

**Issued:** 24 July 2013

**Respond by:** 16 September 2013

DECC ECO Team  
Department of Energy & Climate Change  
1 Floor Area C  
3 Whitehall Place  
London  
SW1A 2AW

Email: [lottiejones@decc.gsi.gov.uk](mailto:lottiejones@decc.gsi.gov.uk)

Reference: URN 13D/167 Energy Company Obligation (ECO): Updates to the Electricity and Gas (Energy Companies Obligation) Order 2012

Compiled by Gabby Mallett  
Head of Green Deal, Communities and Secretariat Services  
National Energy Foundation  
13th September 2013

**Q1. Do you agree with the Government's proposal to align the scoring of window panes, window units and other ECO measures?**

**Yes.** It is often advisable to replace windows at the same time as undertaking the installation of Solid Wall Insulation. Indeed it may make sense to replace windows which have not reached the end of their financially efficient lives if that removes the need for them to be replaced in the near future.

Any incentive which encourages installers to provide the best applicable service should be encouraged.

**Q2. Do you agree that the six-month rule for delivery of a DHS as a secondary measure under the CERO should be removed?**

**Yes.** However in practise this will only provide a small window of opportunity for the installation of District Heating Schemes as the end of ECO1 has already been established. When the consultation response is published there will only be six months before the measures need to be reported. A better response would be to investigate ways of extending the reporting period past the March '15 deadline. Alternatively a mid term report could be introduced where the measure is noted, but not logged until installed, thereby enabling installation post March 2015.

**Q3. Do you agree with the proposal to replace the requirement that solid wall insulation must reduce the U-Value of treated walls to “0.3W/m2k or less” from the ECO Order with a more flexible reference to meeting the requirements of the Building Regulations?**

**No.** This is the minimum which we should be aiming for. We should be looking to sequentially improve this target with each edition of ECO. Whilst there are cases where the additional depth of insulation may cause issues there is usually a thinner product which could be substituted to achieve the desired effect. The use of thinner alternatives will also encourage the market for alternative products.

Where Solid Wall Insulation is concerned it is unlikely that there will be further chances to retrofit these properties and we should ensure that all efforts are made to get the best possible thermal performance at the outset. Watering down this requirement will open the system to abuse.

Where there may now be a limited number of exceptional homes where this requirement is problematic, reducing the requirement will allow installers to choose cheaper and less thermally efficient products as the norm rather than specifying the most efficient product from the outset.

**Q4. Do you agree with the proposal to align the rules for “excess actions” and “qualifying actions” in the ECO Order?**

**No Comment**

**Q5. Do you agree with the Government’s proposal to clarify the wording in the Order to make clear the circumstances in which ECO measures can be installed in rented properties during “void” periods?**

**Yes.** Void periods are, by far, the most sensible time to undertake works which involve major disruption. Where floor insulation, Internal Wall Insulation, changes to the Heating Systems etc are concerned there are many cases where it is advisable that the occupants vacate the property. This involves huge disruption and additional cost. For those planning to live in their homes whilst the works are completed the ensuing disruption and potential health impacts can often be enough to prevent the occupier from signing up to the works. Undertaking the renovations whilst the property is void removes this major obstacle to undertaking significant retrofit of domestic properties.

It should also be noted that many rented properties are almost constantly let and void periods are few and far between. If these periods are not utilised when they arise it may be that the property is not renovated at all.

The current guidance is unclear and open to abuse. The new guidance should be unambiguous and realistic.

**Q6. Do you agree that the ECO AWG eligibility criteria should be updated to include UC recipients in a way which mirrors, as closely as practicable under the UC system, the approach taken for current AWG eligible working age benefits/tax credits?**

**Yes.**