

Dear OfGEM,

Please find below the response from Durham County Council to your consultation.

Question 1

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

Disagree. Local Authorities will no doubt be required to provide information to support these declarations when requested to do so by OfGEM. Therefore it is essential that Local Authorities are provided with this information from the companies installing the SWI measures when work has been carried out to confirm these works have taken place as per the declaration thus acting as an audit trail for these measures installed. However if a LA provides the approval/declaration prior to a measure being installed it may become difficult/impossible to obtain this information on the numbers of properties that have received the SWI measures from the company who has carried out the work. The LA declaration could have two stages, a pre install declaration indicating the numbers of properties to be assisted, then on completion and before the funding is accessed a second stage declaration providing the address specific information from the company to the LA before the flexible ECO funding is paid. The households should also be provided with a pack of information on the SWI package prior to any works to ensure they fully understand the process.

Question 2

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

As the assessment of FP and LVC will be a significant stage in the process for household eligibility, it is important that this assessment takes place at the beginning of the application process. However clarity on when the assessment is required need to be quantified within the proposals for administering the SWI in-fill projects. This is an important stage especially when dealing with sectors that may have a high turnover of occupation such as maybe in the private rented sector and could adversely affect projects if, due to the administration process a scheme takes time to commence allowing the occupational demographics to change. This requires clarification in the guidance and could be assisted by an assessment being valid for a period of time i.e. 12 months even if the occupancy changes during that period

Question 3

Do you agree with our proposed administration of evidence that the local authority has published a statement of intent and that it includes the minimum required information

Agree on the proviso that BEIS consult with LA's to ensure their guidance provides full clarity for LA's. Suggest that template Sol's are available to ensure they are fit for purpose, including the requirement for an audit trail of the publication date along with the requirement to publish before and measures are installed.

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