



E.ON response to Ofgem's ECO transition 2017-2018 (ECO2t): ECO2t consultation Part 2

14 February 2017

Question 1

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

1. Yes, E.ON agrees that the LA declaration should be dated prior to the date of the installation of the measure.
2. It is essential however, to prevent ambiguity or confusion, that in the Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation Part 2 Draft Guidance paragraph 3.1.i. (page 15), should be reworded to "*living in fuel poverty (FP), or*".

Question 2

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

3. Yes, E.ON broadly agrees with the proposed administration of SWI in-fill.
4. The BEIS templates titled "BEIS' Guidance for Local Authorities on statement of intent and LA declaration", includes a footnote on page 12 (foot note 7) which states that "Ofgem will check the percentages in the declaration are correct – if not the declaration will be invalid. Ofgem will not carry out checks to ensure installations have occurred in all the properties". This is not reflected within the Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation Part 2 Draft Guidance published by Ofgem or mentioned in the Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation Part 2 Consultation, therefore E.ON requests that the guidance is updated to reflect this position.
5. E.ON also seeks clarification as to what implications there are for the number of eligible in-fill properties should the volume of LVC/FP households actually installed be fewer than the number of each category listed on the declaration.
6. We believe it should be made clearer in the guidance, specifically Table 2 under paragraph 3.14 of the Energy Company Obligation 2017-2018 (ECO2t): ECO2t consultation Part 2 Draft Guidance that SWI in-fill specifically relates to private tenure households.



Question 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?

7. Yes, E.ON agrees with Ofgem's proposed administrative approach.
8. It is essential that the statement of intent is dated and version controlled by the Local Authority. This is to ensure that suppliers can evidence that the original statement of intent was made prior to any declaration being issued.
9. Following measure installation, if it is determined that a Local Authority have made errors within their statement of intent or declaration, E.ON requires assurance that measures already delivered will not be subject to investigation or rejection by Ofgem.