

Energy Company Obligation 2017-2018 (ECO2t):ECO2t consultation Part 2

Draft Guidance

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Overview:

This draft guidance document is supplementary to our ECO2t Part 2 consultation document. It outlines our proposed administration for some aspects of the extension to the ECO2 obligation period from 1 April 2017 to 30 September 2018.

This draft guidance relates to the second of two consultations we have published to seek views on our approach to administer the confirmed changes to the ECO2 scheme as per the government response to the ECO: Help to heat consultation.

This consultation is open for two weeks from 2 February 2017 to 16 February 2017. We are running a shorter consultation as the changes to the scheme have only recently been confirmed. We are aware of the need to provide final guidance as close to the scheme start as possible so that stakeholders can begin planning ECO2t delivery.

We welcome your views on our proposals. Please respond to eco.consultation@ofgem.gov.uk by 16 February 2017.

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About this draft guidance

Background

The ECO2 Order 2014 sets out the requirements for the ECO2 obligation period, which is due to end on 31 March 2017. BEIS has confirmed an extension to the ECO2 scheme of 18 months from 1 April to 30 September 2018. Details of the changes to the scheme can be found in the government response to the ECO: Help to heat consultation.¹

This draft guidance presents our proposed administration of changes to the ECO2 scheme that were confirmed in the government response to the ECO: Help to heat consultation.

In developing our guidance for the extension to ECO2 (ECO2t) we have run two separate consultations: ECO2t Part 1 and ECO2t Part 2. The first consultation, ECO2t Part 1, focused on changes detailed in the draft amendments to the ECO2 Order.² We have now published our response to this consultation, confirming our final policy on these changes to the scheme.

Our second consultation, ECO2t Part 2, addresses changes that BEIS confirmed in the government response to their ECO: Help to heat consultation. This draft guidance covers the introduction of a rural minimum requirement and proposals to administer aspects of flexible eligibility under HHCRO.

Table 1 summarises the dates for the ECO2t consultation process.

	ECO2t Part 1	ECO2t Part 2
Consultation launch	12 October 2016	2 February 2017
Consultation close	23 November 2016	16 February 2017
Publications following our assessment of responses	Consultation response (ECO2t Part 1) Once the amended Order is laid before Parliament we will publish updated draft guidance, including changes from ECO2t Part 1 consultation and deemed scores	Consultation response (ECO2t Part 2) Final guidance (Administration and Delivery)
Publication date	30 January 2017	April 2017

Table 1 ECO2t consultation process

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536679/Illustrative_draft_of_the_Electricity_and_Gas_Energy_Company_Obligation....pdf

¹ https://www.gov.uk/government/consultations/energy-company-obligation-eco-help-to-heat

Format of the consultation

This consultation seeks views on our proposed administration of the policies which have been confirmed since the government published its response to the ECO: Help to heat consultation.

These proposals have been formed on the basis of the information available to us at this time and may change once the amended regulations are finalised.

Each section of draft guidance is marked to show whether it will be included in the Administration or Delivery guidance.

We outline in each chapter whether the changes are updates to existing sections of guidance or entirely new sections. All changes to existing sections of the ECO2 guidance are shown in red, including additional changes made as a result of the Part 1 consultation.

The draft guidance contains paragraph numbers for the purpose of cross referencing in consultation responses. However, please note the guidance is not a complete draft and so the paragraph numbers will change in the final version.

ECO2t guidance

We are proposing to publish new versions of both the Administration and Delivery guidance documents for ECO2t. These documents will contain all relevant information for measures installed from 1 April 2017.

The ECO2 guidance documents will remain live until we make our final determination for ECO2 by March 2019. However, the information and requirements within them will only apply to ECO measures installed from 1 April 2015 to 31 March 2017.

Draft contents pages for the ECO2t Administration and Delivery guidance documents can be found in Chapter 1.

We expect to publish final versions of our ECO2t Administration and Delivery guidance documents as soon as we can, although this is likely to be after 1 April 2017.

Next steps

The consultation is open from 2 February 2017 to 16 February 2017. Please send your responses to: eco.consultation@ofgem.gov.uk.

During the ECO2t Part 2 consultation period we will conduct further stakeholder engagement about the proposed changes. This will give stakeholders an opportunity to further understand the proposals and provide feedback, which will be taken into account in our response.

We aim to publish our decision, including a summary of responses in April 2017. Unless marked confidential, all responses will be published on our website.

Useful links

BEIS Help to Heat consultation document

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/531 964/ECO Help to Heat Consultation Document for publication.pdf

BEIS Help to Heat consultation response

https://www.gov.uk/government/consultations/energy-company-obligation-ecohelp-to-heat

ECO2 Order

The Electricity and Gas (Energy Company Obligation) Order 2014: http://www.legislation.gov.uk/uksi/2014/3219/contents/made

Draft amendments to the ECO2 Order

https://www.gov.uk/government/uploads/system/uploads/attachment data/file/536 679/Illustrative draft of the Electricity and Gas Energy Company Obligation....p df

Ofgem Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation Part 1

https://www.ofgem.gov.uk/system/files/docs/2016/10/eco2t consultation part 1 2. pdf

Ofgem Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation response Part 1

https://www.ofgem.gov.uk/publications-and-updates/response-eco2t-consultation-part-one

ECO2 Guidance: Administration (V1.1)

https://www.ofgem.gov.uk/publications-and-updates/energy-company-obligation-2015-17-eco2-guidance-administration

ECO2 Guidance: Delivery (V1.1)

https://www.ofgem.gov.uk/publications-and-updates/energy-company-obligation-2015-17-eco2-quidance-delivery

1. Draft contents for ECO2t Guidance

The below contents pages are drafts for the Administration and Delivery guidance documents. This shows where we anticipate the proposed changes to affect the structure and content of the existing guidance documents.

ECO2t Guidance: Administration

1. Introduction

The ECO guidance
Information gathering powers
ECO Brokerage
Oueries and further information

2. Who is obligated under ECO2?

The obligation period
When is a licence-holder a 'supplier'?
Group of companies

3. Notifying customer numbers and supply

What suppliers must notify When suppliers must notify

4. Setting supplier obligations

Obligations for each phase

CERO increase

When we will notify suppliers of their obligations for each phase Zero obligations

5. Provisional solid wall minimum requirement

Provisional Solid Wall Minimum Requirement (PSWMR) Solid Wall Minimum Requirement (SWMR) What happens if a supplier doesn't meet its SWMR?

6. Surplus Actions

6. Home heating minimum requirement

7. Trading Obligations

The requirements for trading an obligation Submitting a trade application Approving a trade

8. Notification of completed measures

When a supplier must notify us of completed measures How to notify a measure Information suppliers must include as part of notification Errors in successful notifications Automatic extensions to the notification deadline

Applications for an extension to the notification deadline Monthly report to the Secretary of State Fair Processing

9. Re-elections and transfers

Re-election of obligations

Applying for approval to re-elect Approving a re-election Transfers of qualifying actions and surplus actions Applying for approval to transfer Approving a transfer application Following a transfer

10. End of the overall obligation period

Final determination of CSCO at the end of phase 2

The end of the overall obligation period Ahead of our final determination Final determination Our final report to the Secretary of State

Appendix 1 - Abbreviations

Appendix 2 – Overview of amendments to the guidance

Appendix 3 – Glossary

ECO2t Guidance: Delivery

1. Introduction

The ECO guidance
Information gathering powers
ECO Brokerage
Queries and further information

2. Achieving obligations

Promotion of a qualifying action Domestic premises

Extensions and new builds

Recommended measures (CERO and CSCO only)

Standards relating to the installation of ECO measures Installation of HHCRO measures Percentage of a measure that must be installed

3. Information on specific ECO measures

Solid wall insulation
Insulation of a cavity wall
Loft insulation
Connections to district heating systems
Relevant district heating connections

4. Carbon Emissions Reduction Obligation

Achieving CERO
Primary and secondary measures
The minimum condition
The rural minimum requirement

5. Carbon Saving Community Obligation

5. Home Heating Cost Reduction Obligation

Qualifying actions in HHCRO Home heating minimum requirement The private domestic premises requirement

The occupant requirements for measures delivered to private domestic premises

Social Housing E, F and G

Flexible eligibility - Local authority declarations

Routes for evidencing eligibility

Measures installed at non-gas fuelled premises

6. Information on determining ECO savings

Methodologies for determining savings

Measure lifetimes

Guarantee-dependent lifetimes for wall insulation

Demonstrating the accuracy of calculations

Identification of the pre main heating source for the property

7. Deemed scores

Using the deemed scores

Identification of property type

Identifying the number of bedrooms

Identification of wall type for heating measures

Percentage of measure installed and percentage of property treated

Measure specific guidance

Extensions

Delivery of multiple measures

8. SAP/RdSAP and other scoring information

SAP and RdSAP

District Heating Systems (DHS)

Scoring using Energy Performance Certificates

8a. Carbon Savings

Weighted average factor

In-use factors

Formula for calculating a lifetime carbon saving

8b. Cost Scores

General cost score methodology

Relevant HHCRO multipliers (RHMs)

7. Information on calculating ECO savings

7.a Calculating carbon savings

7.b Calculating cost scores

9. Notification of completed measures

When a supplier must notify us of completed measures

Notifying a completed measure

Automatic extensions to the notification deadline

Applications for an extension to the notification deadline

Fair Processing

10. Technical monitoring, score monitoring, audit and fraud prevention

The monitoring requirement

The monitoring process

Monitoring timelines Monitoring fails Our response to poor performance Audit Fraud Prevention

Appendix 1 – Documents and data to be made available on request

Appendix 2 – Evidencing the HHCRO premises and occupant requirements

Appendix 3 – Boiler Information Pack

Appendix 4 – Electric Storage Heaters (ESHs) Information Pack

Appendix 5 – Abbreviations

Appendix 6 – Overview of amendments to the guidance

Appendix 7 – Glossary



2. Rural minimum requirement

Draft guidance to accompany Chapter 2 of the ECO2t Part 2 consultation document.

Changes are shown in red.

ECO2 Guidance: Delivery

Chapter 4: Carbon Emissions Reduction Obligation

- 1.1. The Carbon Emissions Reduction Obligation (CERO) focuses on the installation of wall and roof insulation measures and connections to district heating systems. For CERO, these measures are referred to as 'primary measures'. Other insulation measures such as glazing and draught proofing are also eligible as 'secondary measures' if they are promoted at the same premises as a primary measure.
- 1.2. This chapter outlines the following:
 - a) what constitutes a 'carbon qualifying action',
 - b) what constitutes a primary and secondary measure, and
 - c) how primary measures can be used to support secondary measures.

Achieving CERO

- 1.3. A supplier must achieve its CERO by promoting carbon qualifying actions. Some of a supplier's overall CERO must be achieved by promoting solid wall insulation measures. This is known as a supplier's solid wall minimum requirement (SWMR) and is discussed in more detail in Chapter X of the ECO2 Guidance: Administration.
- 1.4. At least 15% of a supplier's phase 3 CERO must be achieved by promoting carbon qualifying actions in rural areas. We refer to this as a supplier's 'rural minimum requirement'. A rural area is as listed in the 2014 low income and rural document.³
- 1.5. A carbon qualifying action is the installation, at domestic premises^{4,} of a measure that:

³ See: https://www.gov.uk/government/publications/The-Future-of-the-Energy-Company-Obligation-Small-Area-Geographies-Eligible-for-ECO-CSCO-Support.

⁴ See Chapter X for information on domestic premises.

- a) is installed on or after 1 April 2015
- b) is installed in accordance with the Publicly Available Specification 2030:2016 Edition 15 (PAS) and by a PAS certified installer where the installation is referred to in the Specification.⁶
- where the measure is not specified in PAS, is installed in accordance with building regulations and any other regulations that relate to the installation of the measure, and
- except in the case of a connection to a district heating system (DHS), is a recommended measure.
- 1.6. CERO measures are divided into two broad groups:
 - a) **'primary measures'** including wall and roof insulation measures and relevant district heating connections⁷, and
 - b) 'secondary measures' including other insulation measures, such as glazing and draught proofing, installed at the same premises as a primary measure.

Primary and secondary measures

1.7. This section details which measures are considered to be primary measures, the eligibility requirements for primary and secondary measures, and the conditions which must be met for a primary measure to support a secondary measure.

Primary measures

- 1.8. A primary measure is⁸:
 - a) flat roof insulation
 - b) loft insulation
 - c) rafter insulation
 - d) room-in-roof insulation
 - e) wall insulation (insulation of a cavity wall or solid wall insulation)⁹

⁵ Please note that until XXXXXX we will accept certification to PAS 2030:2014 Edition 1 instead

⁶ See Chapter X for information on standards relating to the installation of a measure.

⁷ See Chapter X for information on relevant district heating connections.

⁸ See Chapter X for measure-specific information on certain primary measures.

⁹ This includes internal wall insulation (IWI), external wall insulation (EWI), cavity wall insulation (CWI) and party cavity wall insulation (PCWI).

- f) insulation of a mobile home, or
- g) a relevant district heating connection.
- 1.9. We use the term 'roof insulation' to refer to flat roof insulation, loft insulation, rafter insulation or room-in-roof insulation.

Secondary measures

- 1.10. A secondary measure is a measure, other than a primary measure, which is installed to improve the insulating properties of the premises.
- 1.11. In addition to the criteria set out in paragraph X.X, a secondary measure will not be considered a carbon qualifying action unless:
 - it is installed at the same premises where a primary measure(s) has been, or will be, installed,
 - b) it is installed by the same supplier that installed the primary measure(s) ('the supplier condition'), 10
 - it is installed no more than six months before or after the date on which the primary measure(s) is installed, ('the installation condition'), and
 - d) the primary measure, except relevant district heating connections and party cavity wall insulation, is installed to a specified minimum insulation level ('the minimum condition').
- 1.12. We refer to the primary measure that supports a secondary measure as a 'related primary measure'. More than one secondary measure may be supported by the same related primary measure.
- 1.13. The installation condition does not apply to relevant district heating connections, any secondary measure that is supported by a relevant district heating connection as its related primary measure. A relevant district heating connection can be installed at any point during the obligation period.

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¹⁰ This does not mean that the measure needs to be installed by the same installer.

The minimum condition

- 1.14. For a primary measure to support a secondary measure it must meet the minimum condition (except relevant district heating connections and party cavity wall insulation). To meet the minimum condition the primary measure must be installed to at least 50% of, as applicable:
 - a) the total exterior-facing wall area¹¹ of the premises
 - b) the total roof area¹² of the premises, or
 - c) the ceiling, floor and wall area of a mobile home.
- 1.15. In the case of loft insulation, to meet the minimum condition the loft must also be:
 - i. insulated to a depth of no greater than 150mm before installation, and
 - ii. insulated to a depth of at least 250mm after installation.
- 1.16. Where a primary measure does not meet the minimum condition (ie it is installed to less than 50% of the area and, in the case of loft insulation, to the required depth) it may still be an eligible primary measure, provided it meets the requirements relating to the percentage of a measure that must be installed.¹³ However, this installation cannot support a secondary measure and will not be considered a related primary measure.

Using more than one primary measure to meet the minimum condition

- 1.17. Suppliers can use more than one primary measure to meet the minimum condition and in turn support a secondary measure. ¹⁴ In such instances, both primary measures are considered related primary measures.
- 1.18. Where more than one type of wall insulation or roof insulation is used to treat the wall or roof area of a premises respectively, the percentage of the area that these measures are installed to can be added together to meet the minimum condition for that area. For example, where a premises has both solid and cavity walls, and more than one type of wall insulation is used to treat the exterior-facing wall area, the percentages of each can be added together to meet the minimum condition.

¹¹ See paragraph X for information on 'total exterior-facing wall area'.

¹² See paragraph X for information on 'total roof area'.

¹³ See Chapter X for information on the percentage of installation that must be completed.

¹⁴ Provided all other conditions specified in paragraph X.X and X.X are also met.

- 1.19. The secondary measure will only be eligible as a qualifying action after the minimum condition has been met. Therefore, where there is more than one related primary measure, the primary measure which results in the minimum condition being met should be notified as the 'associated measure' in the notification template. 15
- 1.20. In relation to the installation condition, the secondary measure must be installed no more than six months before or after the date of installation of the primary measure which results in the minimum condition being met.

The rural minimum requirement

- 1.21. A supplier must achieve at least 15% of its phase 3 CERO by promoting qualifying actions to domestic premises in rural areas. These measures must be installed from 1 April 2017.
- 1.22. We refer to this as the rural minimum requirement (RMR). At notification, a supplier should state whether it intends to claim a measure against its RMR.
- 1.23. Suppliers should refer to the 2014 low income and rural document 16, or use the online tool, ¹⁷ or an equivalent system, to ensure measures are installed in eligible rural areas.

¹⁵ We will provide a link to the notification template in the final ECO2t guidance documents.

¹⁶ See: https://www.gov.uk/government/publications/The-Future-of-the-Energy-Company- Obligation-Small-Area-Geographies-Eligible-for-ECO-CSCO-Support.

17 See: https://csco.locationcentre.co.uk/.

3. Flexible eligibility – local authority declarations

Draft guidance to accompany Chapter 1 of the ECO2t Part 2 consultation document.

These are entirely new sections of the guidance and will be inserted into the 'Home Heating Cost Reduction Obligation' chapter.

ECO2 Guidance: Delivery

Chapter 6: Home Heating Cost Reduction Obligation

Flexible eligibility - Local authority declarations

- 3.1. Measures delivered to private domestic premises are eligible where suppliers are able to provide Ofgem with a local authority (LA) declaration stating that the households listed in the declaration are:
 - i. living in fuel poverty (FP),
 - ii. living on a low income and vulnerable to the effects of living in a cold home (LIVC)¹⁸, or
 - iii. non-fuel poor but located in an immediately adjacent building to, in the same building as, or in the same terrace as households identified by an LA as FP or LIVC.
- 3.2. A local authority¹⁹ can provide declarations for households not within its administrative area under certain circumstances. For example, this includes where an LA delegates some functions to another LA, where the LA providing the service is best placed to make a determination of the eligibility of a household.
- 3.3. Properties owned or let by a social landlord can only be listed in an LA declaration where it is let by the social landlord at or above market rate, ie meeting the private domestic premises requirement. For more information on how to evidence market rate see Appendix X.

¹⁸ BEIS will provide guidance on what types of households would be deemed to meet the above two criteria. However an LA will maintain discretion and flexibility on whether to apply criteria that better reflect local needs.

¹⁹ Article 2(1) of the draft amendments to the ECO2 Order.

3.4. A supplier may deliver up to 10% of its HHCRO ECO2t obligation through this route.

Determining and evidencing household eligibility – Local authority declarations

- 3.5. Suppliers should ensure that a copy of the local authority declaration listing the household is available at audit.²⁰
- 3.6. The LA declaration must be dated prior to the installation of the measure and after the publication of the LA's statement of intent (SoI).
- 3.7. The responsibility lies with the LA to make the determination that a household is eligible (including in-fill). Ofgem does not require suppliers to undertake supplementary checks to determine eligibility once an LA declaration is made. Suppliers are entitled to rely on the LA having made an accurate assessment of eligibility. However, if we become aware of a local authority making false declarations, or where they do not follow the targeting methodology outlined in their SoI, we will pass this information to BEIS. This will not affect measures already notified to us based on declarations made by that LA.
- 3.8. When notifying flexible eligibility measures to Ofgem, suppliers will need to provide the URN²¹ of the completed LA declaration. This information should also be provided where the measure is notified as a HHCRO Help to Heat measure, rather than using up the flexible eligibility allowance. This information will be provided to BEIS for reporting purposes.
- 3.9. In-fill properties should be listed on the same LA declaration as the FP or LIVC households which allow them to be eligible. All households listed in a declaration are given the same URN. A separate URN is not required for each property.
- 3.10. Suppliers should be aware that Ofgem's primary interactions on measures submitted based on an LA declaration will be with suppliers, not LAs. Ofgem will not contact LAs to request missing information or query unclear information.

SWI in-fill - Local authority declarations

3.11. A LA can also declare households as eligible for HHCRO measures that do not meet the criteria for FP or LIVC where they are in the same terrace as, immediately adjoining, or in the same building as households that do meet those criteria. These properties are known as "in-fill".

²⁰ See Chapter X for information on audits.

²¹ Guidance on the format of URNs for local authority declarations is provided in the BEIS guidance note. We will provide a link once published.

- 3.12. Only SWI can be installed where the property is listed in the LA declaration as in-fill.
- 3.13. In-fill properties should be listed on the same LA declaration as household(s) that i) are in the same terrace as, ii) in an immediately adjacent building to or, iii) in the same building as households identified by an LA as FP or LIVC.
- 3.14. The specific requirements over the type and number of households that can be eligible as in-fill based on the presence of eligible FP or LIVC households are summarised in Table 2.

Property Type	LA declaration requirements	In-fill available
Semi-detached houses or bungalows, or a building containing no more than two domestic premises	At least one of the two- properties must be classified by the LA as Fuel Poor or LIVC (50% eligibility).	The other property to which it is directly adjoined is eligible for solid wall insulation.
Any other properties that are contained together on a list provided by the LA that are in the same or immediately adjacent buildings or in the same terrace (e.g. flats and terraced houses)	At least 66% of properties on the list must be classified by the LA as Fuel Poor or LIVC.	The other 34% of properties on the list are eligible for solid wall insulation, provided they are either in the same building, an immediately adjacent building or in the same terrace.

Table 2 Summary of the requirements for property types under in-fill

3.15. A detached household is only eligible where it is listed in an LA declaration as either FP or LIVC.

Statement of intent

- 3.16. To make LA declarations, an LA must produce a statement of intent (SoI) regarding its delivery of the ECO flexible eligibility provision. This SoI should be publically available (eg published on an LA's website) in order that it can be easily accessed by interested parties.
- 3.17. The supplier must be able to evidence that:
 - a) the SoI was made prior to any declarations being made by that LA, and
 - b) the SoI includes a methodology on how the LA intends to target households in FP or LIVC.

- 3.18. The supplier can provide evidence of the above by:
 - a. producing a screenshot of a published and dated SoI
 - b. producing a hardcopy of the SoI (this includes declarations provided in any LA report (eg the Home Energy Conservation Act 1995 report), or
 - c. any other means agreed with Ofgem.
- 3.19. Suppliers should be aware that a LA may update its SoI and publish a later version. In such circumstances the supplier should obtain assurance from the LA, that the LA had published its original version of the SoI prior to the date of the LA declaration. In such circumstances it is the earlier version publication date that should be recorded on the declaration.
- 3.20. Suppliers will need to check that a statement outlining the LA's targeting methodology is included in the SoI, but not assess the strength or validity of that methodology. Ofgem will not assess or approve local authority SoIs.
- 3.21. BEIS have published separate guidance for local authorities.²² This will provide guidance on the content of SoIs as well as the associated templates.

²² We will add a link to this document when it is published.

Roles and Responsibilities

3.22. The roles and responsibilities of different organisations in the administration of LA declarations are summarised in Table 3.

Organisation	Summary of roles and responsibilities
BEIS	Production and maintenance of LA guidance and associated templates
Local Authority	Production and publication of Statement of Intent (SoI)
	 Producing, authorising and issuing the declaration determining a household to be eligible, including URN
	Determining that a household is eligible for in-filling
	Retaining information to sufficiently evidence that a household meets the criteria outlined in the SoI for future reporting or audit
Supplier	Making available LA declarations on request
Заррнег	Checking that the LA has published a SoI, including a section on the methodology for identifying eligible households (note the supplier is not responsible for assessing the content – only that it exists)
	Checking and providing evidence on request that the date of LA declaration pre-dates the date of the installation of measures
Ofgem	Audit of LA declarations to ensure all required information is present and accurate
	Reviewing notification data for measures installed under the flexible eligibility provision

Table 3 Summary of roles and responsibilities for LA declarations