrustMark to ensure that our combined administrative approaches enable the notification of the new measure type without undue mismatches.

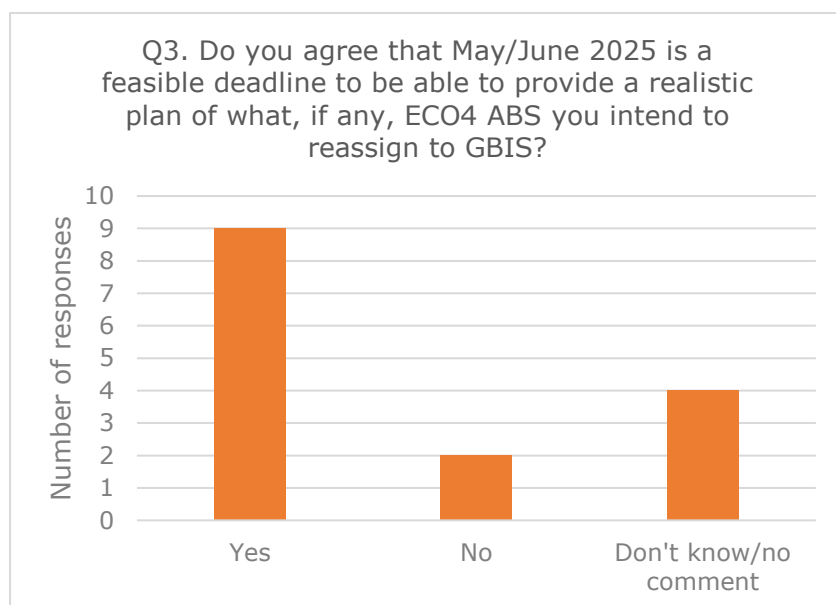
ECO4 counting towards the GBIS obligation

Update on policy

- 2.27 Our consultation document indicated, as set out within the government response, that Government will be removing GBIS annual targets. Following further consideration, DESNZ have since clarified that annual targets will not be removed.⁵ Suppliers may still reassign ECO4 ABS to GBIS regardless of the phase within which it was delivered. Any ECO4 ABS reassigned to GBIS will contribute to a supplier's overall total home-heating cost reduction obligation and total low-income minimum requirement, and not to any specific GBIS phase. Our guidance documents will be updated accordingly.

Question 3.

Do you agree that May/June 2025 is a feasible deadline to be able to provide a realistic plan of what, if any, ECO4 ABS you intend to reassign to GBIS?



Summary of responses

- 2.28 There were 15 responses in total to this question, 9 of which agreed with the proposed approach. Of the respondents that agreed, 3 indicated that this was on

⁵ [Clarification on the Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes government response \(published 10 June 2025\) - GOV.UK](#)

the basis that the indication would not be binding, recognising that this position might change due to, as an example, any introduction of carry-over rules and decisions made later on relating to supplier transfers.

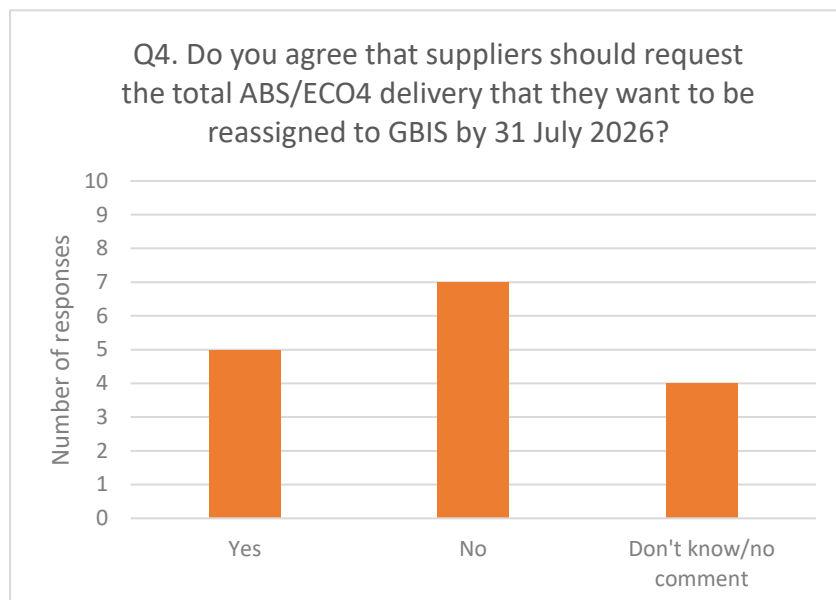
- 2.29 Two respondents indicated that they disagreed with the proposed approach. One respondent who disagreed indicated that May was not feasible, while June was workable, with some provisos that it was non-binding and that guidance was provided. The other who disagreed proposed September as a more feasible timeframe, given that the amended legislation would already be in force, providing enough time to plan.
- 2.30 Other points mentioned by respondents included the need for suppliers to be aware of any eligibility criteria relevant to reassignment, the level of detail needed within the plan, what the template would be, and any associated final guidance being provided with sufficient time ahead of the deadline.

Ofgem response & final administrative approach

- 2.31 Following further consideration, we now plan to ask suppliers to provide an indication of what (if any) ECO4 delivery they propose to reassign to the GBIS obligation after July 2025 rather than May/June. Other than then a delay to this date, we will proceed as planned.
- 2.32 While the responses provided to us will not be binding, there will be a requirement for suppliers to provide an accurate indication of what plans they have made to meet their obligation. This is to enable us to gain assurance of whether suppliers are on track. We appreciate this will be a forecast, and that this might change dependent on further clarifications from government on end-of-scheme arrangements and whether these might be similar to previous schemes involving surplus actions, carry-over or carry-under.
- 2.33 We will provide guidance within the request for information (RFI) on how to complete it.
- 2.34 The RFI will be in a similar format to previous RFIs and will ask for both quantitative and qualitative data. The RFI will set out the level of detail we need from suppliers.

Question 4.

Do you agree that suppliers should request the total ABS/ECO4 delivery that they want to be reassigned to GBIS by 31 July 2026?



Summary of responses

- 2.35 There were 16 responses in total to this question, 5 of which agreed with the proposed approach. Of those who agreed, one respondent stated this was on the basis that information about any new scheme, post-2026, was communicated to suppliers before this (final) reassignment deadline. Another respondent agreed that the deadline was practical as it gives suppliers time to respond to delivery challenges. One respondent agreed on the basis that reassigned volume could not be rejected, and if it could, there should be a mechanism to replace lost volume. The respondent also flagged the interaction between intra-supplier trades and transfers and the reassignment of ABS.
- 2.36 Seven respondents disagreed with the proposed approach. Those who disagreed suggested pushing the deadline to August, September, or even after final determination to allow suppliers to account for rejections before reassignment. One respondent suggested postponing the GBIS final determination until after the ECO4 final determination.
- 2.37 Four respondents requested clarity on potential carry-over arrangements of surplus ABS into a future scheme.
- 2.38 Multiple respondents requested flexibility in Ofgem being able to move any remaining excess ABS between obligations where a supplier under- or over-

reassigns. One respondent suggested that if the date is fixed, suppliers could state their intention to reassign enough delivery to be compliant with their GBIS obligation, rather than specify a fixed amount to be transferred.

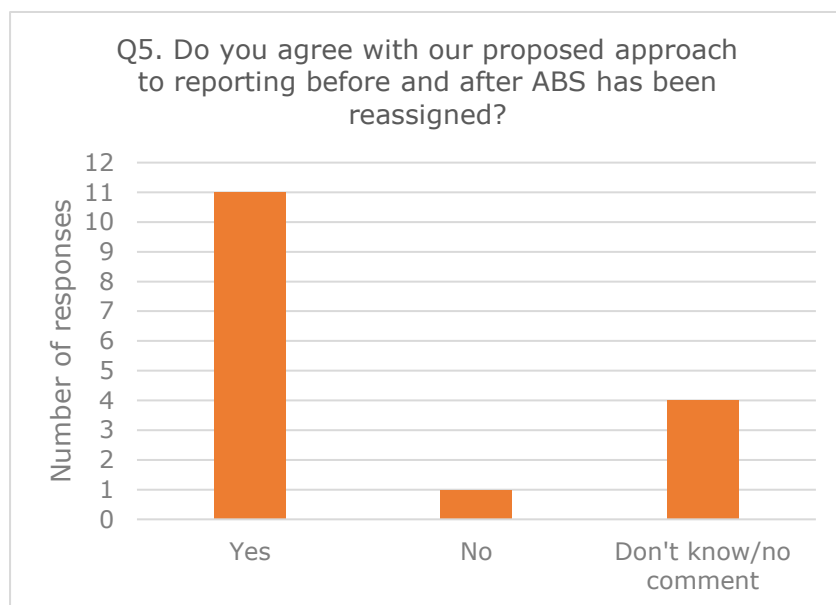
Ofgem response and final administrative approach

- 2.39 We will proceed as planned with a deadline of 31 July 2026 for suppliers to confirm the amount and officially request to Ofgem the ECO4 ABS they wish to reassign to GBIS. This date has been set in legislation.⁶ GBIS qualifying actions must be completed before 1 April 2026, leaving over 3 months for suppliers to consider the level of shortfall (under GBIS) to prepare for the reassignment deadline, factoring in the potential risk of rejection(s). Similarly, the dates of final determination for the schemes are set in the legislation and we will not be deviating from them.
- 2.40 Given that the transfers deadline is a month before the reassignment deadline, our intention will be to action transfers before reassignment takes place.
- 2.41 At present, we cannot comment on carry-over or surplus actions as government has not yet confirmed a future scheme, or whether carry-over/under would be permitted. Provided government announcements are made in sufficient time, the July reassignment deadline would still allow suppliers to consider any interaction with future schemes.
- 2.42 All rejections will be dealt with, and scores deducted from, their source scheme. This means that where a supplier reassigns ABS from ECO4 to GBIS, and then has ECO4 project or measure rejections, this will be taken off ECO4 delivery. Therefore, suppliers should factor in this risk of rejection into their ECO4 delivery plans. Similarly, any GBIS delivery that is rejected will continue to be deducted from GBIS regardless of whether any ECO4 delivery has been reassigned. Applications received after the reassignment deadline will not be considered.

⁶ See article 34A(6)(a): [The Electricity and Gas \(Energy Company Obligation\) \(Amendment\) Order 2025 \(draft\)](#)

Question 5.

Do you agree with our proposed approach to reporting before and after ABS has been reassigned?



Summary of responses

- 2.43 There were 16 responses in total to this question, 11 of which agreed with the proposed approach. Those who agreed felt the approach best represented continuity with the current approach to reporting. One of the respondents who agreed requested Ofgem to also provide breakdowns of GBIS and ECO4 delivery, based on reassigned figures, to suppliers in private.
- 2.44 One respondent disagreed with the proposed approach, suggesting as above that it would be beneficial for suppliers to receive breakdowns of delivery, accounting for those reassigned prior to final reporting. This respondent also suggested that progress reporting that existed under ECO3 should be reintroduced, that suppliers should be able to input into how reassigned volumes are represented in final determination reports, and requested clear guidance on applying conversion factors.

Ofgem response and final administrative approach

- 2.45 We will proceed with the proposed approach to continue reporting on both scheme progress as normal, with reassignment of ECO4 delivery to GBIS being reflected within reports following final determination.

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- 2.46 If reporting team capacity allows, we will work with suppliers directly to provide any useful data prior to the final reports, including supplier progress against obligations and usage of caps under both schemes. This information will support suppliers to model their progress, using the appropriate conversion factors, helping them to determine the level of reassignment they may request.

3. Installation Standards

Section summary

This chapter provides confirmation of our administrative approach to installation standards in ECO4 and GBIS.

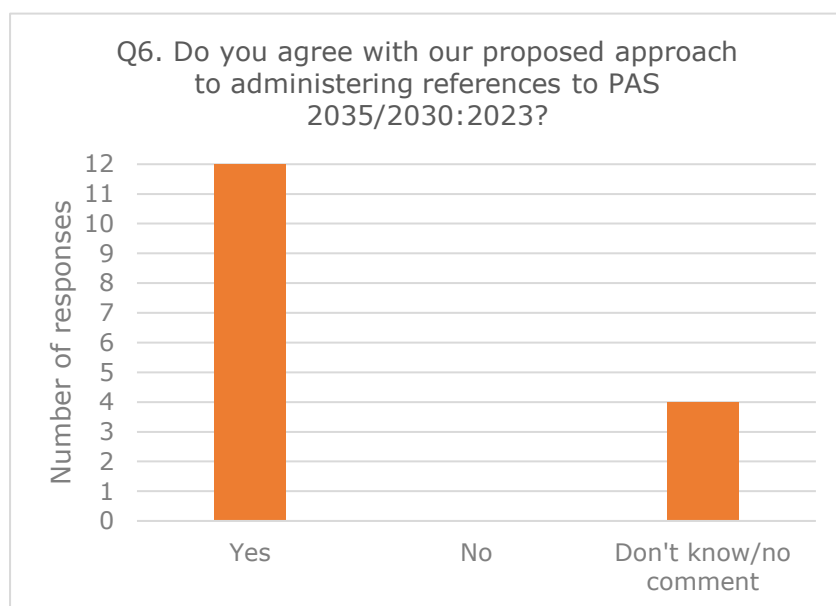
Question

Q6. Do you agree with our proposed approach to administering references to PAS 2035/2030:2023?

References to PAS 2035/2030:2023

Question 6.

Do you agree with our proposed approach to administering references to PAS 2035/2030:2023?



Summary of responses

- 3.1 There were 16 responses in total, 12 of which agreed with the approach.
- 3.2 Two responses reiterated the need for Ofgem documentation to be updated to reflect the new standard.
- 3.3 One response stated that Ofgem must have clear deadlines for the transitional period and guidelines as to how projects which overlap the end of the transition should be treated.

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- 3.4 One response stated that Ofgem must ensure consistent messaging with TrustMark in relation to the interpretation of the new PAS standards.

Ofgem response & final administrative approach

- 3.5 We will proceed with the planned approach to the administration in accordance with the PAS2035:2023 and PAS2030:2023 standards from the end of the transition period on 30 March 2025. We will amend our guidance documents and relevant forms to reflect this approach.
- 3.6 We are not responsible for the transitional arrangements for projects started under the old version of the standards. The transitional arrangements for projects started under the old version of the standards were detailed in an open letter from government.⁷ Measures completed after the end of the transition period must be installed in accordance with the updated standards. Measures completed on or after the coming in to force date must also meet the updated standard.
- 3.7 We are not responsible for the interpretation of the new standards. Where stakeholders are uncertain of the content of the standards, this should be raised with certification bodies and TrustMark.

⁷ [DESNZ Letter on PAS transition arrangements](#)

4. Minor ECO4 and GBIS policy amendments

Section summary

This chapter provides confirmation of our administrative approach to administering minor policy amendments in ECO4 and GBIS.

Questions

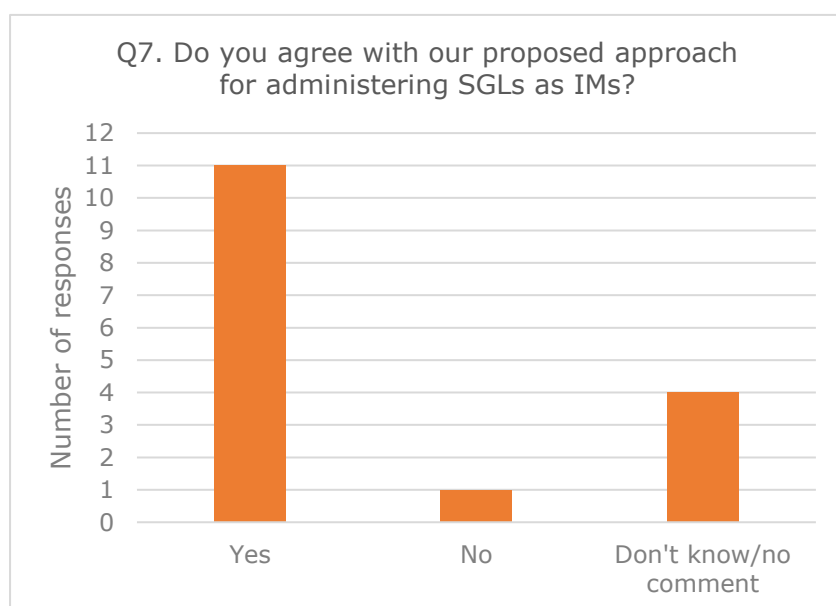
Q7. Do you agree with our proposed approach for administering Shared Ground Loop Ground Source Heat pumps as IMs?

Q8. Do you agree with our proposal for administering the changeover of the rural data sets?

Shared Ground Loop Ground Source Heat Pumps

Question 7.

Do you agree with our proposed approach for administering SGLs as IMs?



Summary of responses

- 4.1 There were 16 responses to this question, 11 of which agreed with our administrative approach.
- 4.2 One response disagreed with the legislative amendment and suggested that Shared Ground Loop GSHPs should not be installed as a retrofit measure due to

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concerns over installation quality. This concern related to Shared Ground Loop GSHPs as a whole and was not specific to innovation measures.

- 4.3 Two responses highlighted the need for clarity in the language used in relation to shared ground loops. They stated that the innovation is more likely to refer to the heat pump rather than the ground loop itself.
- 4.4 Two respondents highlighted the need for the notification process through the ECO4 register to be updated promptly should an innovation measure which is a connection to a district heating system that uses a shared ground loop be approved.
- 4.5 One respondent questioned whether additional administrative checks would be carried out to validate the measures, and whether any additional evidence would be required. Equally they requested clarity on which scoring methodology would be used.
- 4.6 One supplier stated that previously rejected innovation measure applications for Shared Ground Loop GSHPs should be fast tracked.

Ofgem response and final administrative approach

- 4.7 We will update the register in line with the legislation promptly to enable the notification of Shared Ground Loop GSHPs as innovation measures, should one of these measures be approved.
- 4.8 This change will not affect the quality assurance checks carried out on these measures. Additional evidence would be required to be retained by suppliers upon installation should a Shared Ground Loop GSHP measure be approved as an innovation measure, as is the case with all approved innovation measures. These evidence requirements will be published in an innovation measure description on the Ofgem website.⁸
- 4.9 We will carry out the administration of this amendment in line with the existing process and review applications submitted to Ofgem according to the schedule published on the Ofgem website.

⁸ [ECO4 Innovation: New Measures and Products | Ofgem](#)

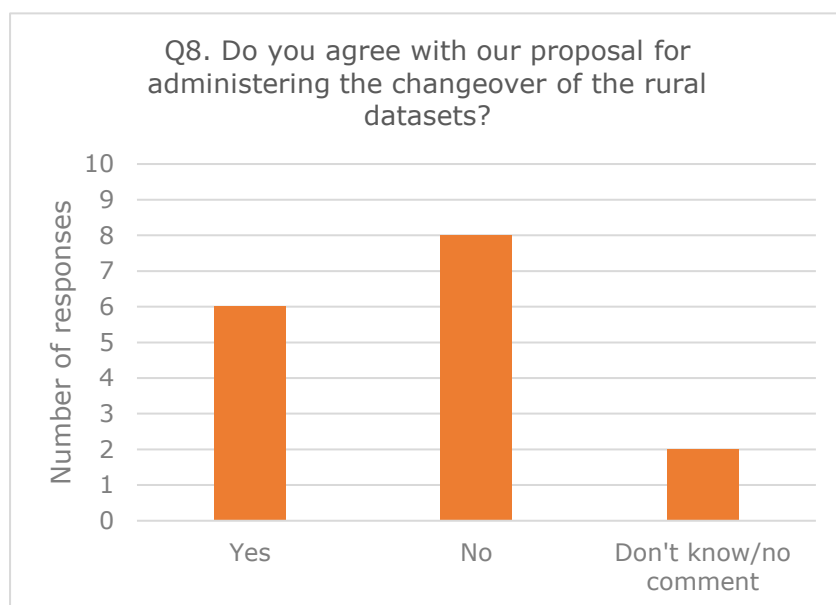
Rural Area Definition

Update on policy

4.10 The ECO4 and GBIS mid-scheme changes government response stated that the transition to updated rural data sets would be based on the point at which 'a project has been completed and notified to Ofgem' (option B in government's consultation). A further clarification was issued by government on 12 June 2025 to reflect the different notification processes in ECO4 and GBIS.⁹ In ECO4, the updated rural data sets will apply to ECO4 projects first notified to Ofgem on or after the day the amending Order comes into force. In GBIS, the amended rural data sets will apply to measures notified to Ofgem on or after the day the amending Order comes into force.

Question 8.

Do you agree with our proposal for administering the changeover of the rural data sets?



Summary of responses

4.11 There were 16 responses to Question 8, 6 of which agreed with our proposed approach to administering rural data sets. Eight respondents disagreed, and two indicated 'don't know/no comment'.

⁹ [Clarification on the Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes government response \(published 10 June 2025\) - GOV.UK](#)

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- 4.12 Of the 6 respondents that agreed with our proposed approach, views included that it was appropriate to use more recent rural classification data sets in ECO4 and GBIS to verify rural status, agreement with the use of notifications to determine the changeover between the two data sets, and agreement that the proposed approach was a clear and practical transition.
- 4.13 Of the 8 respondents that disagreed with our proposed approach, 7 respondents cited disagreement with the planned transition between the data sets being determined by notification date of a project/measure. Five respondents proposed that the handover date of measures would be most appropriate. Reasons given included that this would provide appropriate time if project extensions were required, would avoid problems if measures needed to be renotified to resolve processing errors, and would avoid unfairly penalising installers who had made commercial decisions to proceed with a project without necessarily knowing the notification date of that project. It was also queried whether we were proposing a project's initial notification date be used, or the date of a subsequent later notification. Another respondent that disagreed with the use of notifications proposed that current projects underway before the legislation comes into force should be allowed to be completed using the pre-changeover rural classification.
- 4.14 Another concern, raised by 2 respondents who disagreed with our proposed approach, related to the availability of the new data set ahead of the legislative amendment. It was noted that ONS Postcode Directory data, at the time of responding, did not include 'RUC21IND' information, which is the more recent version of the current rural indicator 'RU11IND'.
- 4.15 One respondent also noted that the classification system had changed between the old and new data sets in England and Wales, meaning the codes used to indicate whether a premises is rural will be different. This meant they were unable to update their systems and processes, and there were concerns this might prompt disruption for delivery partners.
- 4.16 Confirmation was sought that the ONS Postcode Directory would be updated and accessible in advance of the legislative amendment.
- 4.17 Another respondent called for early communication of the go-live date for new data sets to enable suppliers and delivery partners to update their systems and training materials.

Ofgem response & final administrative approach

- 4.18 DESNZ consulted on transitional arrangements and the government response confirmed that the approach would align with our existing processes for checking a property's rural status.
- 4.19 The draft legislative amendment laid on 11 June 2025 requires that the transition between data sets is based on when projects are first notified in ECO4, and when measures are notified in GBIS. Rural ECO4 projects that were identified using the old data sets must be notified to Ofgem before the date on which the amendment legislation comes into force. Similarly, suppliers must notify rural GBIS measures that have been identified using these data sets before this date. The coming into force date is dependent on parliamentary process and will be updated on Parliament's website in due course.¹⁰
- 4.20 Noting suppliers' concerns about timely availability of the updated data sets we have been closely monitoring data publications, and we alerted suppliers with an update by email on 13 June 2025.
- 4.21 The 2021 Rural Urban Classification for England and Wales was published by ONS in March 2025, and the Scottish Urban Rural Classification 2022 was published by the Scottish Government in December 2024.
- 4.22 The ONS Postcode Directory included England and Wales data in May 2025. At the time of publication, the Scottish Urban Rural data was not included in the ONS published products. We understand that this will occur next month.
- 4.23 The 2021 Rural Urban Classification for England and Wales uses 3 simplified categories of urban, larger rural settlements and smaller rural settlements rather than the 6 broader categories of settlement types used in the 2011 Rural Urban Classification.¹¹ As a result there are now 6 classification codes for output areas in England and Wales, 4 of which indicate that a premises is rural (rather than 10 codes, 6 of which indicated that a premises was rural in the 2011 Rural Urban Classification). Our guidance for suppliers will be updated to reflect this. The Scottish Government rural classification system and codes are unchanged between the 2016 and 2022 data sets.

¹⁰ Timeline for the draft amendment Order: [Timeline - SI 2025 - Electricity and Gas \(Energy Company Obligation\) \(Amendment\) Order 2025 - Statutory Instruments - UK Parliament](#)

¹¹ Details of simplified categories under heading 'Output Areas and other smaller area geographies' on ONS website: [2021 Rural Urban Classification - Office for National Statistics](#)

Appendix 1 – List of respondents

- Baxter Kelly
- BidConnecter Ltd
- British Gas Ltd
- E.ON
- Ecotricity
- EDF
- Octopus Energy Ltd
- OVO Energy
- The Installation Assurance Authority Federation

The list above excludes 9 respondents whose responses are being treated as confidential.