

Obligated ECO suppliers and  
other interested parties

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*Promoting choice and value for  
all gas and electricity customers*

Email: [eco@ofgem.gov.uk](mailto:eco@ofgem.gov.uk)

Date: 30 September 2013

Dear stakeholder

**Energy Companies Obligation (ECO): Update to the consultation on requirements for demonstrating characteristics of hard-to-treat cavities**

On 27 August 2013 we published a consultation document seeking views on our proposed requirements under the Energy Companies Obligation (ECO) for demonstrating the characteristics of a hard-to-treat cavity wall (HTTC) to which insulation has been installed.

The consultation put forward proposals to address concerns that a significant number of HTTC measures installed under ECO may have been installed to cavity walls that do not meet the statutory definition of 'hard to treat cavity'. The consultation closed at 1pm on 24 September 2013.

We received a high number of responses to the consultation, many of which suggest changes to the proposals. In order to properly review all of the responses and consider modifications to our consulted position, we no longer intend to publish the outcome of the consultation by 1 October 2013 or to implement any new requirements relating to HTTCs from 1 October 2013.

We will confirm the 'date of effect' for any new requirements relating to HTTCs in our response to the consultation and additional guidance on HTTCs. These documents will be published at least one month before the new requirements come into effect. The date of effect for any new requirements will be no earlier than 1 December 2013.

Suppliers who have implemented (or wish to implement) the practices outlined in the consultation may continue to do so and should contact us. Suppliers who do not adopt the practices outlined in the consultation should notify HTTC measures in line with standard processes until any new requirements come into effect.

Measures notified in line with standard processes will be subject to additional checks to ensure they meet the statutory definition of 'hard to treat'. We are currently developing policies to process those HTTC measures subject to additional checks and will publish further information as soon as possible.

For clarity, we note that the proposals contained in the consultation relate to certain categories of HTTC only. These categories are:

- a **narrow cavity** (a cavity less than 50 millimetres wide)<sup>1</sup>;
- a cavity wall which is not suitable to insulate with **standard insulation materials or techniques** (for example properties with severe or very severe exposure to wind driven rain, or cavities which are already partially filled)<sup>2</sup>;
- a cavity wall which is not suitable to insulate without **substantial remedial works** to the building (for example weather proofing of the building to prevent water penetration)<sup>3</sup>; and
- **uneven cavity in natural stone walls**, or from natural stone outer leaf and block or brick inner leaf<sup>4</sup>.

The remaining categories of HTTC are not affected by these proposals and existing processes are satisfactory. These categories are:

- a cavity wall in a building with **three or more storeys**, and where at least three storeys have cavity walls<sup>5</sup>; and
- a cavity found in homes of **prefabricated concrete construction or with metal frame** cavity walls<sup>6</sup>.

Any questions regarding the consultation can be emailed to [eco@ofgem.gov.uk](mailto:eco@ofgem.gov.uk).

Yours sincerely

Will Broad  
Head of ECO

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<sup>1</sup> See paragraph 5.14(4) of the Energy Companies Obligation (ECO): Guidance for Suppliers (version 1.2) (Guidance).

<sup>2</sup> See paragraph 5.14(2) of the Guidance.

<sup>3</sup> See paragraph 5.14(3) of the Guidance.

<sup>4</sup> See paragraph 5.14(6) of the Guidance.

<sup>5</sup> See paragraph 5.14(1) of the Guidance.

<sup>6</sup> See paragraph 5.14(5) of the Guidance.