

By email: beisecoteam@beis.gov.uk

6 August 2019

Dear Energy Efficiency and Local Directorate,

Consultation reference: ECO3: Improving consumer protection

Further to your consultation, please find following the response from YES Energy Solutions.

Q1.

We agree and welcome with the principles of TrustMark driving improvements in the areas of: standards; practice: quality and consistency across the sector, while also seeing some consolidation so there is a less confusing situation, providing greater clarity for customers and installers. We particularly welcome a 'one stop mark' for customers, building trust and recognition.

With any change, there is a need to have a broad targeted marketing to ensure prospective customers understand the purpose and trust they can place in the TrustMark, as well as knowing where they can check to ensure the use of the Trustmark logo is valid for any contractor.

Securing the Trustmark, needs to be at a low or no cost option to installers. TrustMark should not be a profit-making venture, as any increase in cost to contractors will be passed onto customers. This is of particular concern where schemes or action is targeted to support and support those in fuel poverty or where local authorities are delivering schemes for those less well off, as any increased cost will reduce the extent of work possible, such as through ECO.

Q2.

Yes, there should be an integration of the certifications required, making the approach simpler for householders to act.

Q3.

Where TrustMark is implemented it should universally cover all measures delivered under ECO. One area of ECO we feel does not fully fit under the current scope of TrustMark is the provision of energy efficiency advice. As this becomes a more essential element of the

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engagement with householders, it should be considered for inclusion, and hence providers requiring certification under TrustMark.

Q4.

We agree there should be a source of protection for customers, for any installation. However there is a discrepancy between the guarantees provided on new build properties under the NHBC scheme and for retrofit measures. We would defer to organisations such as CIGA who have greater knowledge and data on the need and extent of warranty protection in the sector.

Q5.

No comment.

Q6.

Yes

Q7.

We agree the current direction of travel in respect to energy vectors but without a viable, and affordable, option to deliver under ECO, there is the likelihood the customers we engage with daily, in desperate need of help and support, would not be addressed should the 400% uplift be removed, without a viable alternative in place. An increase in the broken boiler cap would support more activity. Notwithstanding other options BEIS should use a robust evidence-based approach regarding any changes to this element of ECO3.

Q8.

We support the change from 12 - 20 years with deemed scores reflecting the change. However we are concerned the obligated energy companies will simply reduce the funding to negate the impacts on their delivery, reducing volumes. We would support a 'target' to ensure FTCH measures are still delivered and also to ensure renewable energy is a financially viable option in the consideration for FTCH installations.

Q9.

Yes, we agree. Furthermore we would support a removal of EPC restrictions for private rented sector as these residents are typically the most fuel poor.

Q10.

Yes, we agree, this will increase the scope of eligibility.

Q11.

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The target of late 2019 is a very ambitious target for TrustMark certification and at odds with the longer term PAS2035 transition, which is likely to be realistic. TrustMark and PAS should be to the same timescales.

Q12.

Though we appreciate the need for better compliance and consumer protection, the impact of any additional cost on the funder of fuel poverty alleviation schemes (such as Local Authorities) or in individual circumstances, householders, needs to be fully identified and justified. This scheme is focused completely on people living in fuel poverty and we feel these additional costs will negatively impact ECO3 while delivering the essential benefits of increases in the areas of: standards; practice: quality and consistency across the sector.

Solid wall insulation is the measure which can provide one of the greatest benefits to householders. The current eligibility criteria for this measure is proving prohibitive in a number of situations. We believe if the qualifying criteria was removed, just for this measure, further value would be achieved by reducing carbon emissions, in the same way CERO did.

Large EWI schemes are progressing despite ECO and the government is missing out on capturing the carbon emission reduction of this. Recommend BEIS consider a greater uplift in SWI measures deemed scores.

SWI minimum requirements is not proportionate to the total number of properties that are there.

Energy Advice should be involved more centrally in ECO. Energy efficiency advice should be an intrinsic element of the ECO delivery in the future. Delivered through accredited and audited organisations who are under the TrustMark.

Please feel free to contact us if you have any requirement for clarification or additional information regarding our response.

Yours sincerely

A handwritten signature in black ink, appearing to read "Duncan McCombie".

Duncan McCombie
Chief Executive

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