

Hello

Please find below comments on the OFGEM ECO2t consultation part 2. The comments are on behalf of both Dartford Borough Council (in Kent) and also Kent Energy Efficiency Partnership (KEEP) which is a group of Local Authority officers in Kent who are working on the Kent fuel poverty strategy and action plan and also energy efficiency schemes in the borough. These officers also have responsibility for their local authority Home Energy Conservation Reports which are currently being produced by Local Authorities

There are several points with this consultation that are key

1. To aid the Local Authorities with their HECA returns the guidance should include within the process that the suppliers should supply local authorities data showing the progress on the properties and any measures that are installed that are declared to them under flexible eligibility. The data should not purely be supplied to OFGEM. Without the data a local authority can not measure or monitor the impact that their actions have taken and won't be able to declare this in their HECA return either
2. The guidance is also very complex for local authorities to take on board in a very tight timescale for flexible eligibility to be in place by April 2017. In some instances a Local Authority may need to obtain cabinet approval to progress with a statement on intent etc., and the lead in times for this can be several months.
3. The consultation around the flexible eligibility has been primarily with the authorities involved in Green Deal Communities work – there are many other Las who would want to support this new process but they have not seen the guidance being suggested. The consultation around the flexible eligibility would be more rounded and meaningful if a broader selection of local authorities were involved. The process used for the consultation has widened the gap between the Las lucky enough to be granted green deal communities funding and other Las doing great energy efficiency works
4. The timing of the revised guidance around HECA/Help to Heat etc., is very tight for Las to include in this years HECA reporting

Please could you acknowledge receipt of these comments

I look forward to hearing back from you

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