

# Consultation Response

## Energy Company Obligation ECO4: 2022 – 2026.

Department for Business, Energy and Industrial Strategy (BEIS)

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Contact: [david.southgate@ageuk.org.uk](mailto:david.southgate@ageuk.org.uk)

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Age UK  
Tavis House  
1-6 Tavistock Square  
London WC1H 9NA  
T 0800 169 80 80 F 020 3033 1000  
E [policy@ageuk.org.uk](mailto:policy@ageuk.org.uk)  
[www.ageuk.org.uk](http://www.ageuk.org.uk)

Age UK is a charitable company limited by guarantee and registered in England (registered charity number 1128267 and registered company number 6825798). The registered address is Tavis House  
1-6 Tavistock Square, London WC1H 9NA.

## **About this consultation**

The Department for Business, Energy, and Industrial Strategy (BEIS) has proposed an extension to the Energy Company Obligation (ECO) through to 2026. Proposals for ECO4 include changes to eligibility criteria, new restrictions and alterations to the Local Authority (LA) and Supplier Flex. The Savings Credit Component of Pensions Credit has been added to the eligibility criteria but non-means tested benefits, such as disability benefits, have been removed. There are also changes to the types of heating system which will be supported. These sit alongside proposals for a reduction and eventual removal of supplier obligation thresholds. ECO4 supports a 'worst first' approach and incentivises whole house retrofits wherever possible.

## **Key points and recommendations**

- Age UK believes there is a strong case for extending and reforming the ECO scheme, but recommends changes to BEIS's proposals.
- BEIS should push for the legislative changes required for ECO4 to be in place before the start of the scheme, to avoid any disruption to delivery.
- An additional referral route should be added to the LA and Supplier Flex to ensure those living with disabilities and long-term health conditions are better supported by ECO4.
- Eligibility for LA and Supplier Flex referral route one should be adapted to account for estimated household costs based on age and other household characteristics.
- We call for recipients of Warm Home Discount (WHD) Industry Initiatives to be retrospectively included in the ECO4 eligibility criteria.
- Current proposals for a 22,000 Solid Wall Minimum are insufficient, we suggest an increase to at least 70,000 per year to meet statutory targets for fuel poor homes.
- We welcome increases in the length of guarantees provided and suggest an aim of 6–10-year guarantees for loft insulation and 10 years for boilers wherever feasible.
- Future proposals for placing a higher cost onto gas prices should be offset by greater support for households who are fuel poor or in low income to meet these costs.
- Whilst we are supportive of finding viable alternatives to gas central heating where possible, exceptions should be allowed in contexts where connection to the gas grid is the most feasible method of providing central heating.
- ECO4 should be adaptable in subsequent scheme years if flaws in implementation or access for particular consumers are identified, particularly given the proposed changes to the scoring methodology.

## **About Age UK**

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe, and secure at home; and feel valued and able to participate.

## Introduction

We welcome the opportunity to respond to this consultation. Age UK greatly supports the continuation and expansion of the Energy Company Obligation (ECO) through to 2026. Previous iterations of ECO have supported older consumers' access to a wide range of household energy efficiency improvements since the scheme's inception. We welcome ECO4's renewed focus on low income and vulnerable households in the context of post-pandemic energy price rises. Support for the principle of assisting the 'worst first' when it comes to energy efficiency is also welcome. Whilst we support the proposals for continuing and expanding ECO4 we are recommending a number of changes to the proposals. These are designed to better represent the issues of older people in the design of ECO4 and ensure the longer-term success of the scheme.

In certain areas BEIS has not gone far enough in its proposals. In order to ensure that ECO4 links up with BEIS's proposed changes to the Warm Home Discount (WHD), we have called for recipients of the scheme's Industry Initiatives to be included in the ECO4 eligibility criteria – alongside those in Core Group 1 and 2. We have also suggested extended guarantees for specific measures such as loft insulation and boilers – suggesting a target of 6-10 years for loft insulation and 10 years for boilers wherever feasible. BEIS's proposed Solid Wall Minimum is also insufficient. Current proposals are for a minimum of just 22,000 solid wall upgrades to be installed per year, but fuel poverty and energy efficiency data suggest that an increase to at least 70,000 would be required to meet statutory targets for fuel poor homes.

BEIS have also proposed restrictions on certain heating systems. Whilst we are supportive of, where possible, finding viable alternatives to gas central heating, exceptions should be allowed where connections to the gas grid are the most feasible method of providing central heating. Environmentally friendly alternatives to oil and liquefied petroleum gas (LPG) heating systems should be prioritised wherever possible, but if no alternative can be provided then ultimate priority should be given to maintaining the consumer's access to heating. It is also important that any future proposals for placing a higher cost onto gas prices should be offset by greater financial support for households who are fuel poor or on a low income. This will help to ensure a fair transition for older consumers as we move towards net-zero. More broadly, it is important that the cost of energy is minimised wherever possible to ensure consumers do not overpay to heat their homes.

ECO4 eligibility will continue to rely predominantly on access to certain benefits. Whilst this is positive for those who receive them, it also presents challenges for fuel poor households not eligible for or not receiving income support. In this regard, it is positive to see a greater degree of flexibility to the LA and Supplier Flex delivery mechanism which should provide more adaptive provision. Particularly welcome is the inclusion of an NHS referral route which we hope will provide direct support to older consumers with health conditions which make them more vulnerable to the effects of a cold home. We hope that BEIS will provide additional training and support for clinicians to help identify those who would benefit from energy efficiency measures. Clinicians should also be afforded a greater degree of discretion in relation to the eligible health conditions. Including a disability referral route is also essential to support those with disabilities or long-term health conditions. This is particularly important given that BEIS has removed non-means tested benefits, including disability benefits, from ECO4's eligibility criteria.

BEIS and Ofgem must also ensure that clear publicly available monitoring processes are embedded into ECO4, with public data and reports being produced annually to monitor implementation in real-time. Data and reports on programme implementation must include breakdowns by age to monitor whether the scheme is adequately supporting older consumers. It is essential that ECO4 be adaptable in subsequent scheme years if flaws in both implementation or

access for particular consumers are identified. This is particularly important given the sweeping reforms proposed to the scoring methodology and the scope for gaming this new system.

The Government must set out the legislation necessary for the delivery of ECO4 as soon as possible. We caution that without legislative change being made prior to ECO4's commencement, BEIS risks creating substantial disruption to scheme delivery.

Overall, we welcome the extension and reform of ECO4 through to 2026. The proposed reforms should serve to support the goals of the Energy White Paper and improve energy efficiency in older people's homes. Our responses to the consultation questions reflect our concern that certain aspects of the proposals need to better account for the issues faced by older consumers. Our proposed alterations are intended to improve accessibility and ultimately the level of support provided for vulnerable and fuel poor older people, and we hope that BEIS will consider our recommendations carefully.

**Question 1: Do you agree with removing the supplier obligation threshold when a buy-out mechanism is introduced and retaining the current thresholds, for when a supplier becomes obligated, in the meantime?**

The buy-out mechanism has been proposed primarily to support smaller suppliers. It will allow suppliers to pay a fee instead of meeting their ECO4 obligation through installing energy efficiency measures. This allows them to 'buy-out' their obligation in cases where the administrative cost is too prohibitive (e.g. a small supplier with only 1,001 customers). The pot of money collected from buy-out fees would then be used to deliver energy efficiency measures. BEIS has proposed that the buy-out include a sliding scale approach. This would mean that smaller suppliers can buy-out a larger portion of their ECO4 obligation with larger suppliers being able to buy-out less.

We welcome the removal of the supplier obligation and agree with a buy-out mechanism for small suppliers. We recommend that the legislative primary powers required for the buy-out to be implemented are brought forward as quickly as possible.

**Question 2: Do you agree with the proposal to reduce the current supplier allowance approach at the start of ECO4, before a buy-out mechanism could be introduced?**

Yes we agree with this approach.

**Question 3: How feasible would it be for suppliers to pass on a greater share of obligation costs onto gas prices rather than electricity during ECO4 or beyond?**

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**Question 4: How feasible would it be for suppliers to recover costs of obligation exclusively from gas customers during ECO4 or beyond?**

We are concerned that passing costs onto gas could create an additional financial burden for fuel poor or low-income households who rely on gas to heat their homes. Whilst we recognise the need to reduce domestic carbon emissions, new policies must ensure that this is not done at the expense of the most vulnerable consumers. Hundreds of thousands of older people often struggle to access schemes such as ECO or the WHD which may make it harder for them to transition away from gas boilers at the same rate as the wider population. We recommend that any future proposals for placing a higher financial burden onto gas prices are offset by additional support to meet increased costs for households who are fuel poor or on a low income. More broadly, it is important that the cost of energy is minimised wherever possible to ensure consumers do not overpay to heat their homes.

**Question 5: Do you agree with our proposal of not introducing the new mechanism to protect the ECO target under ECO4 when a supplier ceases to trade, and its obligation target is not met?**

When a supplier fails, the Government and regulator should step in as a last resort to cover any missed ECO commitments. It is also crucial that there is better data matching in the event of a supplier failing. This will enable more efficient transfer of a customer's ECO eligibility and any upcoming planned installations. At a minimum, we believe that best practice from existing government energy programmes should be used in ECO4. Under the WHD, Ofgem incentivises existing suppliers to take over obligations of a failed supplier (e.g. Ofgem taking WHD commitments into account in appointing the supplier of last resort). A similar mechanism of incentives could be used to encourage suppliers to take over the ECO commitments of failed suppliers.

**Question 6: Do you agree with the proposal to (a) introduce a buy-out mechanism, to enable smaller suppliers to participate under ECO without disproportionate costs to them (subject to primary legislation); and (b) do you agree that the use of buy-out should be optional for all suppliers?**

We are supportive of the buy-out mechanism for small suppliers with less than 150,000 customers but we are not convinced of the benefits of extending this to larger suppliers. This is primarily because at this stage we do not know the precise design of the buy-out mechanism. Whilst smaller suppliers could buy-out and then redistribute this money so that the measures could be collectively funded, if larger suppliers can also do the same then we are concerned that this may impact upon implementation. Our main concerns are where the buy-out money would be distributed, who will administer it and whether this will result in the same or better efficiency of rollout for energy efficiency measures. We welcome BEIS's commitment to a full consultation to discuss these aspects before we can commit to supporting a buy-out for larger suppliers. We also emphasise the need to accelerate the primary legislation required to facilitate the buy-out mechanism.

**Question 7: Do you agree that the buy-out pot should be used to deliver energy efficiency measures?**

We agree with this approach but reinforce the need for a full consultation to discuss the implementation of the buy-out mechanism. This is particularly important in order to address issues

affecting the distribution of the buy-out money, who will administer it and whether this will result in the same or better efficiency of rollout for ECO measures.

**Question 8: Do you agree that all suppliers should be able to use the buy-out mechanism using a sliding scale approach?**

Without seeing full details of the proposals it is not possible to answer this question – BEIS should publish these as soon as possible. However, should the buy-out policy address our concerns around implementation, then a sliding scale would seem a sensible approach in cases where it has not been possible for a supplier to fully utilise their ECO spend on energy efficiency measures. If this approach is implemented, we recommend that BEIS and Ofgem monitor the level of access to the buy-out option by suppliers and produce regular reports on its use. This will make it easier to ensure compliance with the proposed thresholds and for external organisations to assess the impact of the policy on the implementation of efficiency measures.

**Question 9: If a sliding scale was used, do you agree that the proposed potential buy-out caps above are set at the right level?**

We agree with this approach subject to satisfactory proposals within the buy-out consultation which address our concerns with implementation, as outlined above.

**Question 10: Do you think that very small suppliers with; (a) 1,000 customer accounts or below, regardless of their supply volumes, should not be obligated (option 1 in table 4); OR (b) do you think suppliers with less than 5,000 customer accounts, with supply volumes of 66GWh gas and 18 GWh electricity should not be obligated (Option 2 in table 4)?**

We support option 1 in table 4 (option a) as it will make the scheme simpler, standardise its customer thresholds with the new thresholds proposed for the WHD, and is likely to marginally increase the number of customers who are supported by ECO. However, to address the issues of low supply volume for some suppliers, we would also support a compromise solution whereby option 1 has a proportionate supply volume component.

**Question 11: Do you agree that (a) an approach using published prices reported by suppliers on ECO delivery and administration costs would be appropriate to set the buy-out price on an annual basis ahead of the buy-out 'window'? (b) Please suggest any alternative approaches.**

We agree with the approach outlined in option a.

**Question 12: Do you agree that suppliers should decide on whether to buy-out or not during a 'decision window' which is prior to the start of the next obligation phase?**

We agree with this approach.

**Question 13: Do you agree that suppliers can only choose to buy-out their next obligation phase?**

We agree with this approach, particularly as it will provide greater certainty regarding the total buy-out pot. However, we wish to highlight that one of the justifications for allowing larger suppliers to take part in the buy-out is to allow flexible delivery and enable suppliers to manage any unforeseen delivery risks during a scheme. This flexibility may be undermined if suppliers are only able to enact the buy-out for their next obligation phase, thereby reducing the justification for larger suppliers to use the buy-out.

**Question 14: Do you agree with our proposal to allow up to 10% ECO3 delivery to be carried over into the ECO4 scheme (with the exception of oil and LPG fuelled heating systems)?**

**Question 15: Do you agree with our methodology for converting ECO3 bill savings into ECO4 bill savings?**

We agree with this approach.

**Question 17: Is carry-under needed to mitigate the risk of suppliers failing to meet their ECO3 obligations?**

Carry-under is an important mechanism for ensuring compliance with previous commitments under ECO3. We welcome its inclusion.

**Question 18: Do you agree with the proposed cap of 10% and penalty rate of a 1.1 multiplier if carry-under is implemented?**

We agree with this approach.

**Question 20: Do you agree with our proposal for early delivery during any potential gap between schemes?**

We agree with this approach.

**Question 21: Do you agree that ECO should target SAP band D, E, F and G homes?**

We agree with this approach.

**Question 22: Do you agree that band F and G homes should be improved to at least a SAP band D, and that band D and E homes should be improved to at least a SAP band C, as a minimum requirement to receive a full project score?**

We support this approach. It is important that as many of the least energy efficient homes as possible are moved to at least band C or D, but we recognise that it is not always practical or economically viable to do so. Given the Government's 2035 target of getting as many homes to

band C as possible, we welcome BEIS's commitment to incentivise installers to upgrade F and G band properties to band C wherever practical. We welcome the higher project score incentive for these installers and request that BEIS regularly reports on the degree to which this motivation is sufficient in incentivising improvements beyond band D.

**Question 23: Do you agree to a requirement for a minimum number of private tenure homes in SAP band E, F and G homes to be upgraded?**

We agree with this approach.

**Question 24: Do you agree with the proposal to (a) remove non means tested benefits including disability benefits as a method to target low income and vulnerable households, as listed in table 6?; and (b) include additional benefits within the eligibility criteria for private tenure households under ECO4 to align with UC?**

Regarding point a, BEIS has put forward a strong case for removing non-means tested benefits from the ECO eligibility criteria as it would improve the scheme's fuel poverty targeting rate. We understand the reasoning behind this approach but reinforce the need for additional flexible measures. In particular, we support the additional support that a reformed LA and Supplier Flex could provide for those with disabilities or long-term health conditions who are just outside of the threshold for means tested benefits but still cannot afford to make adjustments to their homes.

We would ask that an additional referral route be added to LA and Supplier Flex to ensure that those living with disabilities and long-term health conditions are better accounted for in ECO4. This referral route should give priority to those with disabilities or long-term health conditions which are exacerbated by living in a cold home.

Whilst it is likely that proposed referral route one will cover large portions of those in receipt of non-means tested benefits who are still considered to be in low income there will be gaps for certain people with disabilities and long-term health conditions (e.g. an older person with disabilities living in London in a multigenerational household where the household income is above £31,000 but where living costs and expenses render it impractical to afford energy efficiency improvements). Referral route three (NHS referral route) may also cover aspects of this proposed route. But the limitations of the NHS referral route are that it requires someone to present to the NHS, have a clinician recognise the need for referral and for them to meet the presently proposed health condition criteria. However, particularly for those who have disabilities or long-term health conditions which do not meet the existing criteria, this is unlikely to be sufficient. We therefore recommend that an additional referral route is created. See our response to Q29 for further details.

In terms of point b, we support the inclusion of additional benefits to the eligibility criteria for ECO4. We particularly welcome the inclusion of Pension Credit Savings Credit. However, we would like to reinforce that using benefits as a proxy for low income is inhibited by the lack of access to certain benefits amongst older people and the wider population. A large proportion of older people eligible for Pension Credit Guarantee Credit (PCGC) are not in receipt of it. Department for Work and Pensions (DWP) data from 2019 on PCGC uptake<sup>1</sup> show that an estimated 30% of those eligible (or 560,000 people) do not take-up the benefit. This group of 560,000 will likely have a higher fuel poverty rate than those receiving PCGC. Further improvements to the fuel poverty targeting rate of ECO4 can only be achieved with improvements to the accessibility of PCGC. BEIS needs to

commit to better supporting PCGC and wider benefit enrolment amongst eligible older people. It is also important that BEIS support those who fall just outside of the eligibility criteria for means-tested benefits. Flexibility should be shown to people whose income or capital means they narrowly miss out on a means-tested benefit but still require support.

**Question 26: Do you agree with the proposal that households in receipt of WHD also be eligible under ECO4, if they live in band D-G homes?**

We strongly welcome this eligibility criteria for ECO4. We are particularly pleased to see that the new Core Group 1 (previously named Core Group) and Core Group 2 (previously named Broader Group) WHD recipients will be included automatically within ECO4's eligibility criteria.

To build upon this further BEIS should also include recipients of WHD Industry Initiatives. Given the expected issues with data matching for the new Core Group 2 of the WHD, it is important that Industry Initiative recipients are also included as eligible for ECO4. Those identified as requiring debt relief through the WHD Industry Initiatives and the newly proposed disability Industry Initiative may otherwise have missed out on the financial support provided by the rebate. The disability Industry Initiative is particularly relevant to ECO4 given the removal of disability benefits from the eligibility criteria.

Whilst some of these people will be covered by the referral routes in LA and Supplier Flex, there will still be gaps in provision which could result in some of the most vulnerable consumers being excluded from ECO4. We are aware that if individuals are not registered as receiving support under an Industry Initiative it will make it difficult to prove eligibility. We recommend that those who have been in receipt of any kind of WHD Industry Initiative rebate or support measure should be able to use this as evidence of their eligibility for ECO4. This would result in their ECO4 eligibility being retrospective, but would ensure that their eligibility could be verified.

**Question 27: Do you agree that up to 50% of the ECO target could be delivered through LA & Supplier Flex?**

We welcome the proposed split of the target. Allocating 50% of the fund to LA and Supplier Flex allows ECO4 to be more responsive to a broader range of needs as these measures allow a greater degree of flexibility to the way that ECO funding is distributed. This will ensure that older fuel poor households who are not in receipt of the existing eligibility criteria, such as certain means tested benefits, will still be able to access support based on their specific circumstances. This is critical for targeting households who are the most disconnected or excluded from society.

Whilst we support the proposed split of the target we reinforce the need for implementation to be publicly monitored to ensure an efficient rollout of provision. This is particularly important in ensuring that LA and Supplier Flex supports those with low household incomes. To reduce the risk of underspend it is essential that BEIS also provide additional support to local authorities. This will ensure that they have the resources to efficiently allocate the ECO4 spend.

**Question 28: Do you agree with the proposals for improved due diligence under the reformed LA & Supplier Flex?**

There is a difficult balance between ensuring that the resources of ECO4 are well targeted to low-income households whilst ensuring that enough flexibility is provided in the scheme to make it adaptable to local needs. Local authorities and suppliers are often in a better place to assess the circumstances of those would benefit most from ECO support. For a supplier this may be identifying pre-payment meter (PPM) customers who are regularly self-disconnecting. We support the inclusion of greater funding for the LA and Supplier Flex as well as the proposed due diligence checks.

However, we reinforce the need for the LA and Supplier Flex audits conducted by Ofgem to be transparent, accessible, and published soon after the end of a scheme year to ensure appropriate evaluation of ECO referrals. Given the existing time delay of 2 years on BEIS's fuel poverty statistics it is very difficult for Age UK to scrutinise the effective implementation and impact of LA and Supplier Flex measures for older people living in fuel poor households. At present, the Government's fuel poverty statistics are not broken down by age at local authority level. This makes it impossible to assess the impact of LA and Supplier Flex on different age cohorts.

BEIS must commit to providing a more timely and accessible method for third-party organisations to assess the impact of the LA and Supplier Flex measures through to 2026. This must include reducing the delay window for publication of their fuel poverty statistics from 2 years to 1 year and including data on LA and Supplier Flex measures on the same LA and local authority district (LAD) dataset. BEIS should also commit to ensuring that a wider range of demographics (such as breakdown by age) are included in their local authority, local authority district, and constituency level fuel poverty datasets. Whilst Age UK agrees with the due diligence proposals, without the ability to scrutinise the existing data sources it is very difficult to hold local authorities to account and ensure that the flexibility provided by LA and Supplier Flex is being used to support low income or vulnerable consumers.

Furthermore, we understand the concerns regarding the sole use of customer self-declarations as evidence to verify a household's income given that there have been issues with the low income targeting of some measures. It is important that any secondary evidence which is required can be submitted both online and offline.

**Question 29: Do you agree with the four referral routes that could be used by local authorities under LA & Supplier Flex? Are there other ways we could incentivise better targeting?**

**Referral route one:** We agree with the principle of a referral route which accounts for income, as this will support low-income households who are not in receipt of benefits. However, we note the absence of any adjustment to the proposed threshold of £31,000 based on household costs. Older people heat their homes for longer periods of time<sup>2</sup> and make up a larger proportion of excess winter deaths<sup>3</sup>. Whilst older households may have an income just over the £31,000 threshold, they will often face higher energy costs and live in less energy efficient homes compared to other age groups. Multi-generational households are also increasingly common<sup>4</sup>. Higher occupancy will likely inflate the overall household income, but residents may face increased costs to heat the home and run appliances. Whilst the additional referral routes may account for the impact on these households, it is important that route one can support as many homes as possible. We recommend adapting referral route one to account for estimated household costs based on age and other household characteristics. These additional characteristics should include area of the floor plan, age of the property, type of property and type of heating system.

**Referral route two:** This referral route is a welcome addition but if a household is in a Lower Layer Super Output Area (LSOA) 1-3 and has been identified as having someone who is vulnerable to living in a cold home then these criteria should be sufficient to qualify for route two. Householders should not also have to qualify through a third eligibility criteria.

**Referral route three:** Age UK welcomes the addition of referral route three but proposes several changes. The limitations of the NHS referral route are that it requires someone to present to the NHS and have an NHS member of staff recognise their need and make the referral. Whilst this may be sufficient in many cases, we would encourage training, support and resources be provided to NHS staff to assist in identification of those who are eligible. We also encourage a degree of flexibility and clinician discretion in this referral route. Whilst we agree with and welcome the broad range of health conditions included within the proposed eligibility criteria, we support the provision of additional scope for clinicians to make a judgement call regarding their patients. This must firstly include patients who a clinician identifies as at risk of developing a health condition which makes them vulnerable to the cold, but who are yet to be diagnosed with a specific qualifying condition. Secondly, clinicians should also be given flexibility on the eligible health criteria. This will allow support for patients who have a condition not listed on the specified criteria (such as diabetes) but who may still be vulnerable to the effects of living in a cold home. Lack of support for those without a qualifying medical issue could lead to a worsening condition for patients discharged into a cold home. Ensuring this flexibility will make referral route three a useful tool for wider care planning.

**Referral route four:** We are interested in the opportunities this referral route may provide, particularly as it offers the opportunity for local authorities to deliver targeted referrals to those aged 60+. This degree of flexibility is welcome and would give local authorities the ability to tackle specific issues impacting older people in their area. However, much like the due diligence audits conducted by Ofgem, we would want to see Ofgem review instances of a local authority utilising referral route four in order to assess its viability and demonstrate whether it improves the targeting of low income, fuel poor and vulnerable households in a given area.

**Additional referral route:** We ask that an additional referral route be added based on the removal of disability benefits from the eligibility criteria for ECO4. Eligibility for this route would be determined by someone in the household being in receipt of disability benefits or having a disability or long-term health condition. It should serve as an additional separate route from the existing proposed ones and give priority to those with disabilities or long-term health conditions which are exacerbated by living in a cold home. This will ensure that people with disabilities and long-term health conditions are better accounted for in LA and Supplier Flex. In providing this additional route, BEIS would also fill a major gap in the existing ECO4 proposals as it moves to remove disability benefits from the standard eligibility criteria.

Households consisting of someone with a disability or long-term health condition comprise almost half (45.6%) of all fuel poor households in England<sup>5</sup>. Fuel poverty rates for those with disabilities or long-term health conditions are also much higher (17.1%) than for those without (11.4%), with 1,447,000 fuel poor households comprising of someone with a disability or long-term health condition<sup>6</sup>. This leaves a significant degree of uncertainty regarding the number of people who could receive support via this referral route. We would therefore call for additional funding for this referral route to ensure it can facilitate adequate provision. BEIS should commit to promoting the scheme through a range of online and offline channels including print media, mail drops, and community and voluntary organisations. Suppliers could also signpost those with declared disabilities who are on the Priority Services Register (PSR). Whilst referrals could be made by a range of organisations (e.g. housing or energy advisors, energy suppliers, local authorities) we

request a more detailed consultation on this proposed referral route which would outline who would be eligible to refer people in.

**Question 30: Do you agree that obligated energy suppliers should (a) be able to use their own data on households in fuel debt, or PPM self-disconnections to target low income and vulnerable householders; and (b) households would be eligible if they meet the 2-proxy requirements, using suppliers own customer debt or PPM self-disconnections data under LA & Supplier Flex route 2?**

We agree with this approach.

**Question 33: Do you agree if a measure is funded under ECO, then other grant funded schemes should be prohibited from blending with the same measure under ECO?**

We argue that when a specific measure is significantly expensive and cannot be covered by a single scheme alone (either because the totality of measures have reached the single scheme cap or the single measure is more than the cap) funding from multiple schemes should be permitted. Given the renewed push for supporting the installation of heat pumps, and the high cost of installation, it would be better to be able to combine funding sources such as ECO, Clean Heat Grant (CHG) and Home Upgrade Grant (HUG) to fund measures that could not be fully funded by one scheme alone. This should be reserved for those on the lowest income for whom expensive energy saving measures, such as heat pumps, would not be an option unless the full cost, or the majority, is covered by government schemes.

We therefore recommend a slightly more flexible approach when it comes to significantly expensive measures such as heat pumps. This is particularly important given the changing nature of Government support over ECO4's lifetime and because the provisions within the Heat and Building Strategy are yet to be released.

**Question 34: Do you agree homes could benefit from multiple funding if (a) it is not for the same measure; and (b) if other grant funded measures are installed either before ECO4 or after all the ECO4 measures?**

We agree with this approach in general, except we would like to add the exception outlined in our answer to question 33 (i.e. when a specific measure is significantly expensive and cannot be covered by a single scheme alone multiple funding sources should be permitted).

**Question 35: Do you agree that we continue with the ECO Eligible Referrals mechanism under ECO4?**

We agree with this approach.

**Question 36: Do you agree with our proposals to (a) simplify the in-fill mechanism with the new ratios for flats and other housing to qualify?; and (b) include CWI in-fill?**

We welcome the 1:1 ratio for flats and the addition of cavity wall insulation to the in-fill mechanism. We understand that cavity wall insulation (CWI) will not be included for houses. However, we ask that BEIS provides a fuller rationale to make it clearer how this exclusion was decided upon.

**Question 37: Do you agree with our proposal to (a) support low-income private rental households, with the design being subject to the outcome of the PRS consultation; and (b) limit support to packages of measures that meet the MR including solid wall insulation, first-time central heating, a renewable heating system or district heating?**

We welcome the commitment to support low-income private rental households. However, we would encourage flexibility in the measures which can be supported in the rental sector. There may be specific circumstances in which the criteria need to be more flexible to ensure higher uptake. We believe that restricting the minimum criteria to include solid wall insulation, first-time central heating, a renewable heating system, or district heating is too restrictive.

**Question 38: Do you agree with the proposal to (a) allow social housing tenure with starting bands of E, F and G to be eligible under ECO4; and (b) continue eligibility for band D social housing under Innovation Measures?**

We agree with this approach. As with the private rental sector (PRS), we would encourage flexibility in the measures which can be supported in the social housing sector. There may be specific circumstances in which the criteria need to be more flexible. Therefore, we would suggest that restricting the criteria to include insulation, first-time central heating, a renewable heating system, and district heating is too restrictive.

**Question 39: Do you agree that the minimum requirements should apply to E, F and G social housing and band D social housing for IMs?**

We agree with this approach.

**Question 40: Do you agree that the scope of the Home Heating Cost Reduction Obligation (HHCRO) should be broadened to a Home Energy Cost Reduction Obligation?**

We agree with this approach and urge the Government to bring forward primary legislation so this can be delivered as early in the ECO4 scheme as possible.

**Question 41: Do you agree with our proposal to maintain a Solid Wall Minimum Requirement set at 22,000 solid wall insulation measures per year for ECO4 and remove the option for this to be met via alternative measures?**

Analysis of the Household Energy Efficiency<sup>7</sup> and Fuel Poverty<sup>8</sup> statistics suggests that a 22,000 Solid Wall Minimum Requirement is substantially deficient in meeting the Government's fuel

poverty and energy efficiency targets by 2025 and 2030. 420,000 fuel poor households live in solid wall properties rated EPC E, F and G. All of these properties will need to get support in order to meet the existing target of all fuel poor homes reaching EPC band D by 2025. Whilst ECO will not be the only support scheme available, it is likely to be the largest. Without setting a higher ambition for solid wall insulation this energy efficiency target is unlikely to be met, negatively impacting upon the more ambitious 2030 band C target for fuel poor households. Age UK therefore supports an increase in the Solid Wall Minimum Requirement to at least 70,000 per year.

**Question 42: Do you agree with our proposal to introduce the proposed minimum insulation preconditions for all homes receiving heating measures?**

We agree with this proposal.

**Question 43: Do you agree with our proposal to exclude the repair and replacement of oil and LPG heating?**

This is only an acceptable approach if ECO4 can guarantee replacement of these oil and LPG systems with a suitable alternative. If no alternative can be provided or the consumer refuses replacement measures, then priority should be given to maintaining the consumers access to heating above all other concerns. To minimise the risk of consumers being left without heating, in cases where a heat pump or other alternative is not viable then a gas network connection should be provided to allow access to a gas system.

**Question 44: Do you agree with our proposal to only allow the repair of efficient heating up to a cap of 5,000 homes per year?**

If consumers have alternative support in place via ECO4 (such as heating replacements) then we can support this approach as an initial measure, as it will allow BEIS to monitor gaming risks. However, we would ask BEIS to make an assessment after the first scheme year as to the efficacy of the cap and commit to lifting the cap if gaming risks are minimal.

**Question 45: Do you agree with our proposal to reduce the Broken Heating Cap for broken efficient heating replacements up to 5,000 homes per year?**

It is positive to see that inefficient heating systems are excluded from this cap. However, we would never want to see a circumstance in which an older consumer has an efficient heating system breakdown, but they are unable to receive support as the cap has already been reached. If BEIS insist on enforcing this cap, we would request the inclusion of a last line of resort. This could be facilitated through LA and Supplier Flex to ensure that no low-income or vulnerable older person is left without a heating system.

**Question 47: Do you agree with our proposal to require all new gas boilers installed throughout GB to meet the Boiler Plus standards?**

We agree with this proposal.

**Question 48: Do you agree with our proposal to restrict gas first-time gas central heating to households already connected to the gas grid?**

Whilst we are supportive of finding viable alternatives to gas central heating exceptions should be allowed where connection to the gas grid is the most feasible method of providing central heating. This may be because of the relative cost of the gas connection versus an alternative or because of barriers to installation (e.g. some properties lack the 1 meter boundary clearance which is often required for the installation of an air source heat pump). We particularly welcome exceptions in cases where an oil or LPG heating system is being replaced and a heat pump or other alternative is not viable. In these cases a gas network connection should be provided to allow access to a gas system.

**Question 49: Do you agree with our proposal for all new wet central heating systems to be installed as a “low-temperature heating system”?**

We agree with this approach but welcome BEIS’s proposal for exemptions to allow for flexibility in certain circumstances.

**Question 50: Do you agree with our proposals to expand the eligibility for first-time central heating?**

We agree with the expansion of first-time central heating (FTCH) but we would ask for further detail on why BEIS has put in place restrictions on when FTCH will be implemented.

**Question 52: Do you agree with our proposal to restrict the installation of electric heating (that is, or equivalent to, a high heat retention electric storage heater) to homes that are already electrically heated and where it is not reasonable or practicable to install a hydronic heat pump, district heating system or a solid biomass heating system?**

As above, we encourage flexibility here.

**Question 53: Do you agree with our proposal that energy suppliers should be required to provide advice on the benefits of smart meters and how to request the installation of a smart meter alongside the energy advice requirements required by PAS 2035?**

Smart prepayment meters are an important tool in addressing fuel poverty and meeting the Government’s net zero target<sup>9</sup>. We welcome the inclusion of advice regarding prepayment smart meters within ECO4 but encourage BEIS to review the Government’s own smart meter advice guidance to ensure that the information provided is tailored to the needs of consumers. Early research conducted by BEIS showed that older people were amongst the least likely to feel that the displays on smart meters were easy to interact with<sup>10</sup>. Advice provided about installation of smart meters and in home displays (IHDs) must reflect the needs of the household and support older consumers to engage with their new meter. For example, vulnerable consumers should be identified and made aware of the availability of accessible in-home displays (AIHDs) and their

functionality. Installers and engineers should be provided with training to identify vulnerability and establishing the precise nature of customer needs through conversation guides and scripts<sup>11</sup>. It is also critical that any smart meter advice provided by suppliers is reviewed to ensure it does not pressurise consumers to take-up a smart meter, particularly if a consumer is vulnerable and more likely to suffer confusion or anxiety as a result<sup>12</sup>.

**Question 55: Do you agree that the ECO4 scoring methodology must be based on the difference in average annual bill expenditure between the starting SAP rating and finishing SAP rating of a property, with regard given to the property's floor area?**

We agree in principle with including the difference in average annual bill expenditure and including the property's floor area within this calculation. In theory we agree that this will better account for estimated savings on bills. However, we are concerned that aspects of this methodology could lead to a reduction in support for older consumers based on their consumer behaviour. Retired households have the highest median fuel costs and older homes are often less energy efficient<sup>13</sup>. Older people frequently spend longer at home and are more likely to require more heating and energy whilst they often live in homes with a larger floor area<sup>14</sup>. Therefore, whilst we support the proposals in principle we require reassurances that the new system will not bias ECO4 support against particular groups. For example, the inclusion of a property's floor area as an additional aspect in this calculation may work in theory, but in practice it could result in a reduced level of support being provided for older consumers if suppliers or installers are inadvertently incentivised to avoid larger properties for particular measures.

BEIS and Ofgem must commit to monitoring the level of support provided through ECO4 for homes based on household age, relative to the level of ECO4 eligibility within each age group. Adding additional scoring metrics such as anticipated energy reductions and floor area are, in principle, positive. But it is crucial that BEIS and Ofgem monitor implementation to ensure that suppliers do not avoid supporting older households in cases where their consumer behaviour or property makeup, such as larger floor areas, may make it harder to get a full project score or reach the minimum requirements (MRs). Monitoring implementation of ECO4 measures by age will ensure accountability, particularly if these measures are broken down by supplier and local authority. We would ask BEIS and Ofgem to ensure that clear publicly available monitoring processes are embedded into ECO4 with public data and reports being produced annually to monitor implementation in real-time. ECO4 should be designed to ensure adaptability in subsequent scheme years should flaws in implementation be identified.

**Question 56: Do you agree that the overarching ECO4 scores should be based on deemed savings, rather than the actual savings generated through bespoke SAP calculations at each property?**

We agree with this proposed approach on the basis that bespoke actual savings calculations increase the risk of gaming and are more complex and uncertain. However, we would reinforce the points made in our response to question 55 that the new scoring system must be publicly monitored annually and the scheme should remain adaptable if issues in the methodology are identified.

**Question 57: Do you agree with our proposed approach for allowing exemptions to the minimum requirements? If you propose additional exemptions, please suggest how they could be evidenced.**

BEIS has proposed that where consumer preference would mean a minimum requirement (MR) is not met, the consumer can only reject or accept the whole package of measures. Whilst this makes sense in principle, in practice it produces a rigid approach to the ECO4 rollout which does not adapt to consumer needs. In limited circumstances consumers may have reservations regarding specific measures. This may be based on a concern regarding the lack of local installers or maintenance providers to service equipment (e.g. heat pumps) or because of the distress or anxiety the installation of some measures may cause (as seen in some cases during the smart meter rollout<sup>15</sup>). The proposed approach could result in some people not engaging with the scheme. At a minimum, contingency measures should be put in place so that consumers who refuse ECO efficiency installations can be supported through other schemes.

**Question 58: Do you agree with our proposal to use deflated partial project scores for ongoing projects, ahead of completion?**

We agree with this proposal but reinforce the need to monitor this aspect of ECO4's scoring system to reduce the likelihood of gaming.

**Question 59: Do you agree with our proposal to use deflated partial project scores where a project is found to be non-compliant with the minimum requirement at the point of notification?**

We agree with this proposal but again reinforce the need to monitor this aspect of ECO4's scoring system to reduce the likelihood of gaming.

**Question 60: Do you agree with our proposal to use deflated partial project scores where a consumer ends a project before the minimum requirement has been met for reasons other than change of occupancy?**

We agree with this proposal.

**Question 63: Do you agree with our proposal to incentivise the use of longer lifetime measures through minimum requirements and heating insulation preconditions rather than including measure lifetimes in ECO4 scores?**

We agree with this proposal as a way of ensuring a multiple measures approach is practicable. However, we reinforce our previous point that BEIS and Ofgem should provide public data and reports on the implementation of ECO4 on an annual basis. This should facilitate a real-time review of the scoring methodology and allow for adaptability of the scheme throughout its duration. If this review reveals flaws in the new longer-term incentivisation method, then BEIS should reconsider its approach as the scheme progresses.

**Question 64: Do you agree that we should continue to require measure lifetimes through the scheme to benchmark guarantee requirements and for scheme reporting purposes outside of the scoring framework?**

We agree with this approach.

**Question 65: Do you agree with our methodology for applying innovation uplifts relative to the expected savings of a particular innovation measure type?**

Older people are more likely to be owner occupiers<sup>16</sup>. They also make up a disproportionate amount of excess winter deaths<sup>17</sup>. We are therefore concerned that the removal of the uplifts for LA Flex F & G non-PRS properties may unduly impact on older households. We call on BEIS to maintain the LA Flex F & G non-PRS uplift in order to ensure that suppliers are further incentivised to support vulnerable older consumers.

**Question 66: Do you agree with our proposal to provide a fixed score uplift of ~£60 annual bill savings for all broken boiler replacements and ~£16 annual bill savings for each broken ESH replacement?**

**Please provide information on the cost of boiler and ESH repairs to help inform the level of uplift required for heating repairs relative to replacements.**

We agree in principle with the need for uplifts to incentivise boiler and electric storage heater (ESH) repairs. We suggest that the precise value of the uplift is reviewed either annually or at the mid-point of the scheme to assess whether inflation has impacted upon the suitability of the proposed scores.

**Question 67: Do you agree with our proposal to allow uplifts for hard-to-treat issues for owner-occupied E, F, and G homes only?**

Whilst we agree with the principle of supporting the 'worst first', we disagree with the justification for excluding band D properties on the basis of them requiring reduced measures to reach band C. In some instances, hard-to-treat issues (HTT) may make it impractical to implement measures to bring a band D property up to band C. As a result, excluding band D properties in all cases may result in reduced support. Whilst band E, F and G homes should be prioritised we encourage flexibility in relation to band D homes in cases where a HTT makes it impractical to bring the property up to band C.

**Question 71: Do you agree with our approach for evidencing scores for ECO4?**

We agree with this approach.

**Question 80: Do you agree with setting a project completion time of three months, from the completion of the first measure in any package other than for DHS? We welcome views regarding what timescale should be permitted for DHS installations.**

Whilst we understand that a three-month window will give installers the time and scope to install a range of measures, we encourage BEIS to seek methods of further reducing this window wherever possible. We request that BEIS and Ofgem emphasise that 3 months is the maximum window and that installers should aim to complete projects more quickly than this wherever possible. This is particularly important in the winter months.

**Question 81: Do you agree with our proposal to allow an extension of three months to be permitted by Ofgem in certain circumstances?**

We agree with this level of flexibility.

**Question 82: Do you agree with our proposal to award deflated partial project scores for measures delivered after the three-month time period has passed?**

We agree with this approach.

**Question 83: Do you agree with the proposals on measure notifications and extensions?**

We agree with the proposals.

**Question 84: Do you agree with (a) the proposed obligation phases for the future scheme; and (b) the proposal to retain the 1 February deadline for suppliers to notify Ofgem, and for suppliers to be notified of their obligation on or before 7 March, prior to the commencement of the next phase?**

We agree with this approach.

**Question 85: Do you agree with the proposal to retain the mechanism for the trading of obligations and setting the deadline for applications as 30 September 2025?**

We agree with the proposal.

**Question 86: Do you agree with the proposal to retain the mechanism for the transfer of qualifying actions and setting the deadline for applications as 30 June 2026?**

We agree with the proposal.

**Question 87: Do you agree that an application for the transfer of qualifying actions should not be approved, if there is significant risk that the applicant supplier would be unable to deliver its obligation?**

We agree with the proposal.

**Question 89: Should the guarantee durations for loft insulation and boilers be increased and to what duration?**

We strongly agree with increases in the length of guarantee provided for loft insulation and boilers as this will provide additional support for consumers. We support extensions to boiler guarantees and welcome BEIS's commitment to investigate their extension beyond the present two-year standard. Whilst extensions may present technical issues, they will also provide much needed reassurance for older consumers and will increase confidence in the installation process. Recent consumer research has shown that certain brands can provide a far more reliable boiler with fewer faults six or more years after installation<sup>18</sup>. We would ask that BEIS support the installation of boilers which have a lower fault rate and greater longevity. This will allow for extensions to the guarantee, improved consumer confidence and will reduce the risk of older people being left without heating. With improved boiler standards we would call for BEIS to seek a ten-year guarantee at a minimum wherever practicable, whilst balancing scheme costs and delivery. We would also caution that extended guarantees may also come with expensive maintenance plans. As a result, the guarantee length will need to be balanced against related ongoing costs for consumers.

We also welcome the Government's commitment to exploring solutions to technical monitoring failures for loft insulation measures. Any strengthening of consumer protections through extended guarantees would be welcome. Whilst we are unable to provide technical expertise in relation to an appropriate guarantee length, it is our understanding from the consultation process that loft insulation often comes with a 6-10 year guarantee. We would call for any guarantees to match or exceed these levels.

**Question 92: Do you agree that all measures (excluding DHS) referenced in the latest versions of PAS2035 and PAS2030 should be installed in accordance with these standards and delivered by a PAS-certified installer?**

We agree with this approach.

**Question 96: Do you agree with our proposal to expand on the current criteria for determining whether there is an improvement to include environmental impact consumer care, and delivery costs?**

We welcome the inclusion of increased consumer care to the criteria for Innovation Measure (IM) uplifts. Rewarding measures which come with customer support, such as advice services or aftercare, are an excellent addition. As has been seen with the smart meter rollout, there are often barriers to engagement with new measures in the home for older consumers<sup>19</sup>. Well-structured customer care can reduce these issues<sup>20</sup>.

Research conducted by Joseph Rowntree Foundation (JRF)<sup>21</sup> and Citizens Advice<sup>22</sup> during the rollout has suggested that customer support which is tailored to the needs of the household can also improve vulnerable consumer engagement with new measures. There is a difficult balance between providing additional advice and avoiding creating additional concerns for vulnerable consumers regarding third party installers and the functionality of the new in-home measures<sup>23</sup>. We strongly support the inclusion of increased consumer care but would recommend BEIS and Ofgem

encourage a tailored approach to consumer advice based on household needs, particularly for vulnerable consumers.

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