

# ECO2t consultation Part 1: consultation questions

## Background

The questions below relate to the ECO2 consultation on the transition period which can be found on our website:

<https://www.ofgem.gov.uk/environmental-programmes/eco/contacts-guidance-and-resources/consultations-and-feedback>

## Notes For Completion

The consultation is open from 12 October 2016 to 23 November 2016. We have provided a template for responses to help us collate and analyse the feedback we receive. Please complete all relevant sections of the document by selecting an answer for the question and then providing reasons/evidence for your response in the box provided. **Please do not amend the format of the template.**

Where use of the template is not possible, other formats will still be accepted. Please send your responses to [eco.consultation@ofgem.gov.uk](mailto:eco.consultation@ofgem.gov.uk) by **close of business on 23 November 2016**.

## Respondent details

|                    |   |
|--------------------|---|
| Organization Name: | BEAMA Limited   |
| Completed By:      | Les Woolner, Business Development Director  |
| Contact Details:   | e-mial: les.woolner@beama.org.uk<br>Tel: +44(0)7885 164303<br>BEAMA, Westminster Tower, 3 Albert Embankment, London SE1 7SL |

## Scheme extension

**Q1.** Do you agree with our proposed administrative approach and guidance relating to our final determination of CSCO?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please provide reasons and any alternative suggestions.

BEAMA has no strong view

## Help to heat group

**Q2.** Do you agree with our proposed approach to evidencing help to heat eligibility?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please provide reasons and any alternative suggestions.

Whilst BEAMA has no strong view, we welcome changes which simplify the process of evidencing that a customer is a help to heat group member.

### Social housing with an EPC energy efficiency rating of E, F or G

**Q3.** Do you agree with our proposal to use a declaration signed by a social landlord to evidence that the EPC energy efficiency rating reflects the current characteristics of the property?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

**Q4.** Do you agree with our proposal to evidence that premises are being let below market rate using a declaration signed by a social landlord?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

**Q5.** Do you agree that where multiple measures are installed in a single property, a further declaration should be signed by the social landlord after each installation to confirm the energy efficiency rating remains below Band D?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

## First time central heating

**Q6.** Do you agree with our interpretation of “at no point prior”?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☒ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

We do not agree that 'an electric storage heater' can be classified the same way as a 'central heating system'. One electric storage heater is not a central heating system (as per the description in 2.30). We strongly suggest that 'an electric storage heater' be removed completely. ECO measures should be made available to a property that has previously had an electric storage heater installed. There are significant benefits to be had in moving from basic / traditional electric storage heaters to a smart electric thermal storage system (SETS) e.g. a heat retention storage heater (see responses to Q8 and Q9) or other eligible measures.

Following on from the logic above, we believe that 'an electric storage heater' should be included in the list in 2.41.

**Q7.** Do you agree with our proposal to evidence that a central heating system or an electric storage heater was not present prior to installation of a central heating system or DHS using a declaration signed by a social landlord?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

See responses to questions 6,8 and 9 in terms of electric storage heating.

**Q8.** Do you agree with the primary heating sources we have listed as eligible for first time central heating measures?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☒ Strongly Disagree
- ☐ Don't Know

If not, please identify which primary heating sources you think should be included/excluded.

Based on our response to Q6, we believe that 'an electric storage heater' should be included in this list.

**Q9.** Do you agree with the heating measure types we have listed as eligible for evidencing first time central heating measures?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☒ Strongly Disagree
- ☐ Don't Know

If not, please identify which heating measure types you think should be included/excluded.

We disagree with the primary heating sources listed as they omit a measure widely recognised as offering significant improvements. We recommend the addition of smart electric thermal storage

systems (SETS) to the list in 2.44 as an eligible measure. SETS e.g. High Heat Retention Storage Heaters have been recognised under SAP (SAP2012 version 9.92, may 2013 - BS EN 60531) as providing a step change in energy efficiency and running costs for electrically heated homes, and will offer significant, recognised improvements to the amount of energy used in a property. Furthermore, SETS also offer the potential for controllable demand side management which will become increasingly necessary as our electricity generation moves to renewable sources. Home owners / tenants with SETS installed will be able to benefit from new revenue streams from demand side management which will lower electricity bills.



## Flexible eligibility

**Q10.** Do you agree with the proposed approach for administering local authority declarations for HHCRO eligibility?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view. However, some further clarity may be needed in the proposed guidance document(s) as to the measures that can be delivered to households listed in a declaration from a Local Authority (LA). The criteria for an LA declaration is that households can only be listed if they are either in or at risk of fuel poverty, or on a low income and vulnerable to the effects of living in a cold home. Presumably the measure exceptions (e.g. first time central heating), referred to in the Social Housing category, do not apply to any form of LA declaration

## Regular score minimum requirement

**Q11.** Do you agree with the list of measures in Table 4 that we propose should not count towards the RSMR?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☒ Strongly Disagree
- ☐ Don't Know

If not, please identify which measure you think should be included/excluded.

There is still a huge number of inefficient boilers in service, the industry estimates that around 2 million boilers would be classed as extremely inefficient and in total around 9 million as simply inefficient.

Boilers not only provide space heating but also domestic hot water. The impact of cold weather on health is estimated to cost the NHS £1.5bn a year, with over 18,000 premature deaths last winter. Cold exacerbates a huge range of health issues, including asthma, bronchitis, heart and lung disease, kidney disease and mental health problems. These widely recognised issues prompted the 'boilers on prescription' concept introduced by the last government.

We would propose that the limits (via RSMR) on qualifying gas boilers be scrapped, encouraging plans for integrated packages of measures including gas boilers and controls, allowing flexibility to address the needs of those most in need.

## Party cavity wall insulation

**Q12.** Do you agree with our proposal to distinguish between the different in-use factors for PCWI based on the date of installation?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

## Evidencing pre-existing loft insulation

**Q13.** Do you agree that a PAS pre-installation survey can be used to record the depth of any pre-existing loft insulation?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

**Q14.** Do you agree that 3% of technical monitoring for loft insulation measures should take place pre-installation?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

**Q15.** Do you agree that the depth of any pre-existing loft insulation can be checked post-installation during a technical monitoring inspection?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

## Evidencing non-gas fuelled premises

**Q16.** Do you agree that the PAS pre-installation survey can be used to evidence the main heating system fuel type for the premises?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

## New build definition

**Q17.** Do you agree with our proposal to evidence occupancy for all ECO measures as an alternative to demonstrating that premises receiving ECO measures are not new build?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q18.** Where premises are unoccupied, do you agree with our proposal to evidence previous occupancy?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q19.** Where a measure is delivered exclusively to a new build extension, do you agree with our proposal to evidence that the extension was completed before installation using building control sign off?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q20.** Where there is no evidence of occupancy prior to installation, do you agree with our proposals for evidencing that premises were erected before 1 April 2017?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view



## Automatic extensions for 5% of measures

**Q21.** Do you agree that the first 5% of late measures notified to us for a particular calendar month, without an extension request, should be processed automatically?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q22.** Where the automatic 5% allowance is exceeded within a single month's notifications, do you agree that a supplier should be given an opportunity to determine which measures it wants to include in the automatic 5% and which it will submit an extension request for?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q23.** Where a supplier does not indicate to us which measures it wants to include in the automatic 5% within 10 days, do you agree that we should select which measures will be automatically processed?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

## Trading obligations

**Q24.** Do you agree with our proposal that where a supplier trades between its own licences, it must trade to the licence with the biggest original obligation?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q25.** Do you agree with our proposals for trading between different suppliers, that:

- trades must be to the receiving supplier's licence with the biggest original obligation
- an application must include the annual turnover of the licence that would be taking on additional obligations, and
- where a supplier is taking on an amount greater than its original phase 3 ECO2 obligation, do you agree with our proposed evidence requirements to demonstrate that the supplier can deliver the additional obligation?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

**Q26.** Do you agree with our proposed timescales for processing trading applications?

- ☐ Strongly Agree
- ☐ Agree
- ☒ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.

BEAMA has no strong view

## PAS

**Q27.** Do you agree with us collecting an installer's PAS certification number as part of notification?

- ☒ Strongly Agree
- ☐ Agree
- ☐ Neither Agree Nor Disagree
- ☐ Disagree
- ☐ Strongly Disagree
- ☐ Don't Know

If not, please state your reasons and any alternative proposals.