

Dear Ofgem,

Please find below the Bristol City Council and Core Cities response to the Ofgem Help to Heat consultation Part 2.

1. Do you agree that an LA declaration should be dated prior to the date of installation of the measure?

Disagree. Local authorities are required to report on the numbers of measures installed under flexible ECO. If declarations are given to companies before installation and there is no requirement to confirm a measure or measures have been installed this information may not be available to local authorities. Additionally in the BEIS Guidance it states that the customer journey for vulnerable residents should be the priority. It is recognised that it is in the interest of installers to check that people will be covered by a declaration and that this has been assessed before work is carried out, but when in the customer journey a declaration is made and dated should be part of the individual negotiations between suppliers / contractors and local authorities to determine when it is most appropriate.

2. Do you agree with our proposed administration of SWI in-fill?

1.10 In-fill households must be listed in an LA declaration for SWI projects, alongside the FP or LIVC households that meet the relevant criteria. The LA must ensure that for each project the minimum percentages are met for FP or LIVC households against the relevant property types. The relevant percentages are outlined in our draft guidance.

1.11 Where a supplier delivers measures to in-fill households it must be satisfied that the relevant percentage of FP and LIVC households, are met for each project in the declaration.

Disagree that the LA should be listing the in-fill properties on the declaration. The LA is confirming the eligibility of the households that can receive measures under ECO flex. The LA should not be required to provide assurances above and beyond this. The scheme should work in a similar way to the EST data match. It would then be left with the supplier/installer to ensure that their scheme meets the in-fill percentage requirements. This would also allow schemes to manage the inevitable changes in which eligible and in-fill properties decide to go ahead to install, as this will affect the percentages and it is unreasonable and unnecessary for the LA to be involved in projects to this level.

In addition the proposed administration of SWI in fill does not state when the measurements of FP and LIVC households needs to take place. People move in and out of FP particularly in areas with a high proportion of dwellings for private rent. There may be a gap between a project being assessed as satisfying the minimum percentage and measures actually being delivered. It would be an undue administrative burden if local authorities were required to redo the assessments and calculations. For clarity it should be specified that any assessments and calculations which take place between now and the end of the transition period would be acceptable for making a declaration, and if this provision carries on into ECO3 a specified time where assessments remain valid should be consulted on.

3. 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?

Yes

Should you wish to discuss any of these points, please do not hesitate to contact either myself or Sarah Sawyer (cc'd).

Internal Only

Kind regards,
Sarah

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