

Dear Mr Broad

Please find below my officer opinion on the above mentioned consultation. I work to support the Housing Authorities of Christchurch Borough Council, East Dorset District Council, North Dorset District Council, Purbeck District Council, West Dorset District Council, and Weymouth and Portland Borough Councils develop and deliver their policy on energy efficiency, fuel poverty, affordable warmth, and healthy homes. This response is not submitted on behalf of them or in their names since I have not had time to consult with them.

In general, robust verification is welcomed. Delivering the Energy Company Obligation (ECO) is a multi-billion pound programme and a proportional and credible response to audit and administration is clearly desirable. The audit and verification process applied to CERT (the predecessor to ECO) that led to Ofgem accepting that nine million tap and shower flow restrictors have been fitted is not the sort of process that should be used for ECO.

However, the proposed requirements for demonstrating characteristics of hard to treat cavities appear to add yet more cost and administrative burden to a scheme that is already widely regarded as overly complex: A scheme that undoubtedly will provide more accurate data than its predecessor but at increased and difficult to justify cost.

While potential abuses of CERT led to UK energy bill payers subsidising unused equipment, exported light bulbs, and energy efficient televisions that did not always replace their predecessors, the worst-case scenario of an ECO-obligated installer insulating a "non-compliant" cavity is that CO2 targets are met at lower cost, householders energy bills are reduced, and the energy grid is put under less stress. The consultation itself notes that part of the purpose is to "deter the installation of measures..". While deterring the installation of measures may fit with the letter of the law, it runs counter to the general direction of energy efficiency policy of all UK governments over recent decades.

I commend Ofgem to listen to ECO obligated suppliers and the delivery agents "on the ground" and make ECO as simple and practical to deliver as possible, in the interest of the millions of bill payers who ultimately pay for and stand to benefit from it.

Kind regards

Jon Bird
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Dorset County Council