



Response to OFGEM Response ECO2t consultation part 2;

Help to Heat Flexible Eligibility Local Authority Declarations

16 February 2017

ALEO NW feedback

Introduction

The Association of Local Energy Officers North West (ALEO NW) is the membership organisation for regional public sector bodies (mainly local authorities, housing associations, primary care trusts and energy advice providers) involved in promoting, sponsoring and delivering low carbon actions in the domestic sector. We have an active membership of approximately 50 individuals representing all NW Local Authorities and advice centres. We meet quarterly to exchange information and network. We have been unable to canvass our members' opinion on this and this response therefore forms the considered response of the Chair only (with some selective discussions with members) and represents no individual organisation.

Consultation response questions

1.	<i>Do you agree that an LA declaration should be dated prior to the date of installation of the measure?</i>
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We see no requirement for declarations to be dated prior to installation, in fact we see the pressure required by installers to secure a declaration will outweigh any concerns highlighted (as it is installer who will be penalised if the install is non-compliant).

We have significant concerns about how declarations will operate on day to day basis. There are several options but it is not clear on the delivery pathway. We can foresee a scenario where an LA issues a declaration for resident (as it's the resident that is being assessed not the address). The declaration is only for an address so if there is a change of tenant or circumstances the address is still a valid recipient.

Also how will declarations be circulated? Will they be passed to energy companies before the address is inspected for install? How many contractors / energy companies will get the declarations for the same address? Will the occupant be harassed by many companies trying to install, or none because there are no schemes? Will lead generators trawl likely neighbourhoods getting households to apply for declarations? Given that declarations are essential to OFGEM these could easily be circulated and given that they contain potentially very confidential information we have significant concerns about their distribution.

We are therefore recommending 2 key elements to be added to the declaration. 1. That the declaration is linked to an installer/ managing agent / utility and only valid to that one organisation. 2. That the declaration is time limited so that no one company holds on to a declaration to prevent another installing in that property. We would like to see these two elements added to the declaration and both be incorporated in the URN so that OFGEM can check validity with LA published lists.

This allows LAs, ECO providers and OFGEM to ensure that data protection and privacy are controlled much better.

We would question OFGEM's approach to monitoring in only contacting ECO obligated parties. It would be prudent where concerns exist about the validity of declarations to go direct to the LA and ask them to authenticate.

2.	<i>Do you agree with our proposed administration of SWI in-fill?</i>
	Yes. We would see no problem in requiring that declarations are dated prior to install here as the quantity is limited and timescale involved should not be a barrier to implementation.
3.	<i>Do you agree with our proposed administration of evidencing that the Local Authority has published a statement of intent and that it includes the minimum required information?</i>
	<p>The onus is on ECO obligated parties to show the Statement of Intent exists was dated accordingly.</p> <p>We also see that Statements of Intent could be reviewed at any time so we think Declarations need to be clear which version they relate to.</p> <p>We would also suggest that OFGEM contact some LA to cross check that the evidence supplied is same as the records held by the LA.</p>
4.	<i>General comments</i>
	We believe that unless OFGEM work with LA directly, there more scope for fraud and maladministration. We would like to see an exchange of information between parties. It would be both useful and prudent for OFGEM to confirm directly with a sample of LA what has been claimed for. Also LA would want details of what has been installed anyway and this would assist with annual reporting.