

Response ID ANON-YP4Y-S7AG-8

Submitted to **ECO: Help to Heat Consultation**

Submitted on **2016-08-12 12:00:57**

Introduction

1 What is your name?

Name:

Hayley Macnamara

2 What is your email address?

Email:

hayley-macnamara@chcymru.org.uk

3 What is your organisation?

Organisation:

Community Housing Cymru

4 Please select your sector.

Trade associations

If 'Other', please specify:

Chapter 2. Purpose and structure of extension

1 Do you agree with our proposal to extend the current ECO by one year, whilst making improvements that transition to a longer-term fuel poverty focused obligation?

Yes

Where appropriate, use this space to justify your response.:

2 Do you agree with the proposal to re-balance the obligations for 2017-18; by increasing the Affordable Warmth obligation by £1.84bn notional lifetime bill savings (provisional figure), increasing the Carbon Emission Reduction Obligation by 3.0 MtCO₂ (provisional figure), and not increasing the Carbon Saving Community Obligation?

Yes

Where appropriate, use this space to justify your response. :

3 Do you agree that the CSCO deadline should remain at 31 March 2017?

Yes

Where appropriate, use this space to justify your response.:

4 Do you agree that there should be no rural sub-obligation from April 2017?

No

Where appropriate, use this space to justify your response.:

Rural fuel poverty is a significant issue in Wales and the removal of this sub-obligation may result in energy suppliers focusing their activity in more cost-effective areas. In Wales the proportion of rural households in fuel poverty is double that of households in urban areas. Investment should therefore continue to specifically target fuel poverty in rural communities.

Chapter 3: Affordable Warmth targeting and household eligibility criteria

5 Do you agree with our proposals to introduce income thresholds for 2017-18 which take account of household composition for Tax Credits and Universal Credit?

Yes

Where appropriate, use this space to justify your response.:

6 Do you agree with our proposal to adopt ten household composition types with relative income thresholds based on whether the household consists of a single person or a couple and whether they have one, two, three or four or more dependent children?

Yes

Where appropriate, use this space to justify your response.:

7 Do you agree with our proposals to allow recipients of other eligible benefits (Income Support, Income-based Jobseeker's Allowance and Income-related Employment and Support Allowance) to continue to be eligible and to remove the additional sub-criteria in 2017?

Yes

Where appropriate, use this space to justify your response.:

8 Do you think we should amend the eligibility requirements so that those in receipt of Guarantee Credit in Pension Credit continue to be eligible under Affordable Warmth but those only in receipt of Savings Credit should only qualify through CERO or if they meet the 'flexible eligibility' proposal?

Yes

Where appropriate, use this space to justify your response.:

9 Do you agree with the proposal to extend eligibility to social tenure households with an EPC rating of E, F or G for their home, and for no additional benefits criteria or income thresholds to be required?

Yes

Where appropriate, use this space to justify your response.:

Yes, however we believe that this extension does not go far enough and consideration should also be made to extend the eligibility to D rated social housing. In Wales housing associations are obliged to ensure that all properties meet a minimum SAP rating of 65 by 2010 in order to tackle fuel poverty. This is equivalent to a D SAP rating and is required under the Welsh Housing Quality Standard. It is important that Welsh Government and UK Government policy on addressing fuel poverty aligns.

10 Do you agree an EPC would be an appropriate way of proving the efficiency banding of social housing?

Yes

If applicable, please provide details of any additional assurance which should be required alongside EPCs, or details of alternative ways of evidencing which may be sufficient in certain cases.:

11 Do you agree that measures delivered in new build homes should not be eligible under ECO from 1 April 2017?

Yes

Where appropriate, use this space to justify your response.:

12 Do you agree with the proposal to allow flexible eligibility? If so, what proportion of the 2017-18 Affordable Warmth obligation do you believe that suppliers should be able to deliver using this flexible eligibility route? a) 10%b) 20%c) Other

Yes

a) 10%

Where appropriate, use this space to justify your response.:

13 Do you consider that solid wall insulation for non-fuel poor private tenure homes should be included under flexible eligibility as described in Chapter 3?

I do not have a strong view

Where appropriate, use this space to justify your response, including views on whether this should be allowed for measure types other than solid wall insulation.:

14 Do you agree with the proposal to allow local authorities to determine whether some households are eligible through 'local authority declarations' in the way proposed?

I do not have a strong view

Where appropriate, use this space to justify your response.:

15 Do you consider that schemes involving other intermediaries should be allowed, as described in Chapter 3, in addition to local authority declarations?

I do not have a strong view

Where appropriate, use this space to justify your response, including whether there are any viable alternatives that meet the policy intent.:

Chapter 4: Eligible energy efficiency measures

16 Do you agree with the proposal aimed at limiting the delivery of qualifying gas boiler replacements (and not limiting other types of heating measure)?

I do not have a strong view

Where appropriate, use this space to justify your response, and describe any preferred alternative proposal, if applicable.:

17 Do you agree that only measures installed after a specified date should count towards the Affordable Warmth minimum, and that date should be 1 July 2016?

I do not have a strong view

Where appropriate, use this space to justify your response, and describe any preferred alternative proposal, if applicable.:

18 Do you agree with the proposal to in effect limit the delivery of qualifying gas boiler replacements at a level equivalent to 25,000 boilers under the ECO extension?

I do not have a strong view

Where appropriate, use this space to justify your response, and describe any preferred alternative proposal, if applicable.:

19 Do you agree with our proposal not to impose new limits on the level of installation of the following measures?

Q19.1 - a) Heating controls:

I do not have a strong view

Q19.1 - b) First time central heating:

I do not have a strong view

Q19.1 - c) Non-gas qualifying boilers:

I do not have a strong view

Q19.1 - d) Non-qualifying boilers:

I do not have a strong view

Q19.1 - e) Electric storage heaters:

I do not have a strong view

Q19.1 - f) Renewable heating:

I do not have a strong view

Q19.1 - g) Heat networks:

I do not have a strong view

Where appropriate, use this space to justify your response.:

20 Do you have views on whether Government should take action to prevent shifting the balance of measures delivered and the potential for energy suppliers to receive disproportionate benefit under ECO from renewable heating supported by RHI payments?

I do not have a strong view

Where appropriate, use this space to justify your response and set out what action should be taken (if any).:

21 Do you consider that heat network schemes funded or part funded by the supplier obligation should be required to include arrangements for consumer protection?

I do not have a strong view

Where appropriate, use this space to justify your response, including suggestions for appropriate consumer protection arrangements.:

22 Do you agree with the proposal to allow insulation but not to allow boiler or other heating system replacements or repairs (of any fuel type) in social tenure properties, with the exception of first time central heating (including district heating) and renewable heat?

No

Where appropriate, use this space to justify your response.:

23 Do you agree that we should retain a solid wall minimum within the scheme?

I do not have a strong view

Where appropriate, use this space to justify your response.:

24 Do you agree that the proposed solid wall minimum is set at the right level?

I do not have a strong view

Where appropriate, use this space to justify your response and, if applicable, describe any alternative preferred proposals. (Where you provide alternative proposals, please include the level you recommend and what else you would change as a consequence, noting the need to stay within the overall spending envelope.):

25 Do you agree that an in-use factor of 15% should be applied to party wall insulation measures delivered under CERO after 31 March 2017?

I do not have a strong view

Where appropriate, use this space to justify your response.:

26 Do you agree that party wall insulation measures installed after 31 March 2017 should support secondary measures?

I do not have a strong view

Where appropriate, use this space to justify your response.:

Chapter 5: Delivery and administration

27 Do you agree that the requirement for measures to be recommended on either a GDAR or a CSR should be removed from 1 April 2017?

Yes

Where appropriate, use this space to justify your response.:

28 Do you have views on whether any alternative requirements should be introduced in order to provide consumer advice, or ensure technical suitability of a measure prior to its installation?

I do not have a strong view

Where appropriate, use this space to justify your response and provide details of any alternative requirements you consider to be needed (if applicable).:

29 Do you agree that from 1 April 2017 we should move to a system of deemed scoring, as described in Chapter 5, rather than the current bespoke RdSAP or SAP based property by property assessments?

I do not have a strong view

Where appropriate, use this space to justify your response, including details of any alternative proposals you would support, if applicable.:

30 Do you agree that savings for district heating system measures should be calculated based on bespoke SAP or RdSAP assessments, rather than deemed scores?

I do not have a strong view

Where appropriate, use this space to justify your response.:

31 Do you agree that up to 5% of each supplier's measures should be granted automatic extensions for up to three months?

I do not have a strong view

Where appropriate, use this space to justify your response.:

32 Do you agree with removing the restriction on extensions where it is due to supplier administrative oversight?

I do not have a strong view

Where appropriate, use this space to justify your response.:

33 Do you agree that we should introduce a mechanism for the trading of obligations between licensed suppliers?

I do not have a strong view

Where appropriate, use this space to justify your response.:

34 Do you agree that Ofgem E-Serve should approve trades, to ensure that energy suppliers can bear the consequences of non-compliance?

I do not have a strong view

Where appropriate, use this space to justify your response, and explain any alternative suggestions, if applicable.:

35 Do you agree the version of PAS 2030 cited in the ECO regulations should be updated to refer to the most recent version, following the anticipated updates to PAS 2030?

I do not have a strong view

Where appropriate, use this space to justify your response.:

36 Do you agree that installation companies delivering measures which are referred to in PAS 2030 under the extension to ECO should be certified against the requirements set out in PAS 2030?

I do not have a strong view

Where appropriate, use this space to justify your response.:

37 Do you think there is value in collecting and publishing more information on ECO costs in the future?

Yes

If you do, what information do you think should be collected and how should it be obtained?:

38 Do you agree that, with the exception of the Affordable Warmth minimum requirement, the new scheme rules being proposed should be introduced for measures installed from 1 April 2017?

I do not have a strong view

Where appropriate, use this space to justify your response, including details of any particular rules that should be introduced earlier or later, if applicable.:

39 Government invites views on whether we should introduce any additional rules to incentivise greater delivery to areas with higher delivery costs?

I do not have a strong view

Where appropriate, use this space to justify your response, and set out how additional rules should work (if applicable).:

40 Should a brokerage mechanism be continued?

I do not have a strong view

Where appropriate, use this space to justify your response and, if responded 'yes', what value do you think a brokerage mechanism could add in the future?:

41 If a brokerage mechanism continued in the future, what eligibility criteria and due diligence checks should be carried out to enable access to a range of organisations?

Where appropriate, use this space to justify your response.:

42 Should access for an individual organisation be reviewed for any reason (eg at certain intervals or for certain behaviours)?

I do not have a strong view

Where appropriate, use this space to justify your response and, if responded 'yes', what should be considered as part of the review?:

43 Is brokerage a barrier to local delivery?

I do not have a strong view

Where appropriate, use this space to justify your response and, if 'yes', explain how it is a barrier and your recommendations (if applicable) for how we could remove the barrier(s) to improve local delivery under brokerage.:

44 Does the current performance rating system provide the assurance of quality and delivery needed?

I do not have a strong view

Where appropriate, use this space to justify your response and, if 'no', what changes would you recommend?:

45 If brokerage continued, would you recommend any substantial changes to its design to better reflect the future fuel poverty focus?

I do not have a strong view

Where appropriate, use this space to justify your response.:

Chapter 6: Second set of reforms (2018-2022)

46 Government invites views on the aspects of the future supplier obligation (eg measures, scoring, objectives) where a Scottish scheme could diverge from the GB-wide scheme without increasing the administration or policy costs unreasonably.

Views on areas where Scottish scheme could diverge from GB-scheme:

47 When would you consider that differences between an English and Welsh scheme and a Scottish scheme could be detrimental to the operation and competition of the United Kingdom-wide energy market?

Differences between schemes detrimental to UK competition:

48 Do you believe there is any justification for changing the customer number threshold in the future obligation (2018 onwards)?

I do not have a strong view

Please provide specific reasons and evidence and, if you responded 'yes', describe any actions you recommend in relation to addressing the proportionally higher fixed costs that may be borne by smaller obligated suppliers.:

49 Do you believe there is any justification for changing the taper for newly obligated suppliers in the future obligation (2018 onwards)?

I do not have a strong view

Please provide specific reasons and evidence and, if you responded 'yes', describe how you recommend amending the taper.:

50 Under current and previous supplier obligations, are there barriers in scheme design inhibiting innovation in delivery models and technologies?

I do not have a strong view

If you responded 'yes', how should we design the scheme in order to overcome these barriers and incentivise the delivery of innovative products, technologies and delivery models in a future supplier obligation?:

51 Government invites views on what specific improvements could be made to the design of the ECO scheme to facilitate administration and delivery.

Use this space to provide specific recommendations for improvements which could be made.: