

# Consultation – BillSaveUK Response

Energy Company Obligation (ECO3)



<b>Publication date:</b>	23 July 2018	<b>Contact:</b>	Mark Antcliff & Richard Thompson
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No.	Page	Question	Relates to	Response
1	17	Do you agree with our administration of carry-over? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Carry-over and early delivery	Yes.
2	19	Do you agree with our administration of early delivery? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Carry-over and early delivery	Yes.
3	27	Do you agree with our proposal that child benefit should only be used as evidence of eligibility where it is the only available route to eligibility? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Obligation targeting and household eligibility	No. We believe that utilising the Child Benefit criteria can be an easier, more cost effective and less stressful route for qualification.  On the general point of self-declaration, we agree that it can improve take up and reduce administration costs, however it can be abused. As such we suggest that a 5% dip test is administered centrally.
4	27	Do you have any suggestions for verifiable means of evidencing household income & Child Benefit, or other means of evidencing the new Ministry of Defence benefits? If you have a suggestion, please provide evidence to support your response.	Obligation targeting and household eligibility	Could evidence via bank statements be allowed?  Could an automated verification tool be created (to be determined), which links to one or more of the credit reference agencies i.e. EQUIFAX.
5	30	Do you agree with our administration of the new PRS rules? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Obligation targeting and household eligibility	Yes

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6	32	Do you agree with our proposal that where measures that provide equivalent savings to solid wall insulation are installed, all relevant measures would need to be installed within a six-month period to count towards the SWMR? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Solid wall insulation and the in-fill mechanism	Yes
7	33	Do you agree with the other elements of our administration of SWMR? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Solid wall insulation and the in-fill mechanism	Yes
8	35	Do you agree with our proposal that transferring in-fill measures would not be possible until all connected measures are approved? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Solid wall insulation and the in-fill mechanism	Yes
9	35	Do you agree with the other elements of our administration of in-fill for SWI and DHS? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Solid wall insulation and the in-fill mechanism	Yes.
10	40	Do you agree that we should continue to use the same criteria for determining if a heating system is broken as we currently use (as detailed in paragraph 6.15)? If you	Changes to heating measures	No. A more robust method of proving that the boiler is broken needs to be put in place. Need to allow for an assessment of the whole system not just the boiler.

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		disagree, please provide alternative suggestions, including any evidence, to support your response.		<p>Increased and additional independent site audit regime should be adopted for the whole process from survey to install to verify suitability of:</p> <ul style="list-style-type: none"><li>• Boiler to be supplied</li><li>• That the whole heating system is adequate and in working order.</li></ul> <p>There needs to be a post installation assessment check to confirm boiler and system now working within allowed parameters.</p> <p>Believe that a minimum warranty period should be offered of 7 years for all new boilers.</p>
11	41	Do you agree with our proposal to continue to use the definitions and tables in the boiler assessment checklist and electric storage heater checklist to determine if broken heating systems can be economically repaired? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Changes to heating measures	Yes. Refer to response q10.
12	44	Do you know of any heating systems (other than boilers or electric storage heaters) for which we would need to develop a definition for inefficient? If you do, please provide evidence to support your response.	Changes to heating measures	Heat Pumps.

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13	46	Do you agree with our proposal to use a declaration to evidence first time central heating? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Changes to heating measures  Innovation, in-situ performance monitoring and scoring	No. Though we agree with the principal of the first-time declaration. Additional evidence via previous EPC data should be provided to evidence that properties have never had a heating system.  FTCH should require insulation to be installed alongside it.
14	51	Do you have any suggestions for our administration of demonstration actions? If you do, please provide further information, including any evidence, to support your response.	Innovation, in-situ performance monitoring and scoring	Each proposed measure should be evaluated on its own merits.
15	51	Do you have any suggestions for our administration of innovation measures? If you do, please provide further information, including any evidence, to support your response.	Innovation, in-situ performance monitoring and scoring	Each proposed measure should be evaluated on its own merits.
16	52	Do you have any suggestions for our administration of in-situ monitoring? If you do, please provide further information, including any evidence, to support your response.	Innovation, in-situ performance monitoring and scoring	Each proposed measure should be evaluated on its own merits.
17	53	Do you agree with our administration of the uplift? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Innovation, in-situ performance monitoring and scoring	Yes.

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18	56	Do you agree with our proposal that measures installed in accordance with PAS 2030: 2017 Edition 1 must be notified to an organisation (such as a certification body) accredited to EN 45011 or EN ISO/IEC 17065:2012? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Consumer protection	Yes
19	57	Do you agree with our proposal that, where a supplier does not wish to register a DHS project with Heat Trust, they must arrange an audit by a third party and the result of the audit must confirm that the arrangements are equivalent to the requirements under Heat Trust? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	Consumer protection	Yes.
20	61	Do you agree with our administration of the new definition of 'cost saving'? Please provide further information, including any evidence, to support your response.	Definition changes and our administration	Yes.
21	64	Do you agree with our revised interpretation of 'domestic premises'? If you disagree, please provide evidence that the premises outlined in paragraph 9.18 should be treated as domestic premises.	Definition changes and our administration	Yes.
22	66	Are there any areas where you think further guidance would be useful?	Definition changes and our administration	Validation of broken boilers.

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23	66	Do you have any further comments on our proposed administration for ECO3?	Definition changes and our administration	No
24	66	Did you use our online response tool? If you used our online response tool, do you have any feedback?	Definition changes and our administration	Yes

Mark G Antcliff  
Head of Trading  
BillSaveUK Limited 20 August 2018