

Great British Insulation Scheme Guidance: Supplier Administration

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This guidance sets out Ofgem's procedures for administering the Great British Insulation Scheme, which was established by the Electricity and Gas (Energy Company Obligation) Order 2023 ('ECO4A Order'). This guidance has been updated further to reflect changes introduced by the Electricity and Gas (Energy Company Obligation) (Amendment) Order 2025 and the Electricity and Gas (Energy Company Obligation) (Amendment, Saving and Transitional Provisions) Order 2025. All references to the ECO4A Order in this document are to the ECO4A Order as amended. It places a legal obligation on larger energy suppliers to deliver energy efficiency measures to domestic premises. Each supplier has an overall target based on its share of the domestic energy market in Britain.

The Supplier Administration guidance is aimed mainly at energy suppliers, describing the processes that they and Ofgem follow to meet the requirements of the ECO4A Order. It explains when an energy supplier becomes obligated and how its obligations are set. It also sets out the processes for early delivery of measures, trading obligations, the notification of measures, transfers of qualifying actions, carry under and carry over between Great British Insulation Scheme annual targets and reassignment of ECO4 delivery to the Great British Insulation Scheme.

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About this Guidance

Energy efficiency is a key part of Government policy for reducing the United Kingdom's (UK) greenhouse gas emissions. This policy contributes to the Government's wider commitment to decarbonise and achieve net zero carbon emissions by 2050.

The Energy Company Obligation (ECO), of which the Great British Insulation Scheme forms a part, was first introduced in 2013 and is an energy efficiency scheme for Great Britain. ECO places legal obligations on energy suppliers to deliver energy efficiency measures to domestic premises. It focuses on insulation and heating measures and supports vulnerable consumers. ECO is intended to assist in reducing fuel poverty, reducing carbon emissions, and maintaining security of energy supply.

An obligation was established under the ECO4A Order.¹ This scheme runs alongside ECO4 during this period and is called the Great British Insulation Scheme. The Great British Insulation Scheme commenced on 25 July 2023, and will run until 31 March 2026. It is an addition to the ECO4 Scheme and focuses on the installation of insulation to a wider pool of households in the least energy efficient homes, including those on the lowest incomes and those in lower Council Tax band homes.

Ofgem (the Office of Gas and Electricity Markets) is the administrator of the ECO4 Scheme and the Great British Insulation Scheme. This document provides guidance on how Ofgem ('we', 'our' and 'us' in this document) administers the Scheme, in line with the requirements of the ECO4A Order.² **This guidance applies to all measures installed under the Great British Insulation Scheme from 30 March 2023.**

Under the Scheme, energy suppliers must achieve a total of £55,998,000³ in annual bill savings over the three years of the Scheme. The target is divided between suppliers based on each supplier's relative share of the domestic gas and electricity markets.

¹ Since it was originally made, the ECO4A Order has been amended by the Electricity and Gas (Energy Company Obligation) (Amendment) Order 2025 and the Electricity and Gas (Energy Company Obligation) (Amendment, Saving and Transitional Provisions) Order 2025. All references to the ECO4A Order in this document are to the ECO4A Order as amended

² [The Electricity and Gas \(Energy Company Obligation\) Order 2023](#) (this is the original Order, see also the footnote above in relation to the amending SIs also available at (legislation.gov.uk))

³As set out in the Government's Great British Insulation Scheme Final Impact Assessment published 17 May 2023.

GBIS measures must be completed before 1st April 2026.⁴

To help users of our guidance, we have split it into four separate documents:

- a) **Great British Insulation Scheme Guidance: Delivery⁵** – aimed at suppliers and the broader supply-chain, describing how to deliver measures that are eligible to contribute towards meeting the Scheme targets.
- b) **Great British Insulation Scheme Guidance: Supplier Administration** – aimed mainly at suppliers, describing the processes that suppliers and Ofgem follow to meet the requirements of the ECO4A Order.
- c) **Great British Insulation Scheme and ECO4 Local Authority Administration Guidance⁶** – aimed at Local Authorities and Devolved Administrations, describing how to identify and refer households for the Great British Insulation Scheme Flex Scheme, publish Statements of Intent and submit Declarations.
- d) **ECO4 Guidance: New Measures and Products⁷** – aimed at suppliers and the broader supply chain, describing how to apply for and deliver standard alternative methodologies, “data light” measures, and innovation measures. The Great British Insulation Scheme includes eligible Innovation Measures from within ECO4.

⁴ Suppliers who choose to reassign ECO4 annual bill savings to GBIS must make a request to Ofgem by the 31st July 2026.

⁵ See: <https://www.ofgem.gov.uk/guidance/great-british-insulation-scheme-delivery-guidance>

⁶ See: <https://www.ofgem.gov.uk/guidance/great-british-insulation-scheme-and-eco4-local-authority-administration-guidance>

⁷ See: <https://www.ofgem.gov.uk/publications/energy-company-obligation-2022-26-eco4-guidance-new-measures-and-products>

This guidance (Great British Insulation Scheme Guidance: Supplier Administration) addresses the following:

- when a supplier is obligated under the Great British Insulation Scheme and how its obligations are set
- details of the low-income minimum requirement
- how suppliers notify completed Great British Insulation Scheme measures
- carry over and under, and early delivery of measures
- the application process for trading obligations
- the application process for transfers of measures
- the process for reassigning ECO4 annual bill savings to GBIS
- Calculation of the annual determination, and
- our role as the Great British Insulation Scheme administrator.

Disclaimer

It is the responsibility of each supplier to understand the provisions of the ECO4A Order and how those provisions apply to it. The document is for guidance only and is not a definitive guide to the ECO4A Order and it does not constitute legal advice. Where there is any ambiguity or conflict between the guidance and the ECO4A Order, the ECO4A Order takes precedence. Suppliers and members of the supply chain should seek their own legal and technical advice in relation to their obligations under the ECO4 Orders. A supplier is responsible for ensuring that it, and any member of the supply chain acting on its behalf, complies with the applicable legal requirements and industry standards.

This document does not anticipate every scenario which may arise. If a scenario arises which is not addressed in this guidance, we will adopt an approach consistent with the relevant legislation, in this case the ECO4A Order. Any additional guidance we publish will be available on our website.

Useful Links

[The Electricity and Gas \(Energy Company Obligation\) \(Amendment\) Order 2025](#)

[The Electricity and Gas \(Energy Company Obligation\) Order 2023](#)

[Government response to the Energy Company Obligation \(ECO+: 2023 – 2026\) consultation](#)

[Department of Business, Energy & Industrial Strategy \(BEIS\) ECO+ consultation:
Consultation Stage Impact Assessment](#)

[Great British Insulation Scheme Guidance Delivery](#)

[Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration, and
Great British Insulation Scheme Supplier Data Dictionary](#)

[ECO4 Guidance: New Measures and Products](#)

[Great British Insulation Scheme and ECO4 Guidance for Local Authority Administration, and
Great British Insulation Scheme Supplier Data Dictionary](#)

[The Great British Insulation Scheme forms and tables](#)

[Great British Insulation Scheme and ECO4 Amendment Administration Consultation Decision](#)

[TrustMark Framework](#)

1. Introduction

- 1.1. This chapter details some of the key obligation details and administrative processes involved in the Great British Insulation Scheme.

Updates to this document

- 1.2. This document has been updated to reflect changes following amendments made to the ECO4A Order in 2025, as well as general formatting and drafting improvements.
- 1.3. For further details on the updates contained in this version, see the Summary of Updates. You can find it as a subsidiary document at the bottom of the website page hosting this document.

Context and related publications

- 1.4. The Energy Company Obligation (ECO), first introduced in 2013, is an energy efficiency Scheme for Great Britain that places legal obligations on energy suppliers to deliver energy efficiency measures to domestic premises.
- 1.5. A new obligation period was established under the ECO4A Order, and the Scheme that runs during this period is called the Great British Insulation Scheme. The Great British Insulation Scheme continues ECO4's focus on improving the least energy efficient homes.
- 1.6. The overall obligation period for the Great British Insulation Scheme runs from 25 July 2023 to 31 March 2026 and is split into three annual phases. However, Great British Insulation Scheme measures were permitted on a voluntary basis from 30 March to 24 July 2023, known as the early delivery period. Measures delivered in this early delivery period were required to adhere to the ECO4A Order and guidance. Ofgem administers the Scheme in line with the requirements of the ECO4A Order.
- 1.7. The Great British Insulation Scheme broadens the eligibility pool from ECO4 by including two eligibility groups. The first group is the low-income eligibility group which retains most of the eligibility criteria as ECO4, focusing on SAP rated properties D, E, F and G with low-income and vulnerable households. The second group is a general eligibility group that will expand provision to all homes within Council Tax bands A-D in England, A-E in Scotland and Wales. All homes in both low-income and general eligibility groups must have a SAP rating of D, E, F or G.

- 1.8. The target for notional annual bill savings for obligated suppliers, as set out in the consultation stage Impact Assessment⁸ is £55,998,000⁹, is to be achieved by 31 March 2026. This is split into three phases:
- a) Phase A – 25 July 2023, commencement date of parts 1 to 9 of the ECO4A Order – 31 March 2024: £7,280,000¹⁰ (Great British Insulation Scheme measures have been permitted on a voluntary basis from 30 March to 24 July, known as the early delivery period. See Chapter 5 for more information on Early Delivery)
 - b) Phase B - 1 April 2024 – 31 March 2025: £24,359,000
 - c) Phase C - 1 April 2025 – 31 March 2026: £24,359,000
- 1.9. Previous ECO Schemes have required full compliance with the suppliers' target in the final year of delivery, the Great British Insulation Scheme also sets minimum levels of delivery on an annual basis, for each of Phase A and Phase B. A supplier achieves its obligations by promoting qualifying actions ('measures') at domestic premises. Following amendment to the ECO4A Order, suppliers may also achieve 75% of their obligation through reassignment of delivery from ECO4.
- 1.10. A non-exhaustive overview of Ofgem's role as the Scheme administrator and suppliers' roles and responsibilities for the Great British Insulation Scheme is provided in Table 1: Overview of Ofgem and suppliers' roles and responsibilities for the Great British Insulation Scheme.

⁸ Available at <https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>

⁹This figure is from the Government's Great British Insulation Scheme Final Stage Impact Assessment
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1157227/gb-insulation-scheme-final-stage-ia.pdf

¹⁰ This figure is from the Government's Great British Insulation Scheme Final Stage Impact Assessment.

Table 1: Overview of Ofgem and suppliers' roles and responsibilities for the Great British Insulation Scheme

Title	Supplier role and responsibilities	Ofgem role and responsibilities
Before each obligation period begins	<ul style="list-style-type: none"> The customer number for ECO4 will also apply to the Great British Insulation Scheme. Suppliers notified Ofgem of the ECO4 customer numbers and amount of supply by 1 February 2023 for phase 2. We will therefore use the phase 2 data from ECO4 to calculate phase A obligation for the Great British Insulation Scheme. 	<ul style="list-style-type: none"> Determine and notify suppliers of their obligation and sub-obligations in Phase A, outline the processes for early delivery
During obligation period	<ul style="list-style-type: none"> Promote the installation of measures to achieve their obligation and sub-obligations Ensure that relevant measures are lodged in the TrustMark Data Warehouse and completed before notifying to Ofgem Notify Ofgem of completed measures Apply to transfer a notified measure to another licence or supplier Apply to trade obligations to another licence or supplier group Apply for a measure extension request Produce evidence relating to activity undertaken to achieve Scheme obligations (including providing specific information on measures on request) 	<ul style="list-style-type: none"> Notify suppliers whether a measure has been approved or rejected Award Scores Notify the Secretary of State of suppliers' progress towards achieving their obligations (monthly) Review transfer applications for notified measures Review trading applications Review measure notification extension requests Calculate whether a supplier has exceeded its 5% automatic extensions threshold Carry out audits of supplier processes Conduct investigations into suspected cases of fraud

	<ul style="list-style-type: none"> • Perform score and technical monitoring of measures where necessary and report the results to us¹¹ • Adhere to the process steps required for Innovation Measures, including pre-filtering applications to Ofgem where necessary • Suppliers to manage and track their progress of completed or transferred or traded measure to ensure they achieve their targets 	<ul style="list-style-type: none"> • Process Great British Insulation Scheme Flex declarations • Annual target will be set for suppliers based on market shares using same data as ECO4. • Track progress towards annual targets using notified measures. Ofgem will liaise with suppliers regarding their annual targets, however we will not determine whether or not they have met their annual targets until after the full Scheme has ended
End of the obligation period	<ul style="list-style-type: none"> • Achieve obligations (and sub-obligations) for all obligated licences no later than 31 March 2026, unless relying on reassigned annual bill savings (ABS) from ECO4 which must be requested by 31 July 2026 • Apply to reassign ECO4 ABS to GBIS 	<ul style="list-style-type: none"> • Attribute savings to approved measures • Review applications to reassign ABS achieved under ECO4 to contribute towards the achievement of GBIS total obligations • Determine whether a supplier has achieved its obligations • Determine whether or not a supplier has exceeded its caps • Notify the Secretary of State of our final determination • Consider whether to take enforcement action where a supplier has not achieved its HHCRO and low-income

¹¹ Trustmark and Trustmark-licensed scheme providers will undertake a variety of checks to verify compliance with PAS 2030 and 2035 that underpins score and technical monitoring, e.g., relevant checks on RdSAP assessments.

		minimum requirement, 90% of annual targets, or exceeded its caps
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The Great British Insulation Scheme guidance

- 1.11. This guidance details our administrative processes for the Great British Insulation Scheme and sets out the requirements for all obligated suppliers in accordance with the ECO4A Order. Where a supplier fails to meet the requirements of the ECO4A Order, we may take enforcement action. Suppliers should refer to the Great British Insulation Scheme and ECO4 Local Authority Administration Guidance for information on GBIS Flex.

Information gathering powers

- 1.12. We use our information gathering powers under the ECO4A Order to require suppliers to provide us information. We can require a supplier to:
- a) provide specific information about its proposals for complying with any requirement under the ECO4A Order;
 - b) produce specific evidence to demonstrate that it is complying with, or that it has complied with, any requirement under the ECO4A Order;
 - c) and provide information relating to the cost to the supplier of achieving its obligations.
- 1.13. The information that suppliers must be able to provide at audit, based on the requirements set out in this guidance, is detailed in Appendix 1 – Documents and data to be made available on request. This appendix provides full details of the specific data and documents that must be made available.

Personal Data

- 1.14. Ofgem will process all personal data collected in accordance with the assimilated EU law version of the General Data Protection Regulation 2016/679 (UK GDPR) and the Data Protection Act 2018. Ofgem uses the personal data collected to perform its statutory functions and may share this information with other organisations (such as the Welsh and Scottish governments) in line with Ofgem’s scheme administration functions and duties under the UK GDPR. For more information on how we process

personal data and who we might share it with on the Great British Insulation Scheme please refer to our scheme privacy notice.¹²

Queries and further guidance

- 1.15. For further information on our administration of the Scheme please visit our website.¹³
- 1.16. Energy suppliers with queries about our compliance processes (e.g. notifications, rejections, extensions, trades and transfers etc.) should contact us at ECOGBIS_compliancequeries@ofgem.gov.uk
- 1.17. Suppliers should submit one email per query so we can direct it to the relevant Compliance process team and ensure the most efficient response. The Compliance Process team name should be added to the email subject title (if a broader Compliance query use 'Other'), and the email should state clearly if the query has been submitted already before, or is a further request.
- 1.18. Broader queries about our guidance or the administration of the Scheme should be directed to GBISenquiries@ofgem.gov.uk.
- 1.19. For further information on Trustmark, please refer to: <https://www.trustmark.org.uk/>. Any queries on the TrustMark Framework should be directed to eco@trustmark.org.uk.
- 1.20. Please direct any queries about the ECO4A Order, future changes to the scheme and wider policy to the Department for Energy Security and Net Zero at: ecoteam@energysecurity.gov.uk.

¹² [Great British Insulation Scheme privacy notice | Ofgem](#)

¹³ <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

2. Who is obligated under GBIS?

- 2.1. This chapter explains when a gas or electricity licence-holder will meet the definition of a 'supplier'¹⁴. It also outlines the concepts of a dual licence-holder and a group company and explains when these types of licence-holders will meet the definition of a 'supplier'.

The Obligation Period

- 2.2. The Great British Insulation Scheme obligates larger energy suppliers, mirroring those suppliers obligated under ECO4. If a licence-holder is a participant in relation to an ECO4 phase, they will also be a participant for the equivalent phases for the Great British Insulation Scheme. The obligation period for each licence-holder will vary depending on when that licence-holder becomes obligated under the Great British Insulation Scheme:
- a) where a licence-holder met the definition of a supplier on 31 December 2022 (see below), its overall obligation period starts from Scheme commencement date (25 July 2023) (phase A) and ends on 31 March 2026.
 - b) where a licence-holder does not meet the definition of a supplier until 31 December 2023 (a 'new 2023 supplier'), its overall obligation period starts on 1 April 2024 (phase B) and ends on 31 March 2026
 - c) where a licence-holder does not meet the definition of a supplier until 31 December 2024 (a 'new 2024 supplier') its overall obligation period starts on 1 April 2025 (phase C) and ends on 31 March 2026.

¹⁴ .The use of 'supplier' in this guidance is equivalent to the use of 'participant' in the Order.

When is a licence-holder a 'supplier'?

- 2.3. The ECO4A Order establishes two thresholds beyond which a licence-holder will be considered a 'supplier' for the purposes of ECO4. Suppliers become obligated under the Scheme when they exceed these thresholds for the relevant phase.
- 2.4. Each phase will contain two elements which must be met for a licence-holder to be considered an obligated supplier:
 - a) The number of domestic customers; and
 - b) The amount of energy supplied to domestic customers.
- 2.5. The Government will retain the supplier obligation thresholds at current levels of 150,000 customer accounts and supply volumes of 300GWh/ year electricity and 700 GWh/ year gas. The customer number and supply volume thresholds may be reduced throughout the Great British Insulation Scheme.
- 2.6. Licence-holders will be notified of their obligations for phase A within six weeks of the date of commencement of the ECO4A Order (25 July 2023). For phases B and C, licence-holders will be contacted on or before 7 March prior to the commencement of that phase. Suppliers will be required to meet their annual target in each obligation phase and the overall obligation by 31 March 2026.¹⁵
- 2.7. If a licence-holder is a member of a group of companies that includes at least one other licence-holder, the licence-holder is a 'group company'. The number of domestic customers and the amount of supply of the group of companies will be used to determine whether the obligation threshold is met.
- 2.8. If a company holds both an electricity supply licence and a gas supply licence ('dual licence-holder'), the number of domestic customers for each licence will be considered as distinct and combined to determine whether the threshold is met.
- 2.9. Assuming the customer number threshold has been met, where a dual licence-holder meets the supply volume threshold for:

¹⁵ A customer supplied with electricity and gas by the same licence-holder is counted twice, once in respect of each supply.

- a) both its gas **AND** electricity licences, it will be considered a separate supplier in respect of each supply, or
 - b) either its electricity **OR** gas licence, it will be considered a supplier only in respect of the supply that exceeds the threshold.
- 2.10. Each licence-holder is responsible for determining whether it exceeds the threshold and is therefore a supplier. Licence-holders will need to consider this ahead of each phase of the Great British Insulation Scheme. A licence-holder that does not exceed the threshold for a given year may do so in a subsequent year.
- 2.11. Once a licence-holder has met the definition of a supplier for a given year, it will remain a supplier (ie, subject to the requirements of the Scheme) and will be obligated for all subsequent phases. If the supply is below the threshold for the given phase, then the supplier's obligation will be zero for that phase but will retain any obligations from prior phases.
- 2.12. A licence-holder can use Table 2 to indicate whether it is an obligated supplier for ECO4 phases 2-4 and therefore by default for the Great British Insulation Scheme supplier. A licence-holder should identify which type of licence-holder it is and whether it meets the criteria in each column. A tick indicates where a licence-holder meets the criteria and a cross indicates that a licence holder does not meet the criteria. The final column indicates whether or not, based on the rules set out in Table 2, a licence-holder will be an obligated Great British Insulation Scheme supplier.

Group of companies

- 2.13. Whether a licence-holder is a member of a group company should be determined by reference to the membership of the group of companies on 31 December of the relevant qualification year.¹⁶
- 2.14. A group of companies comprises the holding company and the wholly owned subsidiaries of that holding company. 'Holding company' and 'wholly-owned subsidiary' have the same meaning as in section 1159 of the Companies Act 2006.¹⁷

¹⁶ A group company is a group of companies that includes as members of the group at least two companies that are licence-holders.

¹⁷ See: <http://www.legislation.gov.uk/ukpga/2006/46/section/1159>

- 2.15. If a licence-holder is a group company on **31 December** of a qualification year, the sum of the electricity or gas supplied by that licence-holder between **1 January and 31 December** of that year must be taken into account when determining the group's supply. This is irrespective of whether that licence-holder was a member of the group for the whole of that year.
- 2.16. If a licence-holder is a member of a group of companies and individually exceeds the threshold, then all the other licence-holders in that group that hold a licence of the same type will also meet the definition of a supplier.
- 2.17. When using Table 2, where a licence-holder is a member of a group company, the sum of the customer numbers and supply of all licence-holders in that group company should be used to determine whether a licence-holder is an obligated ECO4 supplier.

Table 2: Summary of when a licence-holder meets the threshold and is considered a supplier for each relevant phase, applicable to both group and non-group companies

Type of licence-holder	Electricity supply licence?	Gas supply licence?	The customer number threshold as per the relevant phase ¹⁸	Electricity Supply threshold to domestic customers as per the relevant phase	Gas Supply threshold to domestic customers as per the relevant phase ¹⁹	ECO4 and the Great British insulation Scheme supplier?
Electricity licence-holder	✓	-	✓	✓	x	✓
Gas licence-holder	-	✓	✓	x	✓	✓
Dual licence-holder Electricity	✓	-	✓	✓	-	✓
Dual licence-holder Gas	-	✓	✓	-	x	x
Dual licence-holder Electricity	✓	-	✓	x	-	x
Dual licence-holder Gas	-	✓	✓	-	✓	✓
Dual licence-holder Electricity	✓	-	✓	✓	-	✓
Dual licence-holder Gas	-	✓	✓	-	✓	✓

¹⁸ This is the number of domestic customers at the end of 31 December of the qualification year.

¹⁹ This is the amount of gas or electricity supplied in the relevant qualification year

- 2.18. It is important to note that the requirements of the ECO4A Order fall on the licence-holder, i.e., not at the group company level. In the remainder of this guidance, we use the word 'supplier' and 'participant' to refer to a licence-holder that is subject to the requirements of the Great British Insulation Scheme.

Supplier allowance mechanism

- 2.19. The supplier allowance exempts gas and electricity supply volumes, up to the supplier allowance amount, from being used to calculate obligations. Obligations will be calculated per unit of supply on volumes in excess of the supplier allowance.
- a) The supply volume thresholds are 300GWh/year electricity and 700GWh/year gas.
 - b) The supplier allowance is 150GWh/year for electricity and 350GWh/year for gas.
- 2.20. Each supplier that exceeds the thresholds will have an obligation that is calculated based on each unit of supply above the supplier allowance.

3. Notifying customer numbers and supply

- 3.1. Great British Insulation Scheme obligated suppliers are the same as those that are obligated by ECO4 for the equivalent phase. There are no additional requirements for suppliers to notify customer numbers and supply these separately for the Great British Insulation Scheme. The information notified for ECO4 will be used to calculate and notify suppliers of their Great British Insulation Scheme obligation, as well as their ECO4 obligation. Great British Insulation Scheme phases and the equivalent ECO4 phases are set out in Table 3 below.

Table 3: Duration of each Great British Insulation Scheme obligation phase and equivalent ECO4 phase

	Start of ECO4A Order (25 July 2023)/ April 2023– March 2024	April 2024 – March 2024	April 2025 – March 2026
Great British Insulation Scheme phase	Phase A (25 July 2023, the commencement date of the ECO4A Order) ²⁰	Phase B	Phase C
Equivalent ECO4 phase	Phase 2 (starts from April 2023)	Phase 3	Phase 4

- 3.2. The guidance below in this section sets out the process for notifying customer numbers and supply for ECO4. Given the ECO4 process for notifying customer numbers and supply is referred to specifically within the Great British Insulation

²⁰ Eligible measures installed between 30 March 2023 and 24 July 2023 will be accepted as part of Phase A. See from paragraph 5.17 onwards for further details of Early Delivery

Scheme legislation, all references below to ECO4 have been retained and align with the ECO4 guidance for notifying customer numbers and supply.

- 3.3. Once a licence-holder or group company has met the definition of a supplier for ECO4 (and is therefore an obligated Great British Insulation Scheme supplier also), it must notify us of its domestic customer numbers and the amount of gas and / or electricity supplied. The information that must be notified to us, and how to calculate this information, is described below. We will use the information notified by a supplier to determine its obligations, including the proportion of the overall Great British Insulation Scheme target that it must achieve.

What suppliers must notify

- 3.4. Before each phase of ECO4, a supplier must notify us of the following information which will be used to confirm both ECO4 and Great British Insulation Scheme obligations:
- a) the number of its domestic customers on 31 December of the relevant qualification year (see Table 4), and
 - b) the amount of gas or electricity (as applicable) supplied to its domestic customers during the relevant qualification year.
- 3.5. This information must be sent to us by a set notification date, using the template that we will email to suppliers before the notification date.
- 3.6. Table 4 summarises the dates by which suppliers must notify us of their domestic customer numbers and supply, and the period of time that notification must relate to – note these are the deadlines for notifying for ECO4 and this information will also be used to confirm Great British Insulation Scheme obligations.

Table 4: Key dates for notifying domestic customer numbers and supply

Actions	ECO4 Phase 2 (1 April 2023 to 31 March 2024)	ECO4 Phase 3 (1 April 2024 to 31 March 2025)	ECO4 Phase 4 (1 April 2025 to 31 March 2026)
Notification deadline	1 February 2023	1 February 2024	1 February 2025
Relevant qualification year	1 January to 31 December 2022	1 January to 31 December 2023	1 January to 31 December 2024

- 3.7. Where a supplier is a group company²¹, it must notify us of the group's customer numbers and the amount of electricity or gas, as applicable, supplied by the group during the relevant qualification year for all licence-holders part of the same group with the same type of supply at the licence level.
- 3.8. In calculating group customer numbers and supply, suppliers should take into account the amount of electricity or gas supplied by the entire group during the qualification year including the supply of any licence-holders that entered the group during that qualification year.
- 3.9. In addition, for all suppliers in the group with the same type of supply (i.e., gas or electricity), the supplier must also notify us of the following:
- a) the names of all the suppliers in the group, and
 - b) the company registration number for each supplier within the group.
- 3.10. Where a supplier that is a group company fails to provide the information specified above, or we consider any of the information to be inaccurate, we may determine the information ourselves. We may also take enforcement action if appropriate.

²¹ A 'group company' is a licence-holder that is a member of a group of companies that includes at least one other licence-holder.

Calculating customer numbers and supply

Calculating domestic customer numbers

- 3.11. The ECO4A Order indicates that if a supplier has been defined as a participant for an ECO4 phase they will also be defined as a participant for the equivalent Great British Insulation Scheme phase. The ECO4 order defines a domestic customer as 'a person living in domestic premises in Great Britain who is supplied with electricity or gas at those premises wholly or mainly for domestic purposes'.²²
- 3.12. We recognise that suppliers may use a variety of different methodologies to calculate their domestic customer numbers. However, suppliers must use a methodology that accurately calculates domestic customer numbers. We may audit suppliers to ensure the methodology used is reasonable after notification but before the start of each phase, as applicable.

Calculating electricity supply

- 3.13. As mentioned above, the ECO4A Order relies on the definition of participants undertaken for the equivalent ECO4 phase, as set out in the ECO4 Order. To calculate the amount of electricity supplied, suppliers should use the methodology below. It is recognised that there may be other adjustments or additions that suppliers feel is necessary to make to the supply volumes computed from Elexon data flows below in order to include all reportable domestic supply volumes. If suppliers wish to deviate from the below methodologies, they will need to provide (1) their reasoning and (2) details of the methodology in advance of notifying the volumes to Ofgem. Any adjustments that are made should also be transparent and substantiated in the reporting, with a clear reconciliation between supply volumes thus calculated and supply volumes reported on relevant settlement report.

Methodology for calculating the amount of electricity supply

- 3.14. In order to maintain a consistent basis of measurement amongst suppliers, Elexon settlement data should be used for all notifications, given its acceptance for settlements data across the industry.

²² Part 1 of the ECO4 Order

- 3.15. Suppliers should provide the total kilowatt hours (kWh) delivered to:
- a) customers on Profile Classes 1 and 2; and
 - b) domestic customers on Profile Class 00.
- 3.16. Suppliers should remove any unmetered supply from this data. This total kWh should be based on the settlement data available from 22 January of the year after the relevant qualification year, split by licence, flow, and provided to suppliers by Elexon.
- 3.17. For customers in Profile Classes 1 and 2, to identify the total kWh for each profile class, Ofgem will accept two different reporting approaches:
- a) D0030 'Aggregated DUoS Report' data
 - b) D0081 'Supplier Half Hourly Demand Report' data
- 3.18. Suppliers can use the D0030 'Aggregated Distribution Use of System Charges (DUoS) Report' data provided to both suppliers and Licenced Distribution System Operators (LDSO). This D0030 flow contains both consumption and losses data, but only consumption data is required, as the ECO4 Order (which the ECO4A Order refers to on this matter for the Great British Insulation Scheme) only requires the volumes which have been delivered to customers. Therefore, no adjustments to line losses need to be made for reporting supply amounts for ECO4 (which will also be used for determining the Great British Insulation Scheme obligations).

D0081 'Supplier Half-Hourly Demand Report' data

- 3.19. The D0081 'Supplier Half-Hourly Demand Report' data does not provide the Profile Class information, so this data flow cannot be used by suppliers that supply to non-domestic premises. The data on the D0081 reports 'corrected consumption' but does include the Grid Supply Point (GSP) Group Correction Factor (GCF). If using the D0081 data suppliers will have to use the GCF to 'uncorrect' the data before adding it up.
- 3.20. For domestic customers in Profile Class 00, to identify the total kWh, Ofgem will accept three different reporting approaches:
- a) D0030 'Aggregated DUoS Report' data
 - b) D0296 'Supplier Balancing Mechanism Unit Report' data
 - c) D0081 'Supplier Half Hourly Demand Report' data

D0030 'Aggregated DUoS Report' data

- 3.21. The D0030 'Aggregated DUoS Report' data contains domestic customer non-half hourly and (elective) half hourly data, however for Profile Class 00 it must be adjusted to factor in line losses. Metering systems should be selected corresponding to any domestic Line Loss Factor Class (LLFC) ID they have defined. The full list of LLFC IDs is accessible from Elexon's Portal.²³ These LLFC IDs can then be used to determine the actual Line Loss Factor values for each relevant LDSO.²⁴

D0296 'Supplier Balancing Mechanism Unit Report'

- 3.22. The D0296 'Supplier Balancing Mechanism Unit Report' data flow is provided to both suppliers and Licensed Distribution System Operators (LDSO). Consumption Component Class (CCC) IDs '42' and '45' should be used to map to the appropriate sub-category of customers, i.e. Measurement Class "F".²⁵

D0081 'Supplier Half-Hourly Demand Report' data

- 3.23. The D0081 data does not provide the Profile Class information but it can be used by suppliers which do not supply energy to non-domestic premises. Please refer to paragraph 3.19 for more information about D0081 data and how it can be used to determine the total kWh of electricity delivered to domestic customers.

Settlement runs

- 3.24. Most suppliers collate their energy supply volumes on a monthly basis and a similar approach has been adopted for ECO4 reporting (which will also be used to determine the Great British Insulation Scheme obligation levels), with the same settlement run type being used for complete months.
- 3.25. When notifying electricity supply on 1 February for the relevant qualification year, suppliers should use the most up to date settlement run available. The table below provides estimates of which report may be available for reporting.

²³ https://www.elexonportal.co.uk/mddviewer/view?cachebust=gmq0y6tfyl&table=LINE_LOSS_FACTOR_CLASSES

²⁴ <https://www.elexonportal.co.uk/svallf/view?cachebust=lnxtr303j8> (Registration required)

²⁵ <https://www.elexonportal.co.uk/svallf/view?cachebust=lnxtr303j8> (Registration required)

Table 5: Settlement runs for reporting on 1 February

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
R3	R3	R3	R3	R3	R3	R2	R2	R2	R1	R1	SF

Calculating electricity supply for Supplier of Last Resort (SoLR)

- 3.26. A SoLR's electricity supply volume should include the electricity supply of the exited supplier from the point in time during the relevant qualification year they took on their customers.

Calculating gas supply

- 3.27. To calculate the amount of gas supply, suppliers should use the methodology below. If suppliers wish to deviate from the below methodology, they will need to provide (1) their reasoning and (2) details of the methodology in advance of notifying the volumes to Ofgem. Any adjustments which are made should also be transparent and substantiated in the reporting.

Methodology for calculating the amount of gas supply

- 3.28. The aggregated Annual Quantity (AQ) is the estimated annual gas consumption of a customer over a year under seasonal normal conditions. AQ's are calculated each AQ calculation month by Xoserve in consultation with Gas Shippers and should be used as an approximation of gas delivered to domestic customers during the qualification year.
- 3.29. A supplier should complete the template, sent by us, to report the aggregated AQ of its domestic customers at the following five points in time, for the relevant qualification year (i.e. 2023, 2024, 2025):
- a) 1 January
 - b) 1 April
 - c) 1 July
 - d) 1 October
 - e) 31 December

- 3.30. The parameter required to be used is the aggregate of values of (rolling) Annual Quantity (AQ) consistent with the definition in the Uniform Network Code Transportation Principal Document Section G Clause 1.6.1.²⁶ Values of Formula Year AQ are not to be used in the calculation of the aggregated AQ.
- 3.31. Suppliers should then calculate the mean of the five aggregated AQ values for a relevant qualification year and include this in the template provided. The mean of the five AQ values is the amount of gas supply we will use for obligation calculations for that supplier.
- 3.32. If any of the five AQ values listed in paragraph 3.29 are not available due to data issues, suppliers can use the nearest earlier available AQ value they have to the relevant date. However, where there has been an increase in customer numbers between the date of the earlier value and the date of the originally requested value, suppliers will need to account for those customers.
- 3.33. For example, if a supplier is not able to use the AQ value as of 1 July we are content for the supplier to use the 30 June AQ value instead but only if there was no increase in customer numbers from 30 June to 1 July.
- 3.34. If there was an increase in customer numbers, the gas supply volume should be calculated following the below methodology:
- 3.35. First, identify the number of new customers (N) acquired between the date of the nearest earlier available AQ value and the date of the AQ value originally requested;

$$N = E - O$$

Where:

'N' is the number of new customers.

'O' is the number of customers as on the date of the nearest earlier available AQ value.

'E' is the number of customers as on the date of the AQ value originally requested.

²⁶ <http://www.gasgovernance.co.uk/TPD>

- 3.36. Next, calculate the average supply per customer (A) as on the date for which AQ data was available and that was most immediately subsequent to the date of the AQ value originally requested;
- 3.37. Finally, multiply that average supply (A) by the number of new customers (N) and add this figure to the nearest earlier available AQ value (V). This new AQ value should be used instead of the missing AQ value (as listed in paragraph 3.29) when calculating the aggregated AQ.

$$\text{New AQ} = (A \times N) + V$$

Where:

'**New AQ**' is new AQ value to be used instead of the missing AQ value (as listed in paragraph 3.29) when calculating the aggregated AQ.

'**A**' is the average supply per customer as on the date for which AQ data was available and that was most immediately subsequent to the date of the AQ value originally requested.

'**N**' is the number of new customers.

'**V**' is the nearest earlier available AQ value.

- 3.38. For example, if a supplier was not able to generate gas supply volume reports between 1 July and 5 July, and there was an increase in customer number between 30 June and 1 July, then the supplier should calculate their gas supply following the below steps:
- Identify the number of new customers from 30 June to 1 July
 - Calculate the average supply per customer as on 6 July
 - Multiply the average supply by the number of new customers and add this figure to the 30 June AQ. This new AQ value should be used instead of the 1 July AQ when calculating the aggregated AQ.

Calculating gas supply for Supplier of Last Resort (SoLR)

- 3.39. A SoLR's gas supply volume should include gas supply of the exited supplier from the point in time during the relevant qualification year they took on their customers.
- 3.40. For example, if Supplier A took on domestic customers of Supplier B on 1 December, then the AQ as of 31 December would be the only AQ date available with Supplier B's customers being on Supplier A supply. In this case Supplier B's gas supply volume should be calculated by using the 31 December AQ figure, divided by days of the year

(365 days in a non-leap year and 366 days in a leap year) and multiplied by the number of days the customers of failed Supplier B have been with SoLR Supplier A during the relevant qualification year (31 days in this example). The Supplier B's AQ value should then be added to the average AQ calculated for Supplier A.

- 3.41. If there is more than one AQ date available, for example, if Supplier A took on customers of Supplier B on 31 January, then only the AQ as of 1 January wouldn't be available with Supplier's B customers being on Supplier A supply. In this case, Supplier B's gas supply volume should be calculated by calculating the AQ mean based on the four AQ dates available (1 April, 1 July, 1 October, 31 December) and then dividing that number by days of the year (365 days in a non-leap year and 366 days in a leap year) and multiplying by the number of days the customers of failed Supplier B have been with SoLR Supplier A. This Supplier B's AQ value should then be added to the average AQ calculated for Supplier A.

Calculating gas and electricity supply when there is a supplier merger or licence acquisition

- 3.42. If a supplier acquires a domestic energy supply licence from another supplier (due to a merger or acquisition) during the relevant qualification year, then the notified domestic energy supply volume should include the amount of energy supplied to domestic customers by both suppliers during the relevant qualification year.
- 3.43. For example, if Supplier A acquired a domestic energy supply licence of Supplier B during 2023, then Supplier A's domestic energy supply volume reported to us in the January/February 2024 submission must include the amount of energy Supplier A and Supplier B supplied to their domestic customers via the relevant licences in 2023.

4. Setting supplier obligations

- 4.1. This chapter explains how we use the information provided by suppliers, as described in Chapter 3, to determine each supplier's obligations.

Obligations for each phase

- 4.2. The Great British Insulation Scheme obliges larger energy suppliers to deliver bill savings for consumers in Great Britain. The overarching obligation-based approach matches the ECO4 Scheme, resulting in the same suppliers being obligated for both Schemes in the corresponding annual phases. The Scheme will run for three years from spring 2023 – March 2026. The overall obligation for the Great British Insulation Scheme is £55,998,000 in notional annual bill savings, which must be achieved by 31 March 2026. This is divided between the three years of the Scheme as follows:
- a) March or April 2023 – March 2024: £7,280,000 ²⁷
 - b) April 2024 – March 2025: £24,359,000
 - c) April 2025 – March 2026: £24,359,000
- 4.3. The Great British Insulation Scheme differs from ECO4 in that it sets annual phase targets with minimum levels of delivery for Phase A and Phase B, in addition to a Scheme level obligation that must be met in full by Scheme end.
- 4.4. Ofgem will determine the supplier's annual target as well as the low-income minimum requirement for each. The obligations set for each phase of the Scheme have the same 90% minimum delivery that will apply to the low-income minimum obligation.
- 4.5. Suppliers will also have a total Scheme target which must be achieved by the end of the Scheme – this will be the total of each of the annual targets.
- 4.6. Ofgem will initially use the notification of measures and any provisionally approved measures (all measures are provisionally approved until scheme end, as they can move out of the approved status because of compliance investigations e.g. Duplicates, Counter Fraud) to monitor suppliers against their mandatory annual

²⁷This figure is from the Great British Insulation Scheme (Formerly ECO+) Final Stage Impact Assessment. See <https://www.gov.uk/government/consultations/design-of-the-energy-company-obligation-eco-2023-2026>

targets. Ofgem will engage with suppliers to mitigate risks and issues where they have difficulties meeting their obligations and if appropriate take compliance action following conclusion of that year.

- 4.7. For annual phases A and B at least 90% of the target must be met through delivery of approved measures. Any annual shortfalls will need to be delivered by Scheme end. Whether annual requirements have been met will ultimately be determined after the full three-year Scheme close down is complete and based on approved measures. Any ABS reassigned from ECO4 will contribute towards a supplier's total target, and not individual annual targets.
- 4.8. The same 90% minimum delivery, based on approved measures, will also apply to the low-income sub-obligation.
- 4.9. Unlimited carry over is allowed where suppliers have exceeded delivery of their annual target. This will apply to both the overall target and the low-income minimum. However, any carry over with flex-eligible households can still only make up to 80% of the next year's low-income minimum target, where if suppliers have over delivered, they are still required to deliver to non-flex low-income households.

Table 6: Overview of the scheme obligation for each obligation phase

Obligation	(Phase / Year) A	(Phase / Year) B	(Phase / Year) C
Home Heating Cost Reduction Obligation	£7,280,000	£24,359,000	£24,359,000
Low-income sub obligation	At least £1,456,000 in annual bill savings	At least £4,871,800 in annual bill savings	At least £4,871,800 in annual bill savings

Determining Supply

- 4.10. As defined in the ECO4A Order, the 'qualifying supply' for a supplier is 300 GWh / year electricity and 700 GWh / year gas respectively.

- 4.11. Suppliers must supply above this in the relevant qualification year to at least 150,000 customers in order to be obligated for a given phase. When we have established which suppliers are obligated, we must calculate what their obligation is.
- 4.12. After we have determined the supplier is obligated, we will calculate their share of the obligation on the basis of the amount of their supply above the supplier allowance (150 GWh / year electricity and 350 GWh / year gas), which is 50% of the supplier obligation threshold.
- 4.13. The determined supply (which is used to calculate a supplier's Great British Insulation Scheme obligation) of electricity or gas supplied by a supplier in a qualification year for each annual target is the amount of electricity or gas notified by the supplier for the qualification year above the allowance thresholds; the same is true for group companies.
- 4.14. For example, if a supplier were to notify that they had supplied 800 GWh of gas during a given phase, their obligated or determined supply would be calculated as $[800-350=450]$ GWh of gas.

Determining the HHCRO and low-income minimum requirement for a supplier that is not a group company

- 4.15. For supplier's obligation for a phase is calculated using the following formula:

$$D \times T_p / T;$$

'D' is—

- for phase A, 3,640,000
- for phase B, 12,179,500
- for phase C, 12,179,500

' T_p ' is the amount of electricity or gas supplied in the relevant qualification year for the equivalent ECO4 phase by the participant and calculated as described under 'Determining supply'.

' T ' is the total amount of electricity or gas (as applicable) supplied in the relevant qualification year for the equivalent ECO4 phase by all suppliers and calculated as

described under 'Determining supply', excluding those suppliers whose obligation for the phase will be zero.

- 4.16. Ofgem determines the supplier's low-income minimum requirement for the obligation phase using the following formula—

$$Hp \times 0.2.$$

"Hp" is the participant's home-heating cost reduction obligation for the Great British Insulation Scheme phase.

Determining the HHCRO and the low-income minimum requirement for a supplier that is a group company

- 4.17. Ofgem determines the supplier's home-heating cost reduction obligation for each phase using the following formula—

$$(D \times Tg / T) \times (Np / Ng)$$

Where:

D" is—

- for phase A, £3,640,000
- for phase B, £12,179,500
- for phase C, £12,179,500

'Tg' is the amount of electricity or gas supplied in the relevant qualification year for the equivalent ECO4 phase by the group of which the participant is a member (the amount of electricity or gas supplied is calculated as described under 'Determining supply').

'T' is the total amount of electricity or gas (as applicable) supplied in the relevant qualification year for the equivalent ECO4 phase by all suppliers and calculated as described under 'Determining supply', excluding those suppliers whose obligation for the phase will be zero.

'Np' is the amount of electricity or gas notified by the participant as supplied in the qualification year for the equivalent ECO4 phase by the participant.

'Ng' is the amount of electricity or gas notified by the participants supplied in the qualification year for the equivalent ECO4 phase by the group of which the participant is a member.

- 4.18. Ofgem determines the supplier's low-income minimum requirement for the obligation phase using the following formula—

$$Hp \times 0.2.$$

'Hp' is the participant's home-heating cost reduction obligation for the Scheme phase.

- 4.19. The delivery of certain measures and the claiming of certain scores are capped under the scheme. These caps comprise the Innovation Measure Cap and the Great British Insulation Scheme Flex Cap.
- 4.20. Both caps are set as a percentage of each supplier's obligation. A supplier's caps will remain proportional to their obligation, including where any obligation trading occurs and, therefore, will change according to any trading a supplier may engage in. The IM (Innovation Measure) cap is applied at scheme level over the three years, but the Flex cap is applied annually. Please see from paragraph 5.6 for more details.
- 4.21. See Appendix 3 in the Great British Insulation Scheme Guidance: Delivery for more information.

5. Carry Over, Carry Under and Early Delivery

Carry Over

- 5.1. Under ECO4, where a supplier achieved savings that exceeded its ECO3 obligations, the supplier could apply to credit these excess measures towards its ECO4 obligations, providing certain criteria were met. The Great British Insulation Scheme carry over operates differently as no analogous scheme precedes it.
- 5.2. In the Great British Insulation Scheme, carry over refers to annual bill savings delivered by a given supplier beyond the minimum required of them for a specific annual target. Carry over therefore can only apply to annual bill savings delivered in year 1 or year 2. Carry over is unlimited, allowing suppliers the option to overdeliver their entire obligations in year 1 and/or year 2, provided year 1 minimum is met; excess annual bill savings would then contribute to year 2 and 3 targets, as appropriate.
- 5.3. A Great British Insulation Scheme carry over measure is one that meets all the following criteria:
 - a) is delivered by the supplier on or after 30 March 2023 and before the end of Phase B, 31 March 2025;
 - b) is delivered in excess of the supplier's annual obligation for either phase A or phase B; and
 - c) is otherwise a Great British Insulation Scheme qualifying action
- 5.4. Suppliers will not be able to carry over measures to any Great British Insulation Scheme annual phase delivered in excess of obligations under ECO4 or its predecessor schemes.
- 5.5. Suppliers will not need to apply to or otherwise notify Ofgem of their intention to carry measures over from either Great British Insulation Scheme phases A or B. This will be calculated at the end of the scheme as part of final determination. Suppliers will be made aware of their progress towards their obligations, sub-obligations, and caps via standard periodical information provision from Ofgem on measure notifications and approvals. Information provision will be provisional and higher level for the first part of the scheme, until full functionality of the Great British Insulation Scheme Register and associated systems is achieved.

Caps

- 5.6. There are three caps in the Great British Insulation Scheme:
- a) Local Authority (LA) and Supplier Flex cap
 - b) Innovation Measure (IM) cap and a
 - c) ECO4 ABS reassignment cap (see paragraph 9.3)
- 5.7. The LA and Supplier Flex cap ('the 80% cap') permits up to 80% of a supplier's low-income sub-obligation for a given annual target to comprise annual bill savings delivered via LA or Supplier Flex. This cap applies annually. As such, any carried over score delivered via LA and Supplier Flex will count towards the low-income sub-obligation. Where any of the carried over amount exceeds the 80% cap, this amount will still count towards the supplier's overall obligation. However, separate to measures delivered to Flex households in the low-income group, the supplier must deliver 4% of the total annual obligation in each Phase to non-Flex low-income group households (this 4% is the remainder of the 20% low-income sub-obligation less the 80% cap). Measures exceeding the 80% cap in Great British Insulation Scheme phases A or B can also be carried over to scheme phases B or C, respectively.
- 5.8. The IM cap prevents no more than 2% of a supplier's total obligation comprising score from IMs with an IM uplift (25% or 45%). However, only IMs delivered to the low-income group can receive an IM uplift. This cap applies at the scheme rather than annual target level; therefore, suppliers may fill the cap in Phase B for the whole scheme regardless of whether this is filled by score that is carried over or not. Suppliers can deliver IMs beyond the IM cap; however the IM uplift will not apply to measures delivered in excess of the cap, in this scenario, suppliers will be able to nominate the measures they would like the uplift to be awarded against, any other uplifts awarded in conjunction to the IM uplift will not count towards the IM cap.
- 5.9. All uplifts will apply to carry over. Any measures that attracted a Great British Insulation Scheme uplift would be carried over with the uplift.
- 5.10. Measures contributing to the Great British Insulation Scheme low-income minimum requirement in Phase A or B will still contribute to that sub-obligation after being carried over to Phase B or C.
- 5.11. Measures associated with either a primary or secondary Great British Insulation Scheme measure must be carried over together.

Carry Under

- 5.12. Carry under for the Great British Insulation Scheme refers to under-delivery against a phase target carried forward to the following period. A supplier is permitted to carry under up to 10% of the annual target in each of phases A and B. No carry under is permitted in phase C as suppliers are expected to meet their full obligations by the end of this phase.
- 5.13. As with each annual target, the low-income sub-obligation can also be carried under by up to 10% of the total low-income sub-obligation in each of phase's A and B.
- 5.14. Caps set maximum rather than minimum requirements, therefore suppliers can choose to deliver in a way that does not contribute to any cap in a given target year.
- 5.15. There are no measure-specific requirements for the Great British Insulation Scheme carry under, provided main scheme measure-specific requirements are adhered to.
- 5.16. Where a supplier under-delivers up to the permitted 10% carry under in phases A or B, delivery in the subsequent phase year will first count towards the carried under amount until this is cleared before counting towards the target for the current phase. Suppliers do not need to notify Ofgem about an intention to carry under up to the permitted amount of its phase obligation to a following phase year. This will be calculated at the end of the scheme as part of final determination.

Early Delivery

- 5.17. The ECO4A Order recognise that measures can be delivered from the publication date of the Great British Insulation Scheme Government Response 30 March 2023. Measures delivered between this date and 25 July 2023 are considered as 'Great British Insulation Scheme Early Delivery Measures'. They will be treated on an equal basis to measures delivered after the ECO4A Order comes into force.
- 5.18. Great British Insulation Scheme Early Delivery Measures must be installed in compliance with scheme rules.
- 5.19. Suppliers do not have to participate in Great British Insulation Scheme Early Delivery.
- 5.20. Ofgem published a suite of draft guidance documents in May 2023. Suppliers should have followed the guidance set out within these draft documents for delivery and notification of Early Delivery measures. However, suppliers relied on this draft guidance at their own risk, as Early Delivery measures that do not comply with the final guidance may be rejected.

- 5.21. Measures completed on or after 30 March 2023 (including Early Delivery Measures) and on or before 31 December 2023, must have been notified by 31 January 2024.
- 5.22. Great British Insulation Scheme Early Delivery will be scored using the ECO4 partial project scores. The actions will count towards any minimums and caps under the Great British Insulation Scheme.
- 5.23. Where a supplier is unable to notify a measure within the notification deadline, they will have the option to apply to Ofgem for an extension to the notification deadline for a completed measure. The application must be in writing and must explain why the extension is being requested. The reason should be supported by evidence.
- 5.24. The 5% lates process will be available for all Great British Insulation Scheme measures delivered in 2023, including Early Delivery Measures, based on the notification deadline of 31 January 2024. More information on the 5% late process can be found in chapter 7.

6. Trading obligations

- 6.1. Suppliers may trade part of their obligations between one another or between their own licences. This chapter explains:
- a) what trading is
 - b) the time period during which a supplier may apply for a trade
 - c) limits on the amount of obligation(s) a supplier can trade
 - d) the evidence we may request from each supplier in order to assess an application
 - e) the process for approving applications to trade obligations and
 - f) the compliance and legal liabilities of the supplier receiving a traded obligation
- 6.2. Only obligated suppliers may take part in trades. In this chapter, Supplier A is the supplier passing on an obligation and Supplier B is the supplier taking on the additional obligation. Where we refer to a supplier we may, depending on the context, also be referring to supplier groups, i.e. groups of related companies which hold more than one licence.

Requirements for trading obligations

- 6.3. A supplier may trade all or part of its obligations (phases A to C inclusive) in relation to the main obligation (total home-heating cost reduction obligation) and the sub-obligation (low-income minimum requirement).
- 6.4. Ofgem administers the trading process. We will only approve trades that meet the following requirements:²⁸
- a) the amount to be traded does not exceed Supplier A's relevant obligation
 - b) The low-income minimum requirement would not exceed HHCRO as a result of the trade
 - c) we are satisfied that the trade is not likely to adversely affect our ability to enforce the requirements placed on Supplier B by the ECO4A Order

²⁸ Article 34 of the ECO4A Order.

- d) supplier B is capable of achieving its new total HHCRO or total low-income minimum requirement

6.5. In making a decision we will always consider each case on its individual merits.

Submitting a trade application

Intra-Supplier Licence Consolidation Trading (ISLCT)

- 6.6. Suppliers can request ISLCT prior to Ofgem setting obligations for each phase. The obligation will be traded to the supplier's largest licence. For ISLCT, an abbreviated process to the normal trading activity will occur, with suppliers opting in during the customer number collection process. For Phase A, we will contact suppliers to ask them if they wish to participate.
- 6.7. Suppliers that wish to do this will receive their obligations showing the post-trade position (i.e. all obligations consolidated onto one licence). The normal trading facility will remain available to suppliers for both intra- and inter-supplier trading.

Normal trading

- 6.8. A supplier may apply to trade an obligation at any time from when the ECO4A order comes into force. For this scheme trading have a deadline for each phase.
- a) Phase A – 31 December 2023
 - b) Phase B – 31 December 2024
 - c) Phase C – 31 December 2025
- 6.9. If a supplier notifies measures against a licence where the obligation is traded away, the supplier that promoted them can submit a separate application to transfer these measures as required. This does not need to happen before the trade.

6.10. There are two types of trading:

- a) **Intra-supplier trading:** A supplier or supplier group may trade obligations between its own licences. For example, it may consolidate all of its obligations onto one licence to reduce the cost and complexity associated with meeting obligations on multiple licences, and
- b) **Inter-supplier trading:** Two suppliers may trade an obligation between one another. The terms of the trade should be agreed between the suppliers.

6.11. In either case an application for approval of a trade must be submitted to us by appropriately authorised representatives of the supplier licence seeking to pass on the obligation and the supplier licence wishing to take on the obligation.

Intra-supplier trading

6.12. As a general rule an obligation can only be traded to a licence with a larger obligation. We consider the size of the obligation for any particular licence to be the obligation allocated as a result of the obligation setting process for the current phase.

6.13. If a supplier or supplier group is consolidating all of its obligations onto one licence through the ISLCT, this must be its licence with the largest original obligation at the point of setting the supplier's current phase of the obligation.

6.14. The trading application must always include confirmation of which licences are involved in the trade, along with the types and amounts of obligations to be traded.

Inter-supplier trading

6.15. Generally, where Supplier B has more than one licence, the obligation must be traded onto the licence with the largest original obligation following obligation setting for the current phase.

6.16. All applications for inter-supplier trading must include:

- a) confirmation of which suppliers and licences are involved in the trade;
- b) which obligations are to be traded;
- c) the amount to be traded; and
- d) the annual turnover of the licence holder that is taking on the obligation (only required to be provided by Supplier B).

- 6.17. Where Supplier B applies to receive an obligation from Supplier A, it must be able to provide evidence to support the application to demonstrate that it is able to deliver the additional obligations. This will generally include but is not exclusive to:
- a) evidence of progress towards its current obligation;
 - b) details of a track record of delivering obligations;
 - c) evidence of completed and contracted activity; and
 - d) a delivery plan for the additional activity.

Approving a trade

- 6.18. We will assess whether the trade meets our requirements in order to inform our decision on whether the trade should be approved or rejected.
- 6.19. In the course of approving a trading application, we may ask a supplier to provide additional information in support of its application.
- 6.20. After assessing an application we will either approve or reject the trade or request additional information in support of the application where we do not have sufficient assurance to either approve or reject a trade.
- 6.21. Applications will generally be processed in the order in which they are received but inter-supplier trades may be prioritised if there is a time-sensitive commercial impact.
- 6.22. Our decision on whether to approve or reject an application to trade may be reached after the trade deadline. Suppliers may also have the opportunity to amend active trade requests after the deadline. What matters is that the application is submitted by the deadline date outlined in paragraph 6.8.
- 6.23. If we determine that a proposed trade does not meet our requirements, then we will reject the application. We will notify both suppliers of this in writing, including any reasons for our decision relating to the relevant party.

Following approval

- 6.24. Following approval of a trade, we will notify the suppliers involved in writing and confirm their new obligations. We will subsequently update our reporting to reflect these changes.
- 6.25. The supplier that has taken on the additional obligation will be wholly responsible for delivery of that obligation. If the supplier fails to deliver the obligation or comply with

any other requirements under the ECO4A Order in relation to the obligation, then this will be considered non-compliance and any associated sanctions may be imposed on the supplier that has taken on the obligation.

- 6.26. A trade in obligation may result in a supplier's caps changing. For example, the innovation cap is calculated as 10% of the low-income minimum requirement. Any change in the low-income minimum requirement after a trade would also cause a change in the innovation cap.

7. Notification of completed measures

- 7.1. For a supplier to achieve its obligations, once measures have been installed they must be notified to us by that supplier. We use the information provided at notification to determine whether we will approve a measure. This chapter explains the following:
- a) When measures must be notified to us
 - b) When measures are considered “complete”
 - c) How measures should be notified
 - d) What information must be notified
 - e) What happens when notifications contain errors
 - f) Our approach to late notifications
 - g) Information processing

When a supplier must notify us of completed measures

- 7.2. Great British Insulation Scheme measures completed on or before 31 December 2023 must be notified on or before 31 January 2024.
- 7.3. All Great British Insulation Scheme measures that are completed after 31 December 2023 must be notified by the end of the month after the month the measure was completed. For example, if a measure is completed in March 2024, its notification deadline is 30 April 2024.
- 7.4. Measures notified beyond these deadlines will be treated as late notifications. If these measures cannot be accommodated by the 5% lates quota, they will not be eligible unless the measure is awarded an extension.
- 7.5. All Great British Insulation Scheme measures must be completed on or before 31 March 2026. Allowing for late notifications (‘auto-lates’ and extensions), the latest a measure can be notified is on or before 30 June 2026.

When is the installation of a measure complete?

- 7.6. The installation of a measure is deemed complete at handover, at which point it must be able to deliver savings at a level expected for that measure. This will normally be the date on which the installer finishes work on the measure.
- 7.7. All measures under this scheme must be installed in accordance with PAS 2030:2023 and PAS 2035:2023, the meaning of handover is defined within these documents.

Broadly it includes, where required, any explanation provided by the installer to the occupant / landlord / client(s) on the safe, efficient operation of the system, as well as any guidance on care and maintenance.

- 7.8. Suppliers must be able to evidence the date on which a measure was completed. The documentation a supplier must be able to make available on request to do this is explained in Appendix 1.

Notifying measures

- 7.9. A measure must be notified using an up-to-date version of the Great British Insulation Scheme measure notification template and in accordance with the formatting prescribed within the data dictionary.²⁹ The data dictionary is a reference tool for completing the notification template.
- 7.10. The Great British Insulation Scheme measure notification template will describe the information that suppliers must include as part of the notification for each completed measure. Suppliers will need to provide this information to us securely through the scheme Register. Only obligated suppliers have access to the Great British Insulation Scheme Register.
- 7.11. We will review each measure that is successfully notified to us and will inform suppliers of our decision to approve or refuse that notification. We may require a supplier to clarify the information notified or provide further information for a notification before we can make this decision.
- 7.12. A significant proportion of validation checks will occur automatically upon notification of a measure. These checks may result in a delay between the upload of a template and its contents appearing on the Register.
- 7.13. These automated checks will occur immediately after or overnight after a notification. We intend to conduct any manual processing of notifications within a reasonable timeframe, usually through monthly processing rounds, but may review as required. Suppliers can use the Great British Insulation Scheme Register to check the status of notifications, including which measures are being processed, which are on hold, and

²⁹ See <https://www.ofgem.gov.uk/publications/great-british-insulation-scheme-supplier-data-dictionary> <https://www.ofgem.gov.uk/environmental-and-social-schemes/great-british-insulation-scheme>

which have been approved or had approval refused or revoked. Suppliers will also be able to view and download notification errors. Our ability to validate and process notifications will depend on the quality and completeness of the information provided at notification.

- 7.14. Measures will be approved on the Great British Insulation Scheme Register once we are satisfied that the information notified is correct, all relevant fields of the notification template are complete, and the eligibility criteria are met for the measure.
- 7.15. Approved measures will have their score counted in the supplier's progress towards their obligations. However, all scores are provisional until Final Determination has been completed at the end of the scheme.
- 7.16. Where a measure does not meet the relevant eligibility criteria we will refuse to approve, or will revoke approval of, that measure. Revocation of one measure may lead to revocation of others in cases where one measure's eligibility is dependent on another's. For example, if measure B was a secondary heating measure and measure A was a primary insulation measure supporting it, then if measure A had its approval revoked measure B would also have approval revoked. Similarly, in-fill measures may lose approval status if one of the supporting primary measures is revoked. Otherwise, measures are independent from one another for eligibility purposes.
- 7.17. All measures may be subject to various compliance checks to ensure the notification contains all the information we require, and that this information meets the requirements of the scheme.

Rejected measures

- 7.18. Measures that are potentially ineligible or non-compliant can be identified through our compliance processes. In some cases, they can also be referred to us by suppliers, other industry parties, or members of the public.
- 7.19. If we have reason to believe a measure is ineligible or non-compliant with the Great British Insulation Scheme rules, we will provide suppliers the opportunity to make the necessary representations. If the supplier fails to do so, we may reject the savings for that measure and will notify the relevant supplier of our intention to refuse or revoke those savings. We will communicate this via a minded-to notice (MTN). This process allows suppliers two weeks to make any final representations. We will consider those representations and determine whether the measure should be rejected from the scheme. If we decide to reject the measure, we will issue a refusal and revocation decision (RRD) notice.

- 7.20. If a measure is identified through the TrustMark Quality Assurance framework as having been non-compliant at the point of notification, it may have approval revoked. In such instances, suppliers are encouraged to rectify the measure. Rectifications will be monitored by TrustMark. Successful rectification may allow measures to be approved. If measures are not rectified or the rectification is unsuccessful, they may be rejected.
- 7.21. If a measure is identified as non-compliant due to an administrative error, for example missing crucial information on a piece of documentation, that will still be considered a compliance failure and must be rectified or be at risk of rejection.
- 7.22. Where a retrofit assessment needs to be performed again for compliance reasons, the timing of this assessment may determine which version of RdSAP needs to be used. See chapter 4 of the GBIS delivery guidance for more details of RdSAP version requirements.
- 7.23. If an occupant or a property was found to be ineligible for the Great British Insulation Scheme in the first place, or in the case of fraud or other scheme abuse, all measures in the property will be rejected.

Information suppliers must include as part of notification

- 7.24. Upon notification to the Great British Insulation Scheme Register, measures undergo core checks. Core checks must be passed for notifications to be accepted onto the Register. If a measure fails a core check, it will not appear on the Register. The notification template will need to be corrected and the upload attempted again. This will be indicated by an error message on the register.
- 7.25. As measures are subject to a notification deadline, this means that if a supplier does not provide the correctly formatted information required to pass core checks by the notification deadline, notification of the measure will be unsuccessful, and the score associated with the measure may be lost. Suppliers may apply for a notification extension request to extend this deadline or have one granted via the automatic extensions route. Please see from paragraph 7.40 for more information on extensions.
- 7.26. The core information required for notification of a measure to succeed is detailed in the supplier data dictionary.

- 7.27. In addition to the core information, suppliers must also provide other information when submitting measures, as detailed in the notification templates and data dictionary. Checks on this additional information will be performed once notifications pass core checks. This additional information must be submitted by the notification deadline.
- 7.28. Failure to provide this additional information will not render that notification unsuccessful, as it will have been accepted onto the Register after passing core checks. However, without this information we are unable to process the measure and it will not be approved until corrections are made by the supplier. These measures may sit in 'notified incomplete' status while awaiting re-notification.
- 7.29. Following the PAS process, an RdSAP assessment of the relevant property must take place before any measure installation commences. This assessment will form the basis of the retrofit and details taken from this assessment are required data in the measure notification, as they determine eligibility and scoring. This assessment must be lodged with TrustMark.
- 7.30. A post-retrofit RdSAP assessment, lodged with TrustMark, must also take place after the installation of any insulation measure is complete. This post-assessment will not be used for scoring purposes.
- 7.31. Compliance with PAS is evidenced through the TrustMark Quality Assurance Framework. The measure covered by PAS should be installed by or under the responsibility of a TrustMark registered installer and have a relevant certificate of lodgement. In circumstances where non-compliance with any of the TrustMark requirements is detected, measures may be rejected.
- 7.32. Although measures must be notified after installation, each measure cannot be approved as a qualifying action until the Certificate of Lodgement for the measure has been issued

Errors in notifications

- 7.33. Before the notification deadline, a supplier may make corrections to a measure notification that it has submitted to us. After the notification deadline, the measure notification may only be corrected with our consent unless it is in a status of "Notified Incomplete". Where the measure is submitted after the notification deadline an extension request may also be required. We will notify the supplier if we identify any errors in notified measures as soon as possible.

- 7.34. It is the responsibility of each supplier to ensure that the information contained in all notifications is true and to manage any third parties involved in the delivery of Great British Insulation Scheme measures. Errors in the notification of a completed measure may lead us to refuse or revoke approval of a measure and may lead to enforcement action. This includes where measures are not accepted or are rejected, and results in any primary measures (eg in-fill) and respective projects subsequently being rejected.
- 7.35. Where we revoke or refuse approval of a measure, we will inform the suppliers through the Great British Insulation Scheme Register. Our decision notice will provide details including the measure reference number and reason for our decision. This should assist suppliers in correcting the issue that prevented approval of the measure where possible.
- 7.36. Revocation of one measure may lead to revocation of others in cases where a measure's eligibility is dependent on another's. For example, if measure B was a secondary heating control and measure A was an insulation measure, then if measure A had its approval revoked measure B would also have approval revoked. However, where one measure is rejected but there is a second eligible insulation measure in the same retrofit, the secondary measures would still be eligible. Similarly, in-fill measures may lose approval status if one of the supporting measures is revoked. Otherwise, measures are independent from one another for eligibility purposes.
- 7.37. Where there is a valid second insulation measure in the same retrofit, the supplier must submit a notification change request and replace the "associated insulation MRN for heating measures" with the MRN of that insulation measure.
- 7.38. In a scenario where a house in-fill measure is supported by three primary measures, and one of those primary measures is rejected, we will not automatically reject the in-fill measure. It will remain as an un-linked in-fill measure that cannot be approved and will not count towards the supplier's obligation. However, the supplier may be able to substitute the rejected primary measure with another that meets all the requirements to support that in-fill measure (i.e. a qualifying measure of the same type installed in a house with the same street name). If this occurs the in-fill measure may be eligible for approval once again.

Notifying late measures

- 7.39. Where a supplier is unable to notify measures before the notification deadline, the measures can still be successfully notified to Ofgem via one of the following two scenarios:
- a) For measures composing a maximum of 5% of the number of measures installed in each month and notified within their notification period, the notification deadline can be automatically extended for up to three months, or
 - b) a supplier can apply for an extension to the notification deadline for measures above the automatic 5%.

Automatic extensions for 5% of measures

- 7.40. For measures completed after 31 December 2023, up to 5% of the number of measures installed in a particular calendar month, and notified on time, can be given an automatic extension of three months to the notification deadline (the automatic 5%). The first 5% of late measures notified to us for a particular calendar month without an extension request are given this automatic extension.
- 7.41. Up to 5% of the number of measures installed in 2023, and notified on time, can be given an automatic extension of three months to the notification deadline (the automatic 5%).
- 7.42. Where the number of late measures without an extension request exceeds the 5% threshold, these measures will be flagged to the supplier who must then submit an accompanying extension request or the measures will be considered for rejection.
- 7.43. Measures submitted as late as part of the 5% quota must be notified with the "Purpose_of_Notification" field on the measure template input as "Automatic Late Extension".

Determining if measures fall within a supplier's 5% automatic extension quota

- 7.44. Below is the formula for determining whether measures fall within a supplier's automatic extension quota for a given notification period. A late measure falls within a supplier's 5% quota if, at the time the measure is notified, the result of the following calculation is less than or equal to 0.05. All delivery in 2023 falls under one quota for this calculation but is calculated per month from 2024 onwards. The calculation is done on a group company level.

$$\frac{A - B}{C}$$

Where:

A is the total number of late measures notified

B is the number of measures included in an approved extension request that were notified after the original deadline but within the agreed extended period.

C is the number of measures which were notified by the supplier on time

- Where a supplier notifies a late measure that is included in an approved extension request, the measure would not be included in the automatic 5% quota for that particular month.

Example

- 7.45. Supplier A notifies 3,000 measures with a notification period of October 2024 on time. This would allow supplier A to notify 150 measures also with a notification period of October 2024 in the following three months (November 2024, December 2024 and January 2025), without needing an extension request.
- 7.46. In November 2024, Supplier A submits 140 measures with a notification period of October 2024. These measures are included in the automatic 5% and processed as normal.
- 7.47. In December 2024, Supplier A submits a further 50 measures with a notification period of October 2024. As these take supplier A over its automatic extension quota, all 50 of these measures are returned to the supplier.
- 7.48. Supplier A then decides which of these 50 measures it wants to include in the automatic 5% (a maximum of 10) and for which it will submit an extension request.

Any subsequent measures notified with a notification deadline of October 2024 will require an extension request.

- 7.49. The 5% calculation of the quota for a notification period is calculated by the Great British Insulation Scheme Register on the first day of the following month e.g the quota for October 2024 will be calculated on 1 November 2024.
- 7.50. Late measures are attributed to the supplier that originally notified the measure and will continue to form part of that supplier's automatic extension quota. Where a supplier accepts a transfer containing late measures without an extension request, these measures will not be included in the receiving supplier's automatic extension quota for relevant notification period. Transferring measures does not affect the automatic extension quota for the original supplier that notified the measure.
- 7.51. The 5% is calculated on a group company level (i.e. not at licence level).
- 7.52. Measures to be included in the automatic 5% must be notified by the earlier of:
 - a) the end of the fourth calendar month after the calendar month the measure was completed, or
 - b) the end of June 2026.

Applications for an extension to the notification deadline

- 7.53. Suppliers can also apply to us for an extension to the notification deadline for a completed measure. The application must be submitted in accordance with the extensions application process, with the reasoning and supporting evidence. A supplier should make an extension request promptly when it first becomes aware that it has failed, or will fail, to notify a measure by the notification deadline.
- 7.54. Once a supplier becomes aware that it has, or will, fail to notify a measure by the notification deadline it should take all reasonable steps to ensure that the measure is notified as soon as possible. It is not guaranteed that an extension request will be approved.
- 7.55. Suppliers seeking an extension should submit an extension request using the 'Application for Extension' template. Any relevant supporting evidence, such as emails, screenshots or other correspondence should be sent to us at the same time as the extension request. We will process extension requests within a reasonable timeframe, where sufficient evidence is provided.

- 7.56. We are not obliged to grant an extension to suppliers, and we will consider each application on an individual basis. We will grant an extension to the notification deadline if a supplier satisfies us that there is a reasonable excuse for failing to notify the measure by the notification deadline. Further information about 'reasonable excuse' is provided below.

Reasons for an extensions request

- 7.57. A reasonable excuse is an unexpected or unusual event that:
- a) is either unforeseeable or beyond the supplier's control, and
 - b) prevents the supplier from notifying a measure by the notification deadline
- 7.58. We will judge the actions of a supplier from the perspective of a prudent supplier exercising reasonable foresight and due diligence and having proper regard for its responsibility under the ECO4A Order.
- 7.59. If a supplier relies on a third party to provide the necessary information to notify a completed measure, the supplier is responsible for ensuring that party carries out its task correctly. We expect the supplier to take reasonable care to explain to the third party what it requires them to do and to set deadlines for the task. We expect the supplier to have processes in place for eliminating or mitigating any risk of the third party failing to carry out its task correctly or within the agreed deadlines. If a supplier does this but fails to submit a notification by the notification deadline because of what the third party did or did not do, the supplier may have a reasonable excuse.
- 7.60. Where similar issues are raised more than once by the supplier as a reason for a delay in a measure's notification, this may not satisfy our requirements for granting an extension. Suppliers are expected to make the necessary updates to their processes to ensure issues are not repeated.
- 7.61. As each extension request is considered on a case-by-case basis, we do not intend to provide an exhaustive list of eligible reasons for extension.

Determining the period of extension

- 7.62. If we are satisfied that an event occurred that gives a supplier reasonable excuse for failing to notify a measure by the notification deadline, we will expect the supplier to take all reasonable steps to submit the notification at the earliest possible time and before the new deadline specified after the application is approved. All measures must be notified on or before 30 June 2026 regardless of any notification extensions.

- 7.63. We will inform the supplier when we have granted an extension request, including the date of the new deadline and the reasons why that date was chosen.

Monthly report to the Secretary of State

- 7.64. One of our duties as the Great British Insulation Scheme administrator is to submit a monthly report to the Secretary of State starting on February 2024.³⁰ These reports will show the progress that suppliers have made towards meeting their obligations.
- 7.65. The reports contain data from the information notified to us by suppliers each month and include information on supplier progress towards achieving their obligations.³¹

Fair and transparent processing

- 7.66. When fulfilling its Great British Insulation Scheme obligations, a supplier may obtain information about the occupant or landlord of the premises. Some of this information will need to be provided to us either as part of notifications or in the course of our audits. In addition, in the course of the transfer of a qualifying action, one supplier will disclose this information to another supplier.
- 7.67. A supplier should ensure that its processing of this information complies with all applicable data protection laws. A supplier should also ensure that any member of the supply chain acting on its behalf complies with the data protection laws.
- 7.68. In particular, it is the responsibility of suppliers to ensure the person who lives at the premises where the scheme measure is delivered knows how and why their information will be processed, including who the information will be disclosed to and for what purpose. This includes telling them that their data will be shared with us.
- 7.69. In general, the UK General Data Protection Regulation (GDPR) requires anyone collecting personal data to give the data subject (ie in the case of the Great British Insulation Scheme, the occupant) a Privacy Notice.
- 7.70. Data must be handled in line with GDPR rules.

³⁰ Article 35(4) of the ECO4A Order; [The Electricity and Gas \(Energy Company Obligation\) Order 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukdsi/2023/0001/eng/schedule-1/1)

³¹ See: <https://www.ofgem.gov.uk/environmental-programmes/eco/contacts-guidance-and-resources/eco-public-reports-and-data>.

- 7.71. So that we are able to process the data that suppliers provide, we require suppliers to provide the occupant or landlord under the scheme with Ofgem's GBIS Privacy Notice. Full details of Ofgem's GBIS Privacy policy can be found on our website.³²
- 7.72. The wording in the Privacy Notice is intended to discharge some of our obligations under the GDPR. It is not intended, and should not be relied on, to discharge suppliers' obligations for that legislation or other data protection laws. Further guidance on what information Privacy Notices should contain can be found on the Information Commissioner's Office website.³³

³² See: [Great British Insulation Scheme privacy notice | Ofgem](https://www.ofgem.gov.uk/publications/eco-privacy-notice)
<https://www.ofgem.gov.uk/publications/eco-privacy-notice>

³³ See: <https://ico.org.uk/>

8. Transfers of measures

- 8.1. This chapter explains how suppliers can transfer measures to other suppliers or to its own obligated licence. For information on how suppliers can reassign ECO4 delivery to their GBIS obligation see chapter 9.
- 8.2. Suppliers can apply to transfer qualifying measures (i.e. completed and approved measures) to another obligated supplier or its own obligated licence in the Great British Insulation Scheme if a measure or a measure and linked measure are transferred together. Ofgem approves the transfer request, and the transfer otherwise meets the conditions set out in ECO4A Order. Great British Insulation Scheme measures will consist of a single measure, or two or more measures where an eligible insulation measure or heating controls are installed.
- 8.3. The deadline for Great British Insulation Scheme measure transfer applications will align with ECO4. At any time on or before 30 June 2026 a supplier may apply to transfer measures to another Great British Insulation Scheme-obligated licence within the same supplier group, called an intra-supplier transfer. A transfer between two different suppliers is called an inter-supplier transfer. Intra-supplier and inter-supplier transfers have different requirements for approval.
- 8.4. The facility to transfer measures allows obligated suppliers the choice to deliver qualifying measures themselves, contract directly for their delivery or procure them from other suppliers.
- 8.5. We have no part in any commercial agreement that is entered into as part of a transfer.
- 8.6. Great British Insulation Scheme measures and ECO4 measures cannot be transferred between schemes.
- 8.7. Following recent amendments to the ECO4A Order, ECO4 ABS achieved by a supplier may be reassigned towards their Great British Insulation Scheme total obligation (see Chapter 9). Suppliers cannot reassign ECO4 ABS directly to be counted towards the Great British Insulation Scheme obligation of another supplier. However, measures transferred between suppliers within ECO4 contribute to the total amount of ECO4 ABS a supplier has available to reassign to GBIS.

Applying for approval to transfer measures

- 8.8. The following requirements apply to both intra-supplier and inter-supplier transfers.
- 8.9. A transfer request will consist of only measures to be transferred. A transfer request cannot contain partial retrofits, only whole retrofits. If a property receives linked Great British Insulation Scheme measures, e.g. in-fill measures, secondary heating, or multiple insulation these must be transferred together.
- 8.10. Where an in-fill measure or the primary measure that supports an in-fill measure is to be transferred, it must be accompanied by all of the in-fill and primary measures. For example, where a supplier requests to transfer a measure installed in the same house as an insulation measure that is supporting an in-fill house, the request would need to contain:
- a) the in-fill project
 - b) every measure notified to that in-fill project
 - c) all three measures that support and are notified to the in-fill retrofit
- 8.11. There is no limit on the number of measures a supplier can seek to transfer in any one application. Nor is there any limit on the number of applications a supplier can make on or before 30 June 2026.

Intra-supplier transfers

- 8.12. For an intra-supplier transfer, measures may be transferred regardless of their status, provided they meet all other requirements. They are not required to be approved by Ofgem.

Inter-supplier transfers

- 8.13. For an inter-supplier transfer, measures must be in an approved, rejected or withdrawn state to be eligible for transfer.

Submitting a transfer application

- 8.14. A supplier should apply for a transfer request within the GBIS register.³⁴

³⁴For guidance about applying for a transfer contact us via email: eco@ofgem.gov.uk.

- 8.15. Suppliers must submit all transfer applications for measures and projects on or before 30 June 2026.
- 8.16. A supplier can withdraw a transfer application at any time before the application is approved by us. If a supplier wants to withdraw an application, they should do so as soon as possible on the GBIS register.

Approving a transfer application

- 8.17. In the course of approving a transfer request, we may ask the supplier(s) to provide additional information in support of their application. If the transfer requested was rejected, we will notify the suppliers in question with the reason for rejecting the application.

Following a transfer

- 8.18. If we approve a transfer request, we will notify the suppliers involved, in writing, on the date on which the application was approved. Once the transfer is complete, the Great British Insulation Scheme Register will show the projects and measures as having been achieved by the supplier to whom they were transferred.
- 8.19. If we do not approve a transfer application, we will notify in writing:
 - a) Supplier A of any reasons for the decision relating to supplier A
 - b) Supplier B of any reasons for the decision relating to supplier B
- 8.20. Once approved, the measures that have been transferred are treated as being provisionally promoted by the supplier to whom they were transferred. Suppliers accept a transfer at their own risk. If, for example, a transferred measure later fails an audit, the supplier to whom the measures were transferred will be responsible for remedying the measure (or it will lose the savings).
- 8.21. The supplier to whom the measures were transferred will need to ensure it can produce the necessary evidence at audit to demonstrate that a transferred measure meets the eligibility criteria for the obligation that the action was credited against.
- 8.22. Suppliers should note that any transfer of personal data from one supplier to another, in the course of a transfer of a measure, will amount to the processing of personal data for the purpose of the UK GDPR. Suppliers should ensure that the transfer of personal data complies with the UK GDPR.

9. Reassigning ECO4 delivery towards GBIS and the two conversion factors

- 9.1. This section explains changes introduced by amendments in 2025 to the ECO4 and ECO4A orders enabling suppliers to reassign ECO4 delivery (subject to a conversion factor) to be counted towards their GBIS total obligations. A second conversion factor was also introduced, boosting the value of GBIS ABS achieved over 25% of a supplier's total GBIS obligation.
- 9.2. Annual bill savings (ABS) an obligated supplier achieves under ECO4 rules may be nominated and reassigned towards a supplier's GBIS total home-heating cost reduction obligation. Any ECO4 delivery that is reassigned will also count towards the GBIS total low-income minimum requirement.
- 9.3. The reassignment of ECO4 delivery is capped. Suppliers must deliver at least 25% of their GBIS total home heating cost reduction obligation through delivery of GBIS measures and may deliver up to 75% of their GBIS total home heating cost reduction obligation through delivery of ECO4 projects.
- 9.4. ECO4 delivery reassigned to GBIS will be subject to a conversion factor of 1.251 (i.e. £1 of ABS delivered through ECO4 will be worth 1.251 ABS in GBIS). GBIS delivery which is over 25% of a supplier's GBIS total home heating cost reduction obligation will be subject to a conversion factor of 1.716 (any ABS achieved over 25% of a supplier's GBIS total home heating cost reduction obligation will be treated as being worth 1.716 ABS towards the GBIS obligation).
- 9.5. ECO4 ABS that is reassigned to GBIS does not have to correspond with delivery within a particular GBIS phase. The reassignment will contribute towards a supplier's total GBIS obligations only, and not any specific GBIS phase(s).

Reassigning ECO4 delivery to GBIS

- 9.6. Reassigned ABS will not be associated with particular measures or projects that have been delivered. Therefore, suppliers will not need to select projects to be reassigned, nor will we need to select projects or measures as part of this process.
- 9.7. There will be two windows in which suppliers will be requested to indicate the amount of ECO4 ABS they intend to reassign to their GBIS total home heating cost reduction obligation, followed by a deadline by which they must confirm the amount of ABS.

- 9.8. The first window will be after July 2025 as part of a wider request for information (RFI) from suppliers. We will ask suppliers how much (if any) ECO4 ABS they intend to reassign to their GBIS total home heating cost reduction obligation through a template with set questions. This will enable us to anticipate suppliers' fulfilment of their ECO4 and GBIS obligations. During a second window planned for November 2025 we will request an update from suppliers on how much ABS they intend to reassign, considering any increase or decrease in delivery rates. We may also ask for additional evidence, such as delivery contracts that are in place.
- 9.9. Suppliers are required to formally request to Ofgem by 31 July 2026 the value (if any) of ABS from ECO4 delivery that they want to be reassigned to GBIS; stating also the converted amount. A template will be provided ahead of the deadline.
- 9.10. We are required to reject an application for reassignment which is not made on or before 31 July 2026.³⁵

Applying the conversion factor to ECO4 delivery reassigned to GBIS

- 9.11. Suppliers are required to track their delivery of ECO4 projects and apply the relevant conversion factor to monitor their progress towards achieving their obligations. When providing us with the final value of ABS they request to reassign, suppliers must provide both the raw value before the conversion factor is applied and the converted amount.

Applying the conversion factor to GBIS delivery over 25%

- 9.12. Suppliers are required to track their delivery of GBIS measures and apply the relevant conversion factor to monitor their progress towards achieving their obligations. We will apply the 1.716 conversion factor to GBIS delivery (through GBIS measures) when assessing whether GBIS total obligations have been met.

Impact on ECO4 and GBIS sub obligations

- 9.13. Any ECO4 delivery reassigned to GBIS, will count towards the GBIS total low-income minimum requirement. A supplier may achieve their GBIS total low-income minimum

³⁵ Article 34A(7) of the ECO4A Order.

requirement through delivery of appropriately targeted GBIS measures,³⁶ through reassigned ECO4 ABS and/or a combination of both.

- 9.14. The reassignment of ABS from ECO4 to GBIS will not impact on a suppliers' progress towards their ECO4 sub-obligations – this will remain the same regardless of whether any ECO4 ABS is reassigned to GBIS.

Compliance action and any rejections relating to reassigned ECO4 delivery

- 9.15. ECO4 delivery must have been achieved under ECO4 rules in order to be reassigned to GBIS. All ECO4 projects will remain subject to ECO4 existing project rules, even if ABS is reassigned to GBIS. Should a project be rejected after ABS has been reassigned, the ABS associated with it will be deducted from a supplier's achievement against their ECO4 obligation.³⁷
- 9.16. As with any other ECO4 delivery, all records must be retained in case of audit or compliance queries for any delivery reassigned towards GBIS. Should compliance action be needed in relation to ECO4 delivery that has been reassigned to count towards GBIS, this will be undertaken following ECO4 scheme rules.

³⁶ See paragraph 3.129 onwards within the GBIS Delivery Guidance for details of the low-income group which mirrors the Help to Heat Group within ECO4.

³⁷ Article 82A(2) of the ECO4 Order

10. End of the overall obligations period

Achieving your obligation

- 10.1. The installation of a measure cannot count towards a supplier's Great British Insulation Scheme obligation unless the installation is completed before 1 April 2026 (ie the end of the overall obligation period) and after 30 March 2023. Suppliers must notify us of all measures completed in March 2026 by the end of April 2026. Any measures which are covered by 'auto-lates' or subject to a notification extension must be notified by the end of June 2026. ABS reassigned from ECO4 under the mechanism set out in chapter 9 will also count towards a supplier's GBIS total obligation. A conversion factor will apply to ABS transferred from the ECO4 scheme and also to GBIS delivery above 25% of a suppliers GBIS obligation (see paragraph 9.4).
- 10.2. Following the end of the overall obligation period, we will determine whether a supplier has met its Great British Insulation Scheme obligations and notify both the supplier and the Secretary of State of our determination, known as our 'final determination'. We will notify all suppliers of our final determination before 1 December 2026.

Ahead of our final determination

- 10.3. Under the ECO4A Order, we must determine whether a supplier has achieved its total obligation, including its Low-income minimum requirement sub-obligation, as well as annual obligations. After the transfer, trading, final notification deadlines, ECO4 ABS reassignment deadlines, and before our final determination, we will carry out a number of compliance checks and processes. These include, but are not limited to, the following:
- a) **Low-income minimum requirement:** As described in Chapter 4, there is a requirement within the Great British Insulation Scheme that at least 20% of each annual target should be delivered to the low-income group. This allows for the further 80% to be delivered to the general eligibility group, or a mix of both groups. ECO4 ABS that has been reassigned will contribute towards the total low-income minimum requirement target.
 - b) **Annual targets:** Suppliers will be monitored on the mandatory annual targets initially using notifications. For Phase A and Phase B, the ECO4A Order will require at least 90% of each phase target to be met through approved measures. The 90% includes measures delivered both through the low-income

group and the general group, including the requirement that at least 90% of the low-income phase target has in itself been met.

- c) GBIS delivery reaching 25%:** Suppliers can use reassigned ABS from ECO4 to meet up to 75% of their GBIS obligation. When approving requests for reassignment, we will undertake checks to ensure that 25% of a supplier's GBIS obligation is fulfilled by GBIS measures first.

Final determination at the end of Phase C

- 10.4. Under the ECO4A Order, there is a requirement for suppliers to achieve their overall obligation as well as mandatory sub-obligations.
- 10.5. Suppliers will be notified of our final determination before 1 December 2026.
- 10.6. Where we determine that a supplier has not met its obligations, we have powers to impose a penalty on that supplier. Please refer to our enforcement guidelines and statement on financial penalties for further information.³⁸

Our final report to the Secretary of State

- 10.7. We must submit a report to the Secretary of State, before 1 December 2026, showing whether suppliers achieved the overall obligation as well as their annual obligation targets.
- 10.8. The final report will contain our final determination of whether suppliers have achieved their obligations.

³⁸See [The Enforcement Guidelines | Ofgem](#) and [Statement of Policy with respect to Financial Penalties and Consumer Redress | Ofgem](#)

11. Appendix 1 – Documents and data to be made available on request

- 11.1. In this appendix we set out the documents and data which a supplier must be able to make available for the purpose of an audit or other compliance check at any time before 1 December 2026.
- 11.2. The information in this appendix is presented in Table 7.
- 11.3. The second column refers to the relevant Great British Insulation Scheme requirement, the third column refers to the documents (if any) that a supplier will need to make available to demonstrate compliance with that requirement, and the fourth column refers to the data (if any) that a supplier will need to make available to demonstrate compliance with that requirement.
- 11.4. We are looking to reduce the amount of evidence we require suppliers to hold and instead intend to rely on data TrustMark holds where applicable. This should reduce the amount of documentation suppliers might need to retain. Suppliers may want to ensure they do still have access to such evidence in case they need to support the eligibility or compliance of a measure at a later date.

Table 7: Documents and data to be made available on request

	Great British Insulation Scheme requirement	Document to be available on request	Data to be made available on request
1	Promotion of measure	<p>Documentation sufficient to establish 'promotion'.</p> <p>For example, in the case where a supplier contracts a person to install a measure at premises, a supplier should produce:</p> <ul style="list-style-type: none"> the contract(s) or other document(s) which establish the relationship between the supplier and the installer, under which the installation was performed (this includes documents which demonstrate that the installation was completed under an oral contract), AND where appropriate, evidence of the supplier's payment of, or contribution towards, the fees and other costs of the installation. For example, an invoice and a payment slip. 	
2	Specification of measure	<p>Documentation which can be used to verify the exact details of the measure.</p> <p>For Innovation Measures only – evidence that the product installed is</p>	<p>To include:</p> <ul style="list-style-type: none"> measure type manufacturer name product name

	Great British Insulation Scheme requirement	Document to be available on request	Data to be made available on request
		one of the 'products meeting description' listed on the ECO4 approved Innovation Measures document.	<ul style="list-style-type: none"> product serial number (where available) Details of Trustmark lodgement
3	Installation in accordance with certification schemes governed through Trustmark	<p>All scheme measures are required to be installed in accordance with PAS 2035.</p> <p>Suppliers must provide the details required to verify the measure has been successfully lodged with Trustmark and met any standards they require installed.</p>	Details of Trustmark lodgement
4	Address where the measure is installed	Documentation which can be used to verify the address – for example, a completed Great British Insulation Scheme Post-installation Declaration.	House / flat number Street Town / city Country Postcode Unique property reference number

	Great British Insulation Scheme requirement	Document to be available on request	Data to be made available on request
5	Date of completion	<p>Either:</p> <ol style="list-style-type: none"> 1. A copy of the declaration of conformity described at Chapter 9 of PAS 2030:2023, where such declaration has been produced and signed by the installer, OR 2. A completed Great British Insulation Scheme Post-Installation Declaration, OR 3. A declaration including the details listed below. <p>Either declaration must be signed by the occupant, or if unoccupied, the landlord, to confirm the date on which the installer finished work on the installation of the measure as well as the date the measure was handed over. This can be in an electronic form (we understand that some suppliers will capture this information electronically).</p> <p>We recommend the following wording is included in the declaration for the purpose of obtaining confirmation from the occupant or landlord, as applicable: For completion by the</p>	Date of completion

	Great British Insulation Scheme requirement	Document to be available on request	Data to be made available on request
		<p>occupant, or if unoccupied, the landlord:</p> <ul style="list-style-type: none"> • Confirmation that information provided by the installer is accurate • Date the installer finished work on the measure • Date of handover of all information relating to the measure • Occupant / landlord (print) • Occupant / landlord signature • Date <p>The declaration can be signed by someone acting on behalf of the occupant or landlord as long as they are not the installer, supplier or any other party in the supply chain.</p>	

12. Appendix 2 – Table of changes between the Great British Insulation Scheme and ECO4

Table 8 provides guidance on the changes to administration and policy between the Great British Insulation Scheme and ECO4 referenced within this document. The information provided in the summary column is a simplified description of these changes, please refer to the relevant chapters within this guidance document for more detail.

Table 8: Changes between the Great British Insulation Scheme and ECO4

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
About This Guidance	Yes	<p>The Great British Insulation Scheme will run alongside ECO4 from the date of commencement of the ECO4A Order (<i>Parts 1 to 9 of the ECO4A order relating to the Great British Insulation scheme commence on 25 July 2024 and the ECO4 scheme amendments in that Order take effect on 14 August 2023</i>) until 31 March 2026.</p> <p>ECO4 commenced on 27 July 2022 and will run until 31 March 2026 focusing on whole-house retrofits.</p> <p>The Great British Insulation Scheme is a separate obligation to the current ECO4 Scheme and aims to deliver rapid installation of energy efficiency measures to a wider pool of households in the least efficient homes, including those on the lowest incomes and those in lower Council Tax band homes.</p>

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Introduction	Yes	<p>The Great British Insulation Scheme broadens the eligibility pool from ECO4 and includes two eligibility groups. The first group is the low-income group which retains most of the eligibility criteria as ECO4, focusing on SAP rated properties D, E, F and G with low-income and vulnerable households.</p> <p>The second group is the general eligibility group that will expand eligibility to all homes within Council Tax bands A-D in England, A-E in Scotland and Wales.</p> <p>All low-income and general group homes must have a SAP rating of D, E, F or G. ECO4 is comprised entirely of a single obligation, the Home Heating Cost Reduction Obligation (HHCRO): the installation of insulation and heating qualifying actions, to reduce home heating costs for low income and vulnerable people. It also includes a solid wall minimum requirement, the EFG minimum requirement, and a minimum requirement for the improvement of a domestic premises' Standard Assessment Procedure (SAP) rating within a project.</p>
The Great British Insulation Scheme guidance	Yes	The guidance sets out our administrative processes and requirements for suppliers in accordance with the ECO4A Order, whereas ECO4 sets out administrative process in line with the ECO4 Order
Information gathering powers	No	
Queries and further guidance	No	The queries email address for the Department of Energy Security and Net Zero for both the ECO4A Order and ECO4 Order is ECOTeam@energysecurity.gov.uk
Who is Obligated under the Great British Insulation Scheme	No	If a supplier is obligated under ECO4, they will also be obligated under the Great British Insulation Scheme.

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Obligation Period	Yes	<p>The commencement date for the Great British Insulation Scheme is 25 July 2023 where the date for ECO4 was 27 July 2022.</p> <p>There will be three phases within the Great British Insulation Scheme: Phase A, Phase B and Phase C. These will mirror the following ECO4 phases: Phase 2, Phase 3 and Phase 4 (with the exception that Phase A started on 25 July 2023). Phase C and the corresponding ECO4 Phase 4 will both end on 31 March 2026.</p>
Group of Companies	No	
Supplier allowance mechanism	No	
Notifying customer numbers and supply	No	
What suppliers must notify	No	The dates in which suppliers must notify us of their customer numbers and supply do not differ between schemes, suppliers must notify us of this information for ECO4 and this will also be used for the Great British Insulation Scheme. See Table 4 for more information.
Calculating customer numbers and supply	No	
Calculating domestic customer numbers	No	
Calculating electricity supply	No	
Calculating gas supply	No	

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Calculating gas supply for Supplier of Last Resort (SoLR)	No	
Calculating gas and electricity supply when there is a supplier merger or licence acquisition	No	
Setting supplier obligations	No	
Obligations for each phase	Yes	<p>While the same suppliers are obligated for both schemes, the obligations for each scheme differ.</p> <p>For The Great British Insulation Scheme, the overall obligation is £55,998,000 in notional annual bill savings, which must be achieved by 31 March 2026.</p> <p>This is divided between the three years of the Scheme as follows:</p> <ul style="list-style-type: none"> • 25 July 2023– March 2024: £7,280,000 • April 2024 – March 2025: £24,359,000 • April 2025 – March 2026: £24,359,000. <p>The start/end dates of the GBIS phases align with ECO4 phases 2 to 4 with the exception of the start date of Phase A.</p> <p>For The Great British Insulation Scheme, Ofgem will determine the supplier's annual target as well as the low-income minimum requirement for each phase. The obligations set for each phase of the Scheme have the same 90% minimum delivery target which apply to the low-income minimum obligation.</p>

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
		<p>Unlike for the ECO4 scheme, for the Great British Insulation Scheme suppliers must meet each annual phase target in addition to the overall scheme target.</p> <p>The overall Scheme target must be achieved by the end of the Scheme – this will be the total of each of the annual targets – at this point there will not be any carry over or carry under considerations to factor in. Please see paragraph 4.2 of the ECO4 Administration guidance for more information.</p> <p>The obligations set for each phase of ECO4 are cumulative and do not need to be met individually for each phase. This means, for example, that a supplier is not required to meet its Phase 1 HHCRO by the end of Phase 1. Instead, a supplier's Phase 1 HHCRO will be added to its Phase 2, Phase 3 and Phase 4 HHCRO, and its total HHCRO must be met by 31 March 2026.</p>
Determining supply	No	
Determining the HHCRO and low-income minimum requirement for a supplier that is not a group company	Yes	The calculation methodology will be the same as the HHCRO calculation within ECO4 however the values of the specific obligation periods differ. The values that will be used for the Great British Insulation Scheme can be found in paragraph 4.15. The alphabetical symbols and phrasing used within the calculation and explanation also differ between schemes.
Determining the HHCRO and the low-income minimum requirement for a supplier that is a group company	Yes	The calculation methodology for determining this will be the same as the HHCRO calculation within ECO4 however the values of the specific obligation periods differ. The values that will be used for the Great British Insulation Scheme can be found in paragraph 4.17. The alphabetical symbols and phrasing used within the calculation and explanation also differ between schemes.
Carry Over, Carry Under and Early Deliver	Yes	

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Carry Over	Yes	In the Great British Insulation Scheme, carry over refers to annual bill savings delivered by a given supplier beyond the minimum required of them for a specific annual target. Carry over therefore can only apply to annual bill savings delivered in Phase A or Phase B. Carry over is unlimited, allowing suppliers the option to overdeliver their entire obligations in Phase A and/or Phase B, provided Phase A minimum is met; excess annual bill savings would then contribute to Phase B and Phase C, as appropriate. Suppliers will not be able to carry over measures to any Great British Insulation Scheme annual phase delivered in excess of obligations from under ECO4 or its predecessor schemes.
Caps	Yes	There are two caps in the Great British Insulation Scheme: Local Authority (LA) and Supplier Flex cap and the Innovation Measure (IM) cap.
Carry Under	Yes	There is no carry under in ECO4. Carry under for the Great British Insulation Scheme refers to under-delivery against a phase target carried forward to the following period. A supplier is permitted to carry under up to 10% of the annual target in each of phases A and B. No carry under is permitted in Phase C as suppliers are expected to meet their full obligations by the end of this phase.
Early Delivery	Yes	Early delivery for the Great British Insulation Scheme will be between 30 March 2023 and 24 July 2023. ECO4 Early Delivery ran between 1 April 2022 and 27 July 2022.
Trading obligations	Yes	There are differences in trading application deadline between both schemes, see more detail below.
Requirements for trading obligations	No	
Submitting a trade application	Yes	<p>A supplier may apply to trade an obligation at any time from when the ECO4A order comes into force. For the Great British Insulation Scheme, trading applications have a deadline for each phase.</p> <p>Phase A – 31 December 2023</p>

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
		<p>Phase B – 31 December 2024</p> <p>Phase C – 31 December 2025</p> <p>There is no per-phase trade deadline in ECO4 however there is an overall deadline of 30 September 2025.</p>
Notification of completed measures	No	
When a supplier must notify us of completed measures	Yes	<p>Great British Insulation Scheme measures completed on or before 31 December 2023 must be notified on or before 31 January 2024. Measures completed after 31 December 2023 measures must be notified by the end of the month after the month the measure was completed.</p> <p>For ECO4, measures that were completed on or before 31 August 2022 had to be notified on or before 30 September 2022.</p>
When is the installation of a measure complete?	No	
Notifying measures	Yes	Change in notification template. The Great British Insulation Scheme measure notification template should be completed for this scheme.
Rejected measures and incomplete projects	No	
Information suppliers must include as part of notification	No	

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Errors in notifications	Yes	There is a changes to dates relating to errors in the notification template. For the Great British Insulation Scheme, changes can be freely corrected at any time before 1 August 2024. After this date, a change request may be needed. For ECO4, changes can be made up until 1 February 2024.
Notifying late measures	No	
Automatic extensions for 5% of measures	Yes	There is a change to the dates in which the 5% automatic extension is applied. For the Great British Insulation Scheme for measures completed after 31 December 2023, up to 5% of the number of measures installed in a particular calendar month, and notified on time, can be given an automatic extension of three months to the notification deadline.
Determining if measures fall within a supplier's 5% automatic extension quota	Yes	For the Great British Insulation Scheme, all delivery in 2023 falls under one quota for this calculation but is calculated per month from 2024 onwards
Applications for an extension to the notification deadline	No	
Monthly report to the Secretary of State	No	
Fair and transparent processing	No	
Transfers of measures and projects	No	
Applying for approval to transfer measures	No	

Section	Is there a difference between The Great British Insulation Scheme and ECO4?	Summary of differences
Intra-supplier transfers	No	
Inter-supplier transfers	No	
Submitting a transfer application	No	
Approving a transfer application	No	
Following a transfer	No	
End of the overall obligations period	No	
Achieving your obligation	Yes	For the Great British Insulation Scheme, we will notify all suppliers of our final determination before 1 December 2026. For ECO4 this date is 30 September 2026.
Ahead of our final determination	Yes	For final determination for the Great British Insulation Scheme, we will check supplier's performance towards the low-income minimum requirement and all annual targets. In ECO4, we look at the broader list of targets that apply within that scheme.
Final determination at the end of Phase C	Yes	This will mirror the process used for ECO4 Phase 4 however suppliers will be notified of our final determination before 1 December 2026. In Phase 4 of ECO4, suppliers will be notified of our final determination before 30 September 2026.
Our final report to the Secretary of State	Yes	<p>Our final report to the Secretary of State for the Great British Insulation Scheme will be submitted later than the ECO4 final report. The Great British Insulation Scheme final report will be sent before 1 December 2026.</p> <p>The final ECO4 report will be submitted by 30 September 2026.</p>

13. Appendix 3 – Acronyms

Acronym	Explanation
AQ	Annual Quantity
CWI	Cavity Wall Insulation
DUoS	Distribution Use of System Charges
ECO	Energy Company Obligation
GDPR	General Data Protection Regulation
HHCRO	Home Heating Cost Reduction
HTHG	Help to Heat Group
IM	Innovation Measure
ISLCT	Intra-Supplier Licence Consolidation Trading
LA	Local Authority
LDSO	Licensed Distribution System Operators
PAS	Publicly Available Specification
RdSAP	Reduced data Standard Assessment Procedure
SAP	Standard Assessment Procedure
SWI	Solid Wall Insulation

14. Appendix 4 – Glossary

A

Annual quantity (AQ) is the estimated annual gas consumption of a customer over a year under seasonal normal conditions. AQs are set annually by Xoserve in consultation with gas shippers.

C

Cost saving is the money saved annually by the measure in heating a domestic premises and where applicable, heating water or generating electricity at those premises.

D

The **date of handover** is, for measures installed in accordance with PAS 2035 (including measures listed within PAS 2030, as defined within PAS. Broadly it includes, where required, any explanation by the installer on the safe, efficient operation of the system, as well as any guidance on care and maintenance.

Deemed scores are a method of determining the contribution certain measures make towards a supplier's obligation. Deemed scores are fixed scores for each measure type that are determined using three or four variables.

Domestic customer means a person living in domestic premises in Great Britain who is supplied with electricity or gas at those premises wholly or mainly for domestic purposes.

Domestic premises means separate and self-contained premises used wholly or mainly for domestic purposes. A mobile home is considered domestic premises if it is a caravan and is used as a dwelling.

A **dual licence-holder** is a company that holds both an electricity supply licence and a gas supply licence.

E

Elexon administers the wholesale electricity balancing and settlement arrangements for Great Britain, as set out in the Electricity and Balancing Code. Further information can be found at www.elexon.co.uk.

G

The **General Group** is formed of homes which fall within Council Tax bands A-D in England and A-E in Scotland and Wales. all tenure type should have a SAP band rating of D-G in England and Wales or D-E in Scotland. The SAP band rating can be determined from an RdSAP assessment if a home does not already have a SAP rating eg possibly a listed building.

The **Great British Insulation Scheme In-fill** is a mechanism to ease delivery of SWI (Solid Wall Insulation) and CWI (Cavity Wall Insulation) measures. For every eligible flat, another can be treated as 'in-fill'; for every eligible house, three more houses can be treated as 'in-fill'. Measures installed to in-fill properties also count towards a supplier's obligation.

A **group company** is a licence-holder that is a member of a group of companies that includes at least one other licence-holder.

Group of companies means a holding company and the wholly-owned subsidiaries of that holding company. 'Holding company' and 'wholly-owned' subsidiary have the same meaning as in section 1159 of the Companies Act 2006.

H

The **Home Heating Cost Reduction Obligation (HHCRO)** is the installation of heating qualifying actions to people deemed to be in either low-income or general group households.

L

A **licence-holder** means an electricity licence-holder, a gas licence-holder or a dual licence-holder.

Lifetime is the estimated lifetime for measures. lifetimes will be set out in the delivery guidance is the installation of an eligible ECO4A measure.

Low-income group is made up of householders who receive one or more listed means tested benefits (as laid out in the Great British Insulation Scheme Guidance: Delivery), gain eligibility through Great British Insulation Scheme Flex or are living in social housing.

R

The **Reduced data Standard Assessment Procedure (RdSAP)** is a simplified version of SAP (Standard Assessment Procedure) that requires fewer data inputs. The version in use at the scheme start was RdSAP 2012. GBIS scores are based on the energy efficiency rating mechanism defined by RdSAP 2012. The current version of RdSAP at the time of this publication is RdSAP 10.

Relevant year, with respect to the qualification year, means 2023, 2024, or 2025.

S

Standard Assessment Procedure (SAP) for the energy rating of dwellings is the methodology currently used by the government to estimate the energy performance of homes. SAP was developed by the Building Research Establishment for the former Department of Environment based on the BRE Domestic Energy Model. For further details see [Standard Assessment Procedure - GOV.UK](#)

A **score** is the contribution that a measure makes towards a supplier's total HHCR0 in pounds sterling (£). The score is calculated using the cost saving and the relevant HHCR0 uplift, where applicable. Methodologies for determining the score to be notified will be set out in the delivery guidance

X

Xoserve is the gas transporters' agent and it delivers transportation transactional services on behalf of all the major gas network transportation companies. Further information can be found at www.xoserve.co.uk.