



Briefing 14/20 April 2014

Response to Consultation document on the Future of the Energy Company Obligation

To: all contacts

Key issues

Changes to Energy Companies Obligation

Changes to resources available for schemes for local authorities and householders

Significant implications for local authorities and a need for them to re-assess their investment plans

1. APSE

The Association for Public Service Excellence (APSE) represents council officers and members involved in the management and provision of quality public services. APSE's mission statement positions the organisation as "networking organisation which consults, develops, promotes and advises on best practice in the delivery of public services". APSE is currently working with almost 300 authorities within the United Kingdom. APSE members are local authorities and a small number of other public service providers.

2. Introduction

DECC issued 'The future of the Energy Company Obligation' consultation document and it can be found [here](#). It provides details following the announcement of changes to ECO and the Green Deal December 4th 2013. This was a day before the Autumn Statement which included an announcement to reduce "green levies" on energy bills. It is claimed that this will reduce domestic energy bills by about £50 per year. The reduction would be in supplier costs and it would have to be passed on from the energy supplier to the customer in reduced bills.

3. Summary of consultation proposals

Subject to the outcome of this consultation, the Government proposes to make the following changes to ECO:

- set new targets for each of the ECO sub obligations based on an equivalent level of ambition as the 2015 targets, including the proposed 2015 CERO target, and to be met in the period April 2015 to March 2017.

Changes proposed to apply in relation to the current obligation period (ending March 2015)

- To reduce the March 2015 Carbon Emissions Reduction Obligation (CERO) target by 33 per cent. The March 2015 Carbon Saving Community Obligation (CSCO) and Affordable Warmth (also known as the Home Heating Cost Reduction Obligation (HHCRO)) targets will remain the same.
- To enable obligated energy suppliers to carry forward a certain proportion of over delivery against their March 2015 targets to count towards their March 2017 targets.
- To enable obligated energy suppliers to deliver less than their share of the new 2015 CERO target. In which case, the energy supplier would see its CERO obligation for March 2017 increase by 1.1 times its shortfall in March 2015. This flexibility would not apply to the Affordable Warmth or CSCO targets, with both remaining enforceable compliance deadlines at 31 March 2015.
- To enable obligated companies to more fully realise the benefits of carry forward of over-performance (excess actions) to ECO from the predecessor schemes (Carbon Emissions Reduction Target

(CERT)/Community Energy Saving Programme (CESP), by changing the legislation to facilitate the optimal distribution of excess actions across suppliers licences.

- To enable those energy suppliers that have delivered primary measures of more than 35 per cent of Phases 1 and 2 of their current CERO target, by the end of March 2014, to receive 1.75 times the carbon score for primary measures delivered to that date (or to adjust these suppliers' CERO targets to provide for the same effect). Activity carried forward from CERT/CESP would be excluded from this uplift. This uplift would only apply to primary measures under CERO and not to the other two ECO obligations.
- To extend the CSCO element of ECO from 15 per cent to the 25 per cent lowest areas on the Index of Multiple Deprivation. In addition, the qualifying criteria for the CSCO rural sub obligation would be simplified by allowing suppliers to deliver against this sub-target to any domestic property located in the poorest quarter of rural areas, as well as to people living in rural areas who are members of the Affordable Warmth Group. These changes are proposed to apply for measures installed from 1 April 2014.
- To allow District Heating connections made from 1 April 2014 to be included as an allowable primary measure under CERO.
- To allow insulation of easy to treat cavity walls installed from 1 April 2014 to be included as an allowable primary measure under CERO.
- To allow loft insulation installed from 1 April 2014 to be included as an allowable primary measure under CERO.
- To require the delivery of a minimum level of solid wall insulation to be delivered by the end of March 2017 across all companies and both carbon elements of ECO, namely CSCO and CERO. There will be no other measure specific sub-targets.

Changes proposed to apply for the first time in relation to a proposed new obligation period commencing on 1 April 2015

- To extend the ECO scheme to March 2017 with new targets imposed for CERO, CSCO and Affordable Warmth at a pro rata of the March 2015 levels. Further detail on the proposed methodology is provided within the accompanying Assessment of Impacts.
- To allow an uplifted Affordable Warmth score for measures delivered to households whose main fuel type is not natural gas.
- To provide that electric storage heaters, that are broken or not functioning efficiently, which are repaired or replaced under Affordable Warmth are scored in the same way as a "qualifying boiler" and in doing so, receive a higher notional bill saving.
- To require all boiler replacements delivered under Affordable Warmth to include a minimum warranty.
- To safeguard the Energy Saving Advice Service (ESAS) referrals service for households likely to be eligible for support under Affordable Warmth.
- To improve the transparency and availability of cost information relating to delivery of the ECO scheme.

As indicated above, they propose that certain changes should have effect by 1 April 2014. However, if these changes are made, the amending legislation will not be in place until later in 2014. Ofgem will continue to administer ECO in accordance with the current ECO Order, until the amendments are made. They also propose that, if these proposed changes are made, measures installed (for the purposes of this document installed in this context means installation completed) from 1 April 2014 onwards should be able to be reported to Ofgem within one month of the change in legislation coming into effect.

Changes to the Green Deal and ECO were published on the DECC website on December 4th 2013. This was a day before the Autumn Statement which included an announcement to reduce "green levies" on energy bills. It is claimed that this will reduce domestic energy bills by about £50 per year. The reduction would be in supplier costs and it would have to be passed on from the energy supplier to the customer in reduced bills.

4. APSE Comment

APSE welcomed the ECO and Green Deal initiatives when they were originally announced as a significant move to improve energy efficiency, address carbon targets, reduce fuel poverty and produce cleaner more sustainable energy for the future.

However, APSE members and other public service providers who are landlords and have been working to improve the energy efficiency of their housing stock and other buildings through major retrofit programmes utilising the Energy Company Obligation (ECO) and Green Deal are already being negatively impacted by these developments.

The changes to ECO proposed have had a regressive impact upon the funding available for public sector housing retrofit programmes. A number of APSE members that have concluded ECO deals have now found that they are unable to implement a programme of planned improvements including external wall insulation and the regeneration of tower blocks and other flatted properties. This will have an adverse effect on many hard pressed communities and individuals in fuel poverty for whom home insulation could have significantly reduced the rising costs of heating their homes.

There will be a knock on effect to local jobs, training and for SME's who would have benefitted greatly from the large scale retrofit programmes. We have evidence that companies which had geared up for a role in ECO and Green Deal have had to lay off large proportions of their staff. The feeling is that a high quality energy efficient industry will not develop when investment expectations are set high but the funding is slashed and see no future in the industry.

It is also our understanding that currently the Energy Companies are either not considering any new funding requests for ECO or have massively scaled back such funding and are reviewing their future commitments. APSE believes that improving insulation and energy efficiency of homes is a vital prerequisite of ensuring a more balanced and affordable energy market in the longer term and reducing CO2 emissions in order to meet national and international commitments on carbon reduction.

One of the key reasons for the introduction of ECO was to target funding at those properties which were hardest to treat. A large number of these system built dwellings are occupied by the most vulnerable who are paying proportionally much more for heating and hot water. The recent reduction in the targets for solid wall insulation means that these residents, who have also made considerable contributions to the 'green levies' through their energy bills, will miss out on vital energy improvements to their homes at a time when energy prices are increasing significantly year on year.

The minimum target of 100,000 solid wall insulations is not helpful. There is already a carryover of 50,000 completed or in-hand jobs from 2013/14 which leaves under 50,000 for the next three years. Most average sized cities will have between 5,000 and 10,000 solid wall properties which could be treated if the funds were available. This puts the figure of 50,000 in context.

In terms of evaluating the impact of the changes on individual local authorities there will be knock on effects for the size of some of the scheme as initially developed. The reduction in CERO by 33% will mean a large reduction in resource available to ECO for local government and households over the coming 3 – 5 years. This means there will necessarily be a requirement on local authorities to re-assess the financial implications on existing and potential schemes and how this will influence the wider role local authorities have in delivering energy efficiency, reducing fuel poverty and cutting carbon in their areas.

The 'green levies' element of energy costs is of course an easy target. By focussing on this cost the energy companies can deflect attention from other costs they may be unwilling to reduce and the debate about profits. This is a short term approach with the reduction in investments unlikely to be made by the property owners and so lost at a time when there is general recognition that this type of action is fundamental to an effective energy management policy. Many hard pressed communities and households in fuel poverty will be adversely impacted by the changes and APSE will continue to press the Government to review its changes on behalf of member authorities.

There is anecdotal evidence that the market for ECO installations has reduced significantly. Specific examples include work at a northern council covering SWI for private properties which has dried up whilst free boiler replacements under HHCRO where funding seems to have evaporated and the inability to find contractors to apply for a contract to insulate 3,000 council solid wall homes. A further council were set to take advantage of the funding through a partnership with another council, having put in time to evaluating the opportunity, managing internal expectations, etc. A lot of time has been wasted in this case, all energy efficient measures in social housing are likely to be on hold until there is certainty and internal support has been lost as it appears they have been following a path which is unlikely to deliver as promised. Another northern council has seen a private sector housing ECO efficiency scheme greatly impacted. They are concerned that customer contributions will not be forthcoming and so make the scheme unviable especially as many of the properties they had hoped to target were in the most deprived areas where incomes are relatively low.

There is also the matter of reputation to be considered. As noted above, putting schemes in place and lining up all the combined elements such as interest and trust from the public, negotiations with provider companies, getting agreement from councillors, drawing up a plan and the financial contributions and outcomes is a long term exercise and can take over 12 months. As the nature of energy reduction and management investment is relatively new there is a definite reticence amongst the public about getting involved in it. The public tend to be risk averse in general and this type of work is something that they can see risks in. This adds to the problems of getting schemes up and running. When changes are made which result in cuts in funding and viability of schemes, the consequent damage to the reputation of ECO and the Green Deal are often irreparable.

APSE sees this as an opportunity missed. The vast majority of the existing housing stock will be in place in 50 or 60 years' time, some for much longer. Many families in each property will benefit over time as investment in the housing stock

APSE has written to Ed Davey, Minister for Energy and Climate Change on behalf of its members highlighting the negative impact of the proposed changes to ECO for many local authorities and housing associations. A response was received from Greg Barker, MP, Minister for Climate Change which is attached to this briefing.

Phil Brennan
Principal Advisor

Appendix 1. Consultation question responses

Question 1 - Do you agree that the 2015 CERO target should be reduced by 33 per cent from 20.9mtCO₂ to 14mtCO₂?

APSE does not agree with this target reduction. We feel that there are knock on effects of this reduction which will impact on social landlords, tenants, residents, job prospects, youth employment and small businesses.

Many of the properties (and tenants) which would benefit most from solid wall insulation are situated in local authority and HA owned estates. Investing in these properties is a long term objective which will ensure the properties are viable for many years to come as many are system built and most susceptible to suffer heat loss and associated issues. There is a clear need to keep the existing housing stock fit for purpose as demand for properties outstrips demand.

The loss of funding will also impact on other capital improvement works for the local authority housing stock if budgets have to be used to fill the funding gap. It is likely to have an impact on Green Deal funding which will impact upon the supply chain and local SMEs. The ECO funding on a sufficient scale would have allowed the build-up of delivery supply chains and capacity and act to drive down the price of such measures in the longer term.

ECO has filled a gap which was left out of the Decent Homes work to address energy management issues. Local authorities are unable to borrow to meet these objectives as there is no headroom to borrow against.

Many homes affected are occupied by vulnerable people who are paying proportionally more for heating and hot water. They will suffer from the problems of homes which may be under heated such as damp and mould issues. Home insulation could have significantly reduced the rising costs of heating their homes. The reduction in the target for solid wall insulation means that these tenants and residents will miss out on vital

energy improvements to their homes at a time when energy prices are increasing significantly.

The reduction in targets will mean that schemes already planned and signed off may not take place because they are financially unviable now that the changes have been brought in.

APSE also feels that improving insulation and energy efficiency of homes is a prompt for a more balanced and affordable energy market in the longer term and a reduction in CO2 emissions. We believe more efficient energy consumption could also aid Britain's long-term fuel security by reducing the need for imported fossil fuels, helping with the nation's balance of payments.

APSE is aware of a number of schemes which will no longer go ahead with an obvious impact on local jobs and supply chains.

Question 2 - Should the new 2015 CERO target be applied to Phases 1, 2 and 3, or to Phase 3 only? Please provide justification for your answer.

There is a need for certainty in the market especially for SMEs as such targets should be set out in a way which is most beneficial to sustain this market. The CERO target proposed is not adequate for all the properties that could benefit from the works. The target of 100,000 measures is simply too small as it stands even without the fact that 50,000 are estimated to have been completed already.

Question 3 - Do you agree that underachievement against the CERO target at 31 March 2015 should be able to be carried forward at a penalty rate of 1.1 times the amount of the shortfall?

We feel that the proposed uplift in targets does not provide an effective incentive for the utilities to achieve their CERO obligation within the next ECO period. Whilst some have significantly over delivered on the first phase, a number have significantly underachieved. In order to provide parity the target uplift needs to fairly reflect this underachievement and provide an assurance that the obligation funding is maximised over the whole ECO period (2013 – 2017).

The earlier schemes have seen an increase in costs at the end of the obligation period so to avoid a similar scenario thought needs to be given to ensuring methods of smoothing out the supply and delivery of work.

Question 4 - Do you agree that CSCO and Affordable Warmth targets should remain unchanged for 2015?

Yes we agree that the CSCO and Affordable Warmth targets should remain unchanged.

Question 5 - Do you agree that all excess activity under CERO, CSCO and Affordable Warmth should be compliant with rules put in place for these sub obligations from 1 April 2015?

Yes we agree that excess activity under CERO, CSCO and Affordable Warmth should be compliant with rules put in place for sub obligations from 1 April 2015.

Question 6 - Do you have a view on whether, and what proportion, of over-delivery against 2015 CERO, CSCO and Affordable Warmth targets should be permitted to count towards 2017 targets?

We would agree that a proportion of over-delivery work which complies with the new rules should be permitted to count towards 2017 targets.

Question 8 - Do you have views on whether the rules relating to transfer of activity can be improved or simplified?

The rules for transfer of activity should be as clear and easy to understand or implement as possible – this goes for all elements of what is a complicated schemes.

Question 9 - Do you agree that the ECO scheme should be extended from March 31 2015 to March 31 2017?

We would agree that extending the current obligation period to 31 March 2017 improves certainty and enables longer term planning which is most helpful for bigger projects, area based schemes and district energy. The extension to the scheme also enables utilities to work closely with local authorities to ensure the most appropriate properties have work carried out.

Question 11 - Do you agree that the 2017 CERO target should be set at 12.4MtCO₂?

This target is too low and it won't act as a sufficient prompt for the market to develop nor the properties that need to work to receive it.

Question 12 - Do you agree that the 2017 CSCO target should be set at 6MtCO₂?

Although there are problems with minimum targets this is appropriate if one is being set for 2017.

Question 13 - Do you agree that the 2017 Affordable Warmth target should be set at £3.8 billion of lifetime notional bill savings?

Same as for 12 above.

Question 14 - Do you agree therefore that work carried out to fulfil obligations under ECO should be additional to work funded under the incentive package? If yes, do you have suggestions on how this additionality could be ensured?

We agree.

Question 15 - Do you agree that all forms of cavity wall insulation, including standard "easy to treat" cavities installed from April, should be eligible as a primary measure under CERO?

We do not support this suggestion as we feel it will lead to fewer hard to treat properties being addressed. A large proportion of 'easy to treat' properties have been treated already and the focus should be on harder to treat properties.

Question 16 - Do you agree that loft insulation which is installed from April 2014 should be eligible as a primary measure under CERO?

No see above.

Question 17 - Do you think it would be appropriate to make provision to ensure that low income and vulnerable households benefit from the delivery of loft and easy to treat cavity wall insulation under the 2017 CERO target? Please provide views on any appropriate mechanism by which to do this.

Targeting these groups should be a priority. There is still the problem that a lot of properties are hard to treat and that some people do not want to engage. However the need to invest in the property remains whether the occupants are on low incomes, vulnerable or not. It is vital to ensure the stock is in good condition.

Question 18 - Do you agree that heat networks (district heating schemes) should also become eligible primary measures under CERO from 1 April 2014?

Yes we agree that heat networks should also become eligible primary measures under CERO from 1 April 2014. By linking the insulation of hard to treat properties to the qualification for district heating some schemes will be cancelled due to loss of ECO support. Some form of support for district heating is necessary if schemes which can add greatly to local heat generation are to go ahead.

Question 19 - Do you agree with the proposal to extend the number of eligible areas under CSCO from the lowest 15 per cent of areas, as identified using the Index of Multiple Deprivation, to the lowest 25 per cent of areas for measures delivered from 1 April 2014?

Yes we support the extension of CSCO areas.

Question 20 - Do you agree with the proposal to change the criteria for measures installed under the CSCO rural sub target so that, measures delivered from 1 April 2014 can count towards the sub target if

they are installed at any domestic property located in the poorest 25 per cent of rural areas, as well as to households living in rural areas that are in the Affordable Warmth Group.

APSE supports the extension of criteria to the poorest 25% of rural areas.

Question 23 - Do you agree that broken or not functioning efficiently electric storage heaters should be scored on the same basis as that used for “qualifying boilers”? Do you foresee any unintended consequences of this approach?

We believe the most effective appliances should be supported. However it is more important to consider all elements of the property than individual constituents.

Question 26 - Do you agree that there should be a SWI minimum figure equivalent to 100,000 properties insulated with SWI by 31 March 2017? Should this be set as number of properties, or as a carbon equivalent? If the former do you have any views on how this should be set? If the latter, do you have suggestions as to how the target should be calculated?

This figure is too small. Although it is a minimum it is highly likely that if the utilities have to make an argument for reducing investment in SWI they will simply quote the 100,000 figure. It would be better to set a far higher minimum target. There is already a carryover of 50,000 completed or in hand jobs from 2013/14 which leaves under 50,000 for the next three years. Most average sized cities will have between 5,000 and 10,000 solid wall properties which could be treated if the funds were available. This puts the figure of 50,000 in context.

Question 28 - Do you have a view on whether lifetime for other measures should also be set in legislation, and if, which measures?

We believe that setting a minimum lifetime guarantee will be an opportunity to ensure the market is able to provide a quality product fit for purpose, there may therefore be issues with the cost but the ability to upscale the delivery of such measures will drive down the cost whilst safeguarding the quality. Minimum lifetimes could be set in legislation.

Question 33 - Please provide views on whether, and if so, the extent to which Affordable Warmth measures should be part funded by customer contributions and other types of finance.

It is very unlikely that customer contributions will be a successful approach as the target groups lack the means to make such contributions and people will make alternative decisions based on their income.

Question 34 - Do you believe there is a case to limit customer contributions under Affordable Warmth?

There is a case for limiting contributions to a level where the contribution is very small - an approach which results in significant level of contributions will mean they will not be forthcoming.

Question 35 - Do you agree with the above “levelisation” proposals for recognising and rewarding early progress, and do they sufficiently address any adverse competitive implications of the other proposed changes to CERO?

Yes we would agree with proposals which seek to incentivise performance and early progress.

Question 41 - Do you agree we should change the rules, as set out above, to: align notification arrangements; introduce greater clarity and; extend the final date for transfers

We agree with these proposals.

Question 44 - Do you agree that boiler replacements should require a warranty to cover parts and labour, which should not be invalidated by incorrect installation/commissioning, and that it should provide for the actual repair/replacement rather than compensation?

Consumers should be protected in this market as they would normally be and adequate checks and balances should be in place. This means having sufficient resources in place to put quality checks and customer satisfaction checks in place with relevant sanctions in place.

Question 45 - Do you have views on what minimum period such a warranty should cover?

We would agree with this proposal and warranties should be set against good practice in the industry.

Question 48 - Do you believe that additional safeguards are required to ensure the quality of installations under Affordable Warmth, and if so, in what form?

We are aware from anecdotal evidence of poor quality received from a number of our member councils and believe that safeguards should be consistent with those currently in existence in the market. One of the criteria for choosing providers should be their internal quality procedures. For example there should be sanctions in place to ensure boilers are not installed when there is the chance that they become obsolete soon afterwards.

Question 49 - Do you believe the current means of checking the requirements of eligibility for a "qualifying boiler" are appropriate? Do you have any suggestions on how this could be improved?

See 48 above.

Question 50 - Do you think any changes to the definition or guidance on what constitutes a "qualifying boiler", for both repair and replacement, are necessary? If so, what changes would be suitable?

See 48 above.

Question 57 - Please provide views on the current administrative cost of checking Affordable Warmth Group eligibility and any other actions taken to meet Affordable Warmth Group audit requirements.

We support the use of a demand aggregation service.

Question 61 - Do you have views on the accounting treatment of the obligation?

We would support the mandating of a proportion of the ECO funding through the brokerage mechanism. We believe that local authorities are in a good position to design strategic schemes to meet identified need in their areas and support local supply chains for delivery seeking appropriate utility funding through an effective brokerage system. Certainty over funding over the life of a project is key to successful delivery.

Question 62 - Government invites views on what elements of the ECO scheme rules would benefit from simplification, and if so, how this can most effectively be done while still ensuring that the scheme objectives are met and the schemes integrity maintained?

ECO is a complicated scheme for all involved. It should be as clear and simple as possible. Added complexity only ends up using resources which should otherwise be used to save energy.

Question 63 - Government invites views on whether there are improvements that could be made to the ECO scheme on a longer term basis to ensure the scheme can best meet its objectives. We welcome evidence justifying the case for change.

The issue of hard to treat properties is a significant one. Addressing them should be seen as an investment in a property which is likely to be in use for many years to come and so a worthwhile investment funded through ECO. Providing a minimum target for work of, for example, 100,000 properties will act as a barrier to works rather than a prompt.

There is anecdotal evidence that DECC are not getting adequate costing information back from the utilities about the cost of comparable works. This should be an area of focus to ensure accountability and value for money from the existing funding.

Appendix 2. Response from Greg Barker, Minister for Climate Change to APSE letter on the future of ECO



Department
of Energy &
Climate Change

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Our ref: PO2014/01562/JH

○) April 2014

Dear Cllr Unczur,

Thank you for your letter dated 22 January to Edward Davey, about the future of the Energy Company Obligation (ECO) after the Autumn Statement. I am replying as this matter falls within my portfolio and I apologise for the delay in doing so.

I would like to reassure you that we took the views of a wide range of interested parties, into account when deciding the Autumn Statement. I recognise that many people had been concerned about this. But I believe it was right to examine the issue. The vast majority of customers pay for ECO as part of their energy bills. With bills rising it was right to review the impact these policies have on household energy costs and to ensure that the benefit of ECO is directed where it can make most impact.

I believe we secured a good outcome as part of the Autumn Statement. The proposed changes to ECO, subject to public consultation, will reduce the cost of the scheme and will result in £30-£35 savings on household bills, on average, in 2014. These proposals are part of a wider package of changes to green levies designed to reduce the cost of household bills on average by £50 a year.

I understand your concern around the impact of these changes. But I would stress that we are committed to helping households in fuel poverty. Crucially, these changes will not lead to any reduction in the level of support directed towards vulnerable households.

Affordable Warmth and the Carbon Savings Community Obligation targets, set for 2015, are proposed to remain at current levels. These are the dedicated fuel poverty parts of ECO, reaching some 230,000 households per year. Indeed, we propose to go further: we intend to set new targets for 2017, ensuring the current annual scale of activity and ambition continues into the future. This also gives longer-term certainty to important companies such as your own.

In addition to the changes of green levies, there is a separate three year package of measures worth £540 million. This is designed to boost energy efficiency even further by introducing new schemes for home-movers, landlords and public sector buildings.

In response to stakeholder representations, the Government proposes the following changes subject to consultation:

- Reduction of the carbon market to March 2015 by 33%, and a new target set from 2015 to 2017 at similar levels;
- Energy companies to count the installation of easy-to-treat cavity walls and lofts towards their ECO carbon saving obligation targets;
- Energy companies to provide a minimum number of homes with high-carbon saving solid wall insulation to give certainty to the solid wall industry, allowing it to invest for the future;
- Carbon Saving Obligation to include district heating schemes as a primary measure, helping whole communities to benefit from lower heating costs.
- Energy companies to 'bank' over-delivery against previous schemes against their ECO targets;
- A new mechanism to reward energy companies that have moved early to deliver their existing ECO targets;
- More low income areas eligible for measures under the Carbon Saving Communities Obligation (the poorest 25% rather than the poorest 15%).

I hope that you are already aware that the consultation on the Government proposed changes to ECO was launched on 5 March. I would welcome participation in the consultation and invite you to submit comments. The consultation document and further information can be found on the DECC website.

<https://www.gov.uk/government/consultations/the-future-of-the-energy-company-obligation>

Yours sincerely,

A handwritten signature in black ink, appearing to read 'L-BZ', written in a cursive style.

GREGORY BARKER