

# Consultation Response

## Energy Company Obligation ECO+: 2023 – 2026

Department for Business, Energy, and Industrial Strategy.

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## About this consultation

The Energy Company Obligation (ECO) has delivered 3.5 million energy efficiency measures to 2.4 million households across Great Britain since 2013<sup>1</sup>. ECO+ has been proposed by the Department for Business, Energy, and Industrial Strategy (BEIS) as an additional component to ECO in response to the energy price crisis. This new scheme is designed to complement existing provision and deliver faster installation of energy efficiency measures to a wider pool of households. This will include those on lower incomes and the least energy efficient homes in higher Council Tax bands.

## Key points and recommendations

- Improved support for household energy efficiency could not have come at a better time for older consumers and we warmly welcome the introduction of ECO+.
- With more than 3 million lower income households living in the least energy efficient properties, BEIS should expand ECO+ and commit to investing £1bn annually.
- The Government must continue funding ECO+ directly rather than levying its costs onto consumer bills.
- We strongly agree with the inclusion of a low-income group and encourage BEIS to incentivise suppliers to go beyond the proposed 20% low-income minimum target.
- To support this, Age UK proposes a 10% low-income over-delivery uplift which would be triggered once a supplier hits its minimum low-income installation target.
- Receiving ECO+ must not prevent a household accessing ECO4 – accepting short-term crisis measures cannot come at the expense of long-term support.
- While supportive of ECO+ we strongly believe that the underlying ambition must be to ensure multi-measure whole house retrofits are delivered to vulnerable homes.
- We encourage the Government to include Attendance Allowance, Personal Independence Payment, and Disability Living Allowance within the eligibility criteria.
- BEIS should drop proposals to remove England's ECO+ rural uplift and commit to deliver £1bn per year in additional Home Upgrade Grant (HUG) funding until 2032.
- We agree with a 10% carry under for the general group but there should be no carry under afforded to suppliers for the low-income group.
- BEIS should better incentivise suppliers to deliver more measures in the first year, especially in cases where they support vulnerable hard-to-reach households.
- We support LA and Supplier Flex providing 80% of the low-income target subject to several reforms, including the addition of social housing units to the flex criteria.
- Low-income EPC band E-G properties should be able to access ECO+ regardless of their ECO4 minimum requirement assessment outcome.

- Low-income group customer contributions should be banned, with funding for higher cost installations provided to ensure they can still access the full suite of measures.

## **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<sup>2</sup>. ECO+ has been proposed to complement existing energy efficiency provision and deliver faster installation of insulation measures to a wider pool of households. The Scheme has two eligibility groups – the low-income group and the general group. The low-income group broadly mirrors ECO4 eligibility (primarily those in receipt of means tested benefits or identified as vulnerable) while general group supports those who are in the lowest Council Tax bands but who also have an Environmental Performance Certificate (EPC) of band D or below. ECO+ is designed to provide suppliers the opportunity to deliver large scale, affordable insulation measures, at high volume. This addresses ongoing early implementation issues with ECO4, improves supply chain sustainability, helps achieve the objectives of net zero, and will insulate a greater number of vulnerable households against the cold more rapidly than would be achieved under ECO4. We warmly welcome the addition of ECO+ and will work with BEIS, Ofgem, suppliers, and local authorities to support delivery and ensure maximum access for vulnerable older households.

Age UK has reinforced the need for improved household energy efficiency funding throughout the energy price crisis. We support the Government's commitment to increasing ECO's allocated spend via the new ECO+ scheme. We are also pleased the Government has ringfenced additional energy efficiency spending from 2025 through the Energy Efficiency Taskforce (EETF) and committed to review consumer protection post April 2024 with the possible introduction of a social tariff. We look forward to engaging with

this longer-term programme of work alongside the Review of Electricity Market Arrangements (REMA)<sup>3</sup>.

Improved support for household energy efficiency could not have come at a better time for older consumers. Our estimates show that October's 27% rise in the typical energy bill has led to around three-in-ten (29%) older households in England being fuel stressed<sup>4</sup>, up from around one in ten (10%) only last year<sup>5</sup>. More than two thirds (67%) of people aged 60+ in Britain are worried about being able to heat their home when they want to, and more than half (54%) are worried about the impact of energy prices on their health<sup>6</sup>.

While the Energy Price Guarantee (EPG) and Energy Bills Support Scheme (EBSS) are much needed short-term measures, the Government's renewed commitment to household energy efficiency is a welcome longer-term solution to spiralling bills which enjoys broad support from the older population. Our research shows 76% of people aged 60+ in Britain want the Government to provide additional funding to households on lower incomes so they can gain access to household energy efficiency improvements<sup>7</sup>.

This support is very much warranted as there is no doubt that people in the least energy efficient homes will pay a premium to keep warm this winter. Age UK analysis shows that in the aftermath of October's price increase<sup>8</sup> the median annual household energy bill for homes in EPC bands A – C is around £2,100 compared with £2,600 for band D and £3,300 for band E<sup>9</sup>. For bands F – G the bill rises further still to a truly staggering £4,700<sup>10</sup>. This energy inefficiency premium has a devastating impact on older people – while one in six older households in the highest energy efficiency bands (A – C) are estimated to be experiencing fuel stress<sup>11</sup>, for F – G properties the figure increases to almost 9 in 10<sup>12</sup>. Insulating these homes against spiralling bills should be a top priority and we welcome ECO+ as crucial to meeting the Government's 2030 targets of reducing building and industry energy consumption by 15%<sup>13</sup> and bringing as many fuel poor homes as possible up to EPC band C or above<sup>14</sup>.

ECO+ will also fill a crucial gap in existing provision. While we strongly support ECO4<sup>15</sup> worrying initial reports from installer representatives suggest there have been implementation issues, with it proving difficult in some cases for installers to identify eligible households who meet the full criteria for a successful project completion score. ECO+ should help improve delivery as it will provide the opportunity for installers to deliver large scale, affordable insulation measures, at higher volume because they will generally only have to install single measures. This will include crucial measures for keeping out the cold such as loft, cavity wall, or under floor insulation.

Nevertheless, while this is a welcome addition, we strongly believe that the underlying ambition must be to ensure multi-measure whole house retrofits are delivered for vulnerable households. This will comprehensively lift them out of lower EPC bands, significantly reducing their bills in the process. Fruitful delivery of ECO4 will be crucial to this and part of its success will be ensuring the balance is struck between durable, high

quality energy efficiency measures which comprehensively mitigate the effects of the cold, while at the same time making sure installation, certification, and reimbursement for ECO4 projects is attainable for installers.

We believe ECO+ will help to ensure this balance is struck in homes that do not meet the ECO4 full project score threshold but are still in desperate need of support. To ensure installations are of a high quality and targeted at those most in need a full project score is only awarded for ECO4 in cases where: a household meets relevant eligibility criteria, the installers and the measures comply with Trustmark and PAS 2035 standards, and the installation successfully lifts the property up a qualifying number of Standard Assessment Procedure (SAP) points or EPC bands. This full project score is necessary for installers to be adequately reimbursed for their work and we have heard troubling reports from industry representatives that this full score is proving allusive even in cases where vulnerable households have been identified who would otherwise greatly benefit from energy efficiency improvements. It is important BEIS also considers how to work with installers to improve delivery of ECO4 over the coming years while still maintaining high installation standards and accurate targeting of those in greatest need.

While we welcome ECO+, the allocated spend is insufficient and the potential return of the consumer-cross subsidy will put more cost onto consumer bills, at a time when many people are already under severe financial strain. The Government must continue funding ECO+ directly once its subsidisation of energy bills via the EPG ends, rather than levying its costs onto consumer bills. The allocated spend (£1bn spread over three scheme years) also falls far short of what is needed. A scheme of 5+ years funded with £1bn per annum would better reflect industry preferences<sup>16</sup>, fill surplus supply chain capacity<sup>17</sup>, and provide measures for 1.23 million homes instead of the expected 410,000 as proposed<sup>18</sup>. With more than 3 million lower income households living in the least energy efficient properties in England alone<sup>19</sup>, this additional funding would better reflect the scale of need.

Age UK is also disappointed at the lack of additional support for homes living off the gas grid, as well as BEIS's proposal to remove ECO+'s incentive for installers to support homes in rural areas (the rural uplift) within England. 1.5 million households in England lack a gas network connection and rely on alternative heating fuels such as oil, bottled gas, and coal<sup>20</sup> – enduring a higher and deeper level of fuel poverty than those with a gas connection<sup>21</sup>. Age UK research<sup>22</sup> shows that up to 530,000 of these homes meet the eligibility criteria for the Home Upgrade Grant (HUG) but our estimates also show that present funding falls far short – between 2022 and 2025 HUG would, at best, cover just 117,000 homes<sup>23</sup>. Age UK strongly recommends the Government increases HUG funding as part of its ECO+ ambitions. £1 billion of HUG grants per year through to 2032 would be sufficient to upgrade all eligible homes to EPC band C<sup>24</sup>. This would also meet and exceed the lingering £1.4 billion gap in HUG funding – calculated as the shortfall between present HUG commitments and the support agreed in the Government's 2019 manifesto<sup>25</sup>. An

important initial signal of the Government's commitment to off-grid homes must be for BEIS to commit to dropping its proposal to remove ECO+'s rural uplift in England.

We also propose a low-income over-delivery uplift. This would be triggered once a supplier hits its initial 20% minimum low-income target for ECO+. At this point they would receive an uplift of 10% for any additional installation supplied through the low-income criteria. We provide further details of this in response to question 18 and would be happy to work with BEIS to develop these plans.

Age UK's responses to the consultation questions below provides our specific views on how to ensure ECO+ rapidly supports vulnerable older households and avoids locking them out of the scheme. It highlights the need for enshrining fairness and accessibility as the golden threads running through BEIS's proposals. Beyond the below responses we also know from experience that the often-complex nature of the ECO scheme makes it very difficult to navigate for many of those entitled to support. BEIS should be mindful of this and work to provide clear guidance to consumers on how to apply and access ECO and ECO+ and how the schemes may interact. We would welcome the opportunity to engage with BEIS on this and wider implementation issues as ECO+ gets underway.

## **Consultation questions**

### **1. Do you agree with the proposal to set mandatory annual targets for ECO+?**

With the typical annual energy bill expected to drop by around a quarter from an expected high of £4,255 in January 2023 to £3,182 in October,<sup>26</sup> and ECO+ expected to reduce these by around £310,<sup>27</sup> rapid delivery will maximise the impact on bills. With scope to improve 410,000 homes<sup>28</sup> BEIS should ensure the target is focused on getting high quality measures installed quickly and, wherever possible, focusing on the most vulnerable first.

We are also concerned that with scheme years 2 and 3 having a target more than three times larger than that of scheme year 1, some suppliers may see the lower initial target as a ceiling rather than a minimum and avoid rolling out additional measures rapidly. We encourage BEIS to reward ambitious suppliers who exceed their scheme year 1 target and welcome proposals for a carryover of obligations into scheme years 2 and 3 (see response to question 6). This will ensure suppliers who successfully deliver measures more quickly in scheme year 1 are able to offset this against their subsequent obligations, incentivising them to rapidly deliver support.

### **3. Do you agree with our proposal to facilitate early delivery under ECO+ ahead of the ECO+ Order coming into force?**

Regulations to bring ECO+ into force are expected in the spring but this will leave a gap in provision over winter. We strongly agree that BEIS should work to incentivise early delivery amongst suppliers and expedite the process of getting relevant legislation passed.

We are concerned that many suppliers will be reluctant to adopt early delivery without the certainty of regulations being in place. The 'boom-bust' nature of many recent Government energy efficiency programmes has left the installer industry lacking the capacity and appetite for risk<sup>29</sup> that early delivery requires. The Government must provide concrete reassurances that if suppliers proceed with ECO+ prior to necessary legislative changes being enacted then installers will still be reimbursed for any works conducted even if the regulations are delayed or cancelled. This will be essential to restoring supply chain confidence after years of uncertainty around the status of energy efficiency schemes.

**5. Do you agree with our proposal to allow each supplier a maximum of 10% carry under of the Year 1 obligation to Year 2 for ECO+?**

BEIS has proposed that suppliers who fail to meet their year 1 target by up to 10% can roll this obligation over into scheme year 2. This is designed to minimise administrative backlogs towards the end of the first scheme year and is in recognition of the reduced flexibility and potential for increased supplier costs as a result of having a specific mandatory target.

As discussed in our response to question 1, speed of delivery in the first scheme year is key to the success of ECO+, alongside delivering high grade measures to a wider pool of vulnerable households. At the same time, we recognise that administrative issues have already hampered delivery of ECO4 and it is important that some flexibility is afforded to ensure effective delivery.

We agree that up to 10% carry under should be permitted for the general group but that there should be no carry under afforded to suppliers for the low-income group. This would better reflect the urgency of installing measures for this cohort in scheme year 1 and with this group representing just 20% of the target for suppliers<sup>30</sup> it should have minimal impact on the viability of annual supplier targets.

**6. Do you agree with our proposal to allow unlimited carry-over between annual targets for each of the first two years of ECO+?**

As discussed in response to question 1 Age UK is keen to see swift delivery of ECO+ measures in scheme year 1. We therefore strongly support BEIS's proposals for unlimited supplier obligation carry over. BEIS should work to reward and incentivise suppliers who deliver more measures in the first year, especially in cases where they support vulnerable hard to reach households.

**8. Search costs across the two eligibility groups: Do you agree with our plans to use lower search costs for the general eligibility group in the final ECO+ modelling compared to the low-income group? If so, by how much should we reduce search costs in the general group? Please provide BEIS with information on search costs supporting your response.**

Age UK understands that the costs of identifying eligible households may differ between the low-income and general groups. However, our concern is ensuring that differential search costs do not disincentivise suppliers taking on the additional costs and resource constraints of searching for households who are eligible through the low-income route beyond the initial minimum target of 20%. At the same time, we do not want the low-income search costs to be set so high that they significantly hamper the quantity of homes benefitting from the scheme.

If allocating differential search costs within ECO+ modelling will make supporting low-income households more cost competitive with general group while ensuring adequate provision, then we support these plans. It as yet remains unclear whether this will be the case, with the ultimate outcome likely determined by the final differential value BEIS settle on. We are unable to propose an exact figure but we would encourage BEIS to decide based on these two criteria – incentivising low-income delivery and maximising the number of low-income beneficiaries.

**14. Do you agree ECO+ should target two groups with the first focusing on a general group with wider eligibility requirements and the second focusing on low-income households in line with ECO4?**

We strongly agree with the inclusion of a low-income group within the ECO+ eligibility criteria. This will ensure support for those vulnerable households who remain unable to attain a full project score from ECO4 and may therefore face exclusion. We would encourage BEIS to incentivise suppliers to go beyond the proposed 20% low-income target and, where possible, deliver a higher proportion of measures to this group. With BEIS arguing that it will be more expensive to identify eligible households in the low-income group<sup>31</sup> (see response to question 8) it is essential there are appropriate incentives for suppliers to prioritise the most vulnerable in excess of this initial 20% target. We propose some solutions in response to questions 8 and 18.

While we have reservations, we accept the inclusion of a general group will help complement existing ECO4 provision and improve the energy efficiency supply chain. The general group adds value by including a wider eligibility pool, particularly given that parallel schemes (e.g. ECO4) continue to be directed towards those in greatest need. Given the goals of ECO+ wider eligibility criteria are useful in ensuring rapid identification and delivery of measures. The focus on properties in lower Council Tax bands is an imperfect method of targeting but will nonetheless help direct more resources towards households in greater need, especially when combined with the secondary criteria of properties being in



EPC bands D – G. We raise some of our specific concerns with Council Tax band targeting in response to question 15.

**15. Do you agree with our proposal to target “general group” support at households in Council Tax bands A-D in England, A-E in Scotland and A-C in Wales with an EPC of D and below?**

We accept this approach as an imperfect proxy for rapidly delivering support to people in higher need, but we are particularly concerned that the amount of money allocated remains inadequate. There are 4.3 million households in England not eligible for general group because they live in Council Tax bands E to H, among whom almost half (2.1m) include at least one-person aged 60+<sup>32</sup>. Among those older households who won't be eligible, one-in-five (21 per cent) are living in poverty or just above the poverty line and/or are in receipt of income-related benefits<sup>33</sup>. This represents around 440,000 older households who are vulnerable to the impact of spiralling energy bills.

While the low-income component of ECO+ will help support this group there is simply not enough allocated low-income spend to cover these 440,000 older households, or those of all ages in a similar position. With more than 3 million lower income households living in the least energy efficient properties in England alone<sup>34</sup> an additional £1 billion per annum for ECO+ would better reflect the scale of need (see our introduction for further details).

**16. Do you agree with our proposal to target all eligible low-income households living in EPC band D-G through the low-income group?**

We agree with this approach.

**17. Do you agree with our proposal to carry over the same eligible benefits from ECO4 to the low-income group under ECO+?**

Eligible benefits under ECO4 include Pension Credit, Housing Benefit, and Universal Credit<sup>35</sup>. Many of the most vulnerable older households miss out on ECO4 because they are not eligible for these benefits. Furthermore, 770,000 older people who are eligible for Pension Credit still miss out on their entitlement<sup>36</sup>, making access to schemes like ECO4 more difficult. It is therefore imperative that ECO+ includes a more flexible component to its eligibility criteria. Encouraging suppliers to proactively identify households missing out on their benefits but still struggling via their general group spend will provide much needed reassurance. ECO4 also includes a flexible component through its LA and Supplier Flex wing. This allows for proactive identification of those lacking the standard eligibility criteria. BEIS is keen to mirror this flexible eligibility component with ECO+ and we welcome this commitment, subject to certain caveats (see response to question 19), and encourage

BEIS to work with local authorities and suppliers to target people missing out on welfare benefits.

We also encourage BEIS to consider adding disability benefits to the list of eligible benefits and correspondingly increasing funding to meet any additional demand. Older people with disabilities or long-term health conditions often face higher energy bills because of the costs associated with operating at-home medical equipment such as dialysis and oxygen concentrators. We encourage the Government to include Attendance Allowance, Personal Independence Payment, and Disability Living Allowance within the eligibility criteria for ECO+.

**18. Do you agree with our proposal to set a low-income group minimum requirement equivalent to 20% of each annual target with flexibility on whether the remaining obligation is delivered to low-income or general group households?**

We encourage BEIS to incentivise suppliers to go beyond the proposed 20% low-income target and, where possible, deliver a higher proportion of measures to this group. At minimum, BEIS should remove the carry under afforded to suppliers for the low-income group to ensure they are mandated to meet their target in each scheme year (see response to question 5) and ensure search costs (see response to question 8) and relevant uplifts incentivise low-income delivery.

In this vein, Age UK strongly recommends the adoption of a low-income over-delivery uplift. This would be triggered once a supplier hits its initial 20% minimum low-income target. At this point they would receive an uplift of 10% for any additional installation supplied through the low-income criteria. While we recognise the utility of adding general group eligibility, this new uplift would better incentivise distribution to vulnerable households beyond the minimum target while having marginal impact on general delivery numbers. This uplift should also sit alongside existing low-income incentives (e.g. higher search costs and the exclusive ECO4 Flex Route 4 uplift).

**19. Do you agree that we should allow up to 80% of a supplier's low-income minimum requirement to be met through LA and Supplier Flex, with unlimited flex permitted beyond the low-income minimum requirement?**

LA and Supplier Flex forms a key component of the ECO4 scheme. It allows suppliers and local authorities to proactively identify private tenure households which they deem fuel poor or vulnerable to the cold<sup>37</sup>. It was designed to help identify households unable to access their benefits entitlement by using bespoke identifiers such as local health information or data on access to Council Tax reductions<sup>38</sup>. LA and Supplier Flex

contributions are capped at 50% of a supplier's total obligation under ECO4<sup>39</sup>. BEIS are proposing a higher flex cap for ECO+.

Within ECO+ the low-income group will represent a minimum 20% of a supplier's target, with the general group making up the remainder. BEIS's proposal is to allow the LA and Supplier Flex referral route to account for up to 80% of this low-income minimum and an unlimited amount of the general group spend.

In principle, LA and Supplier Flex represents a bespoke, proactive way of identifying people who are more vulnerable to the cold or who are missing out on their benefit entitlement. In this respect, BEIS's proposal should align well with ECO+'s stated goal of providing rapid delivery of measures to a broader pool of households, while better accounting for the 770,000 older people missing out on their Pension Credit entitlement<sup>40</sup>.

However, ECO4 is still in the early stages of delivery, making it hard to assess the progress of its LA and Supplier Flex component. Some local authorities have already reported that they have struggled to take advantage due to capacity constraints<sup>41</sup>. Evaluation of previous ECO iterations exposed issues with LA and Supplier Flex targeting, with one report finding that 12% of supported households had an income over £40,000 and 2% over £75,000<sup>42</sup>.

This is certainly less of a concern than with previous iterations of ECO given that the cost of living is increasingly straining the budgets of middle and even higher income older households<sup>43</sup>. BEIS also considers that supplier referrals will increase due to the energy price crisis<sup>44</sup>. Affording providers additional wiggle room may therefore prove crucial to ensuring a more effective roll out, as suppliers are permitted to maximise their role in proactively identifying and supporting their vulnerable customers.

On balance, we support BEIS's proposal to allow unlimited flex beyond the low-income minimum requirement and to permit 80% of the low-income minimum to be delivered via LA and Supplier Flex. However, we wish to caveat this acceptance as it is subject to BEIS making three crucial amendments. Firstly, LA and Supplier Flex should be broadened to include social housing units missing out on alternative support. Secondly, BEIS and Ofgem must ensure they adequately monitor the roll out of flex measures, providing oversight of local authority and supplier efforts to proactively identify those in greatest need. Finally, BEIS should revise the 80% low-income minimum target after scheme year 1 if delivery data suggests suppliers and local authorities are failing to adequately identify and support vulnerable households.

**21. Do you agree with our proposal that only PRS households in EPC bands D and E should be eligible for ECO+ in the general and low-income group, while PRS**

**households in EPC bands F and G should be excluded, other than when exempt from the minimum energy efficiency standard?**

We disagree with this approach. While we appreciate that Minimum Energy Efficiency Standard (MEES) Regulations for the private rented sector (PRS) should mean landlords are taking responsibility for their tenants' insulation needs, the reality is that 190,000 private tenants continue to live in rental properties within the lowest energy efficiency bands (F – G)<sup>45</sup>. We are sceptical that under present economic conditions landlords will rapidly comply with the MEES over coming years. While our focus is on supporting older tenants in the PRS, BEIS must accept that without support for the lowest energy efficiency PRS properties many landlords simply won't cover the costs of improving the homes of their vulnerable older tenants.

This is particularly troubling given that PRS households have a higher fuel poverty rate (25.0%) than either social housing tenants (18.7%) or owner occupiers (8.4%)<sup>46</sup>. Almost half (49.4%) of PRS households in EPC bands F and G are fuel poor, representing 94,000 homes<sup>47</sup> – the vast majority of which would be excluded under these proposals for ECO+.

Spiralling interest rates are increasingly putting unsustainable pressure on landlords with more and more now unable to afford their mortgages – risking increased tenancy foreclosures. Interest rates are potentially going to hit 4.5% by 2023 and may go as high as 6% which will have a devastating knock on impact on mortgage defaults<sup>48</sup>. Landlord possession claims are rapidly increasing, with Q3 2022 seeing them approach pre-pandemic levels<sup>49</sup>. Compared with the same time last year possession claims have increased 106%, orders for possession 174%, warrants 87%, and repossessions 10% - although regulations in the Coronavirus Act 2020 may have impacted these figures<sup>50</sup>.

It is hard to ascertain the degree to which this is caused by landlords being unable to meet their mortgage costs and repossessing homes to sell them or find tenants willing to pay more. Nonetheless, with mortgage prices going up and landlords increasingly feeling the pinch themselves we are concerned that they will be unable or unwilling to rapidly make energy efficiency improvements to their properties without Government support.

As a result, now is not the time to cut off ECO+ support for PRS tenants. BEIS should reconsider its proposal and commit to include PRS properties with an EPC band F – G within the scope of ECO+ as it will ensure rapid delivery of measures in cases where landlords remain unable or unwilling to pay for improvements.

**24. Do you agree with our proposal that social housing will be included for EPC bands E-G in line with the eligibility criteria for general and low-income eligibility groups?**

While we accept the argument that social housing units receive support from the Social Housing Decarbonisation Fund (SHDF), we recommend at minimum that BEIS include eligible EPC band D social housing properties within the low-income group. This will ensure rapid delivery of measures for some of the most vulnerable people living in social housing and would complement rather than duplicate existing SHDF provision.

While lower than the PRS (25.0%), social housing units still have the second highest fuel poverty rate (18.7%) which is still significantly greater than owner occupied properties (8.4%)<sup>51</sup>. Older households are more likely to be owner occupiers, but older renters are more likely to be in the social housing sector. Age UK analysis<sup>52</sup> shows that there are around 1.8 million social housing homes in the UK with at least one-person aged 60+ in residence. Ensuring social housing tenants have access to rapid installation of energy efficiency measures is therefore essential to supporting older people, particularly those on the very lowest incomes. We strongly encourage BEIS to include eligible EPC band D social housing properties within the ECO+ low-income group.

**26. Do you agree social housing in the general and low-income eligibility group with EPC band D should only be eligible for the Innovation Measures that are eligible through ECO4?**

We disagree (see response to question 24).

**27. Do you agree that rural uplifts of 35% should apply in Scotland and Wales only?**

ECO4 incentivises suppliers to support rural homes off the gas grid in Scotland and Wales via a 35% rural uplift. BEIS is proposing to replicate this uplift and also remove the off-gas grid requirement. This would benefit older people living in rural areas of Scotland and Wales but leave those in England without equivalent support.

We disagree that the 35% rural uplift should only apply to Scotland and Wales. While England benefits from the Home Upgrade Grant (HUG) the scheme differs significantly from ECO+ meaning that the lack of a rural uplift will negatively impact rural delivery in England. 1.5 million households in England lack a gas network connection and rely on alternative heating fuels such as oil, bottled gas, and coal<sup>53</sup>. They endure a higher and deeper level of fuel poverty than those with a gas connection<sup>54</sup>.

Differences between ECO+ and the HUG scheme will leave older households using alternative fuels at great disadvantage if England is excluded from the rural uplift. HUG is predominantly focused on installing multiple measures through select local authorities that have been awarded support, while ECO+ is designed to ensure rapid delivery of single

measures across Britain. HUG is also a means-tested scheme while the majority of ECO+ funding will go to its general group.

Industry experts have highlighted that this uplift imbalance may result in some English households missing out<sup>55</sup>. We agree with this assessment and call on the Government to include the 35% rural uplift in England to better incentivise suppliers to target hard-to-reach rural households.

**32. Do you agree with our plans to explore additional access routes to the scheme, including through GOV.UK?**

We strongly agree with BEIS's proposal to provide multiple access routes to the ECO+ scheme including through GOV.UK. With older people facing increased rates of digital exclusion<sup>56</sup> it is essential that eligibility checkers and application routes are provided via online and offline formats. We therefore encourage BEIS to go further than just using this online resource and provide additional Government supported routes into the scheme. Facilitating applications and eligibility checks over the phone should be a priority alongside partnership working with well-placed community and voluntary organisations who have experience identifying and supporting households in greatest need.

**33. Do you have any views or ideas for how best this might be made to work to overcome noted obstacles?**

BEIS must ensure fairness and accessibility are the golden threads running through the ECO+ scheme. Proposed additional access routes are rightly focused on ensuring consumers can actively check their eligibility and put themselves forward for ECO+ support. This makes it absolutely essential that older consumers are fully accounted for in this process. Age UK would welcome the opportunity to work with BEIS on the customer journey and user experience to identify best practice for older people.

Our initial thoughts are that if the Government wants to maximise the chances of success it must promote the eligibility checker and any additional application routes through a broad range of sources, including print media, mail drops, and community and voluntary organisations. BEIS must also consider additional consumer communication requirements, for example where there is a language barrier or someone has a relevant disability or long-term health condition (e.g. a visual impairment).

Of greatest importance is accounting for the barriers certain consumer groups face to accessing the internet. Older people confront obstacles to engaging with Government support on a daily basis because of increased rates of digital exclusion<sup>57</sup>, with two fifths of those aged 75+ not using the internet<sup>58</sup>. For the additional application route to succeed

BEIS must make offline accessibility a mainstay of its user experience. We look forward to engaging on how best to achieve this to maximise the success and accessibility of ECO+.

**35. Are there additional issues you wish to flag about the interactions between ECO4 and ECO+ and/or with other grant schemes?**

Proposals for the scheme's rural uplift could create a perverse disincentive for installers in England to support rural homes when compared to Scotland and Wales. We wish to see BEIS maintain the 35% rural uplift for ECO+ (see our response to question 27).

**36. Do you agree with our proposal to target the low-income group at eligible households in EPC bands E, F and G that cannot meet the ECO4 minimum requirement?**

Efficiency is key to successful delivery of the ECO+ scheme for the most vulnerable older consumers urgently in need of support. While Age UK understands that interactions between ECO4 and ECO+'s low-income group mean including band E-G as standard may duplicate some aspects of ECO4, it is our view that the remit, goals, and design of ECO+ are distinct enough that this will be of minimum concern.

Given some of the complex delivery issues with ECO4 outlined at the outset of this consultation response, we are concerned that in many cases homes will technically reach the threshold for an ECO4 full project score, but installers will be reluctant to proceed for fear they will be unable to break even on the project. This could leave homes in bands E-G unable to access quicker ECO+ measures because of a technicality.

It is our view that it would be far more efficient for BEIS to allow low-income E-G properties to access ECO+ regardless of whether they fail to meet ECO4's minimum requirements. This will also simplify the scheme and make it far easier for referral bodies, self-assessment tools, installers, and suppliers to determine if a household will be eligible.

This recommendation is predicated on the principle that any home which receives ECO+ support will still be eligible for a subsequent ECO4 whole house retrofit or one run in parallel (see response to question 40). ECO4 retrofits should account for the inclusion of ECO+ measures, allowing the schemes to compliment each other while improving supply chain viability.

**40. Do you agree with our proposal to exclude E, F or G properties that have received support under ECO+ from receiving further support under ECO4?**

Age UK fundamentally disagrees with this proposal. Accepting short term ECO+ support during a crisis cannot come at the expense of longer-term eligibility for ECO4 without massively disadvantaging older consumers. BEIS's justification that this will reduce gaming risks is simply not sufficient to warrant this drastic decision.

ECO+ and ECO4 have completely different delivery targets, eligible measures, and entitlement criteria. Each scheme has a wholly different remit, with ECO+ primarily designed to install rapid measures – providing a swift reduction in bills. ECO4 is a far more comprehensive scheme designed to improve the core fabric of a home and systematically eliminate the impact of the cold over the longer-term.

BEIS has a long track record of allowing ECO to be complemented by wider schemes. The original proposal for ECO4 rightly made clear that the scheme could work in tandem with the HUG scheme to support the same property and would not be mutually exclusive, even if specific measures could not necessarily be cross-subsidised<sup>59</sup>. Even in cases where BEIS has prevented simultaneous delivery, sensible exceptions have always been made. For instance, during ECO3 BEIS allowed a simultaneous delivery exemption to facilitate concurrent installation of ground source heat pumps via the Domestic and Non-Domestic Renewable Heat Incentive (RHI) alongside ECO<sup>60</sup>.

This proposal also presents a crucial problem with using property-based entitlement. ECO4 and ECO+ will be running until 2026 but the above proposed exclusion criteria are based on the property itself instead of the circumstances of householders. This could result in vulnerable households being locked out of ECO4 at later stages because the previous occupier of their home benefited from ECO+. An illustrative example helps demonstrate this point: in 2023 a household successfully receives short-term support through general group of ECO+. Two years later an older person in receipt of Pension Credit moves into the property and is in need of a more fundamental household retrofit. They get in touch with their supplier to ask for ECO support and are told they are ineligible because the previous occupier claimed support through ECO+.

The simplest and fairest way of addressing this and wider concerns is for BEIS to allow EPC band E, F, and G properties who have benefited from ECO+ to still get support from ECO4 and ensure the measures installed under each scheme serve to complement one another rather than being treated as mutually exclusive. Age UK cannot underscore enough how important it is that BEIS avoid locking vulnerable older households out of ECO4 because ECO+ support had previously been provided.

**41. Do you have views or information on how the proposals set out in this consultation will impact people with protected characteristics under the Equality Act 2010?**



Throughout this consultation we have proposed ways BEIS can ensure they comply with their public sector equality duty under the Equality Act 2010 and better account for the needs of older people. BEIS will fail in its duty if it does not ensure consumer fairness and accessibility are the golden threads running through the ECO+ scheme. This must include accounting for the 770,000 older people not in receipt of their Pension Credit entitlement<sup>61</sup>, two fifths of those aged 75+ not using the internet<sup>62</sup>, and households who are disengaged from the energy market and more likely to be struggling financially<sup>63</sup>.

It is imperative BEIS acknowledges and works to address inequities for older people from ethnic minority backgrounds within ECO+ delivery. BEIS collect statistics on fuel poverty based on the household reference person (HRP). Households with an ethnic minority HRP have a higher rate of fuel poverty (19.1%) when compared with households with a White HRP (12.6%)<sup>64</sup>. In terms of broader poverty, 16% of pensioner households with a White HRP are in poverty, 33% of pensioner households with an Asian HRP, and 30% of pensioner households with a Black HRP<sup>65</sup>. Age UK research<sup>66</sup> shows that older people from ethnic minority backgrounds are more worried about the impact of energy prices on their health, being able to heat their home, affording their energy bill, and paying for wider essentials. BEIS must ensure ECO+ accounts for this and wider intersectional issues within the older population and society more broadly.

While it is important that older age is not automatically equated with vulnerability, Age UK is acutely aware that people in later life are more likely to have a disability. BEIS must therefore recognise this interaction between older age and disability in its equality impact assessment, particularly given that fuel poverty disproportionately impacts disabled people. The fuel poverty rate for disabled households is 47% higher than for households not containing a disabled resident<sup>67</sup> and over a third of disabled adults report that their impairment or condition has had an impact on their energy use<sup>68</sup>.

BEIS must fully account for the needs of older people in order to comply with its public sector equality duty, alongside comprehensively accounting for wider protected characteristics. Age UK would welcome the opportunity to work with BEIS to ensure this goal is achieved.

#### **44. Do you agree with our proposal to offer only single insulation measures to both eligibility groups?**

We encourage flexibility with two or more measures permitted where specific circumstances warrant it. BEIS provides an example where a home is comprised of both solid and cavity walls with the proposal being that such a property would only be eligible for a single measure. We do not see this as an example of best practice implementation but a missed opportunity.

This is particularly true as BEIS's present proposal is for homes to only be eligible for ECO+ if they are not eligible for multiple measures under ECO4, and ECO+ beneficiaries will then be locked out of ECO4. We recommend a degree of flexibility be afforded to local authorities, suppliers, and installers to offer multiple measures where one would be woefully inadequate at keeping out the cold. While we would encourage BEIS to consider this across the board, priority should be given to the low-income group receiving two or more measures where appropriate.

**46. Do you agree with our proposal to encourage customer contributions to allow the delivery of higher-cost insulation measures through the general eligibility group?**

While we accept that contributions from general group recipients towards the price of costlier measures may be appropriate, BEIS has proposed that both eligibility groups will be able to contribute. Although general group participants are anticipated to be far more likely to do so,<sup>69</sup> we are concerned that permitting contributions from the low-income group will put many vulnerable consumers in a difficult position. While a customer contributory model could help galvanise the energy efficiency roll out<sup>70</sup> for many older people it may also make them wary of engaging with ECO+, particularly in the context of an increased prevalence of cost-of-living scams.

National Energy Action (NEA) previously argued against a customer contributory model for ECO4 because installation measures were likely to prove unaffordable for those on the lowest incomes, risking an unfair and inaccessible scheme<sup>71</sup>. Age UK shares this concern for the low-income group of ECO+.

We accept that for general group consumer contributions may be necessary. We would therefore recommend that accepting customer contributions be banned for the low-income group only, but that funding for higher cost measures (e.g. solid wall insulation) still be provided to ensure they can access the full suite of support measures.

**64. Do you agree with our proposal to impose ECO+ guarantee requirements through TrustMark registration?**

To achieve the Government's 2030 targets of reducing building and industry energy consumption by 15%<sup>72</sup> and bringing as many fuel poor homes as practicable up to EPC band C or above<sup>73</sup> ECO+ must avoid taking one step forward and two steps back on energy efficiency. Ensuring high quality measures are installed is essential to this, otherwise the Government risks having to fund replacements before 2030.

Age UK's ECO4 response strongly reinforced the need for longevity of installation measures and corresponding guarantees<sup>74</sup>. We echo our previous comments and welcome BEIS's commitment to ensuring the measures installed into older people's homes under ECO+ are well built, durable, and fit for purpose. This fosters consumer confidence,

improves the quality of insulation measures, and ensures the legacy of ECO+ will be many years of keeping out the cold.

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<sup>1</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg8.

<sup>2</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22].

<sup>3</sup> Age UK, 2022. Consultation Response: Review of Electricity Market Arrangements. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/safe-at-home/consultation-response---review-of-electricity-market-arrangements-department-for-business-energy--industrial-strategy.pdf>. [Accessed 08/12/22].

<sup>4</sup> We define households experiencing fuel stress as households spending more than 10% of their after-tax income on energy costs, so as to maintain an adequate standard of warmth. This definition was used to calculate the fuel poverty statistics in England from 2001 to 2011, and continues to be the definition used in Wales, Scotland, and Northern Ireland to calculate their respective fuel poverty statistics.

<sup>5</sup> Age UK, 2022. Research briefing: Estimating the impact of the Energy Price Guarantee (October 2022) on older households in England. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-impact-of-the-energy-price-guarantee-epg-on-older-households-in-england-september-2022.pdf>. [Accessed 02/10/22].

<sup>6</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative.

<sup>7</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative.

<sup>8</sup> This refers to October 2022 and therefore accounts for the impact of the Energy Price Guarantee on consumer energy bills.

<sup>9</sup> Age UK analysis of Fuel Poverty Dataset 2019; Department for Business, Energy, and Industrial Strategy; Ofgem. This analysis accounts for the impact of the Energy Price Guarantee and the Warm Home Discount. The median value was used as extreme values were impacting the mean. Household sample sizes: A/B/C (5,684), D (5,058), E (906), F/G (326).

<sup>10</sup> Ibid.

<sup>11</sup> We define households experiencing fuel stress as households spending more than 10% of their after-tax income on energy costs, so as to maintain an adequate standard of warmth. This definition was used to calculate the fuel poverty statistics in England from 2001 to 2011, and continues to be the definition used in Wales, Scotland, and Northern Ireland to calculate their respective fuel poverty statistics.

<sup>12</sup> Age UK, 2022. Research briefing: Estimating the impact of the Energy Price Guarantee (October 2022) on older households in England. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-impact-of-the-energy-price-guarantee-epg-on-older-households-in-england-september-2022.pdf>. [Accessed 02/10/22]. Pgs9-10.

<sup>13</sup> HM Treasury, 2022. Autumn Statement. His Majesty's Treasury. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1118417/CCS1022065440-001\\_SECURE\\_HMT\\_Autumn\\_Statement\\_November\\_2022\\_Web\\_accessible\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118417/CCS1022065440-001_SECURE_HMT_Autumn_Statement_November_2022_Web_accessible_1_.pdf). [Accessed 01/12/22].

<sup>14</sup> Agility ECO, 2022. 2030 Fuel Poverty Target will overshoot by over 30 years. Agility ECO. [Online]. Available at: <https://www.agilityeco.co.uk/2030-fuel-poverty-target-will-overshoot-over-30->

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[years#:~:text=The%20Government%E2%80%99s%20statutory%202030%20fuel%20poverty%20target%20to,2065%20to%20achieve%20unless%20further%20funding%20is%20announced.](#) [Accessed 02/12/22].

<sup>15</sup> Age UK, 2021. Consultation Response Energy Company Obligation ECO4: 2022 – 2026. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/energy-company-obligation-eco4---maintaining-energy-efficiency-support-from-2022.pdf>. [Accessed 01/12/22].

<sup>16</sup> Gemserv, 2022. ECO Plus Supply Chain Market Research. Gemserv. [Online]. Available at: [https://gemserv.com/wp-content/uploads/2022/07/ECO-supply-chain-market-research\\_report\\_010722\\_final.pdf](https://gemserv.com/wp-content/uploads/2022/07/ECO-supply-chain-market-research_report_010722_final.pdf). [Accessed 02/12/22].

<sup>17</sup> EEIG, 2022. ECO Plus - A 'Great British Energy Saving Scheme. Energy Efficiency Infrastructure Group. <https://www.theeeig.co.uk/media/1132/eco-plus-principles-eeig-website-final.pdf>. [Accessed 02/12/22]. Pg2.

<sup>18</sup> Extrapolated from BEIS's own estimates for a £1bn spend. BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg8.

<sup>19</sup> Age UK analysis of the English Housing Survey; 2019/20.

<sup>20</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.

<sup>21</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.

<sup>22</sup> Age UK, 2022. Research Note: Estimating the number of off-gas grid homes in England using alternative fuels for heating that are eligible for the Home Upgrade Grant (HUG). Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-number-of-off-gass-grid-homes-in-england-using-alternative-fuels-for-heating-that-are-eligible-for-the-home-upgrade-grant-hug-november-2022.pdf>. [Accessed 07/12/22].

<sup>23</sup> Age UK, 2022. Research Note: Estimating the number of off-gas grid homes in England using alternative fuels for heating that are eligible for the Home Upgrade Grant (HUG). Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-number-of-off-gass-grid-homes-in-england-using-alternative-fuels-for-heating-that-are-eligible-for-the-home-upgrade-grant-hug-november-2022.pdf>. [Accessed 07/12/22].

<sup>24</sup> Age UK, 2022. Research Note: Estimating the number of off-gas grid homes in England using alternative fuels for heating that are eligible for the Home Upgrade Grant (HUG). Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-number-of-off-gass-grid-homes-in-england-using-alternative-fuels-for-heating-that-are-eligible-for-the-home-upgrade-grant-hug-november-2022.pdf>. [Accessed 07/12/22].

<sup>25</sup> EEIG, 2022. Energy Security Starts At Home. Energy Efficiency Infrastructure Group. [Online]. Available at: [https://www.theeeig.co.uk/media/1131/eeig\\_invest-to-save-06-22-03.pdf](https://www.theeeig.co.uk/media/1131/eeig_invest-to-save-06-22-03.pdf). [Accessed 25/09/22]. Pg2.

<sup>26</sup> Cornwall Insight, 2022. Predicted fall in the April 2023 Price Cap but prices remain significantly above the EPG. Cornwall Insight. [Online]. Available at: [https://www.cornwall-insight.com/predicted-fall-in-the-april-2023-price-cap-but-prices-remain-significantly-above-the-epg/?utm\\_source=email&utm\\_medium=email](https://www.cornwall-insight.com/predicted-fall-in-the-april-2023-price-cap-but-prices-remain-significantly-above-the-epg/?utm_source=email&utm_medium=email). [Accessed 01/12/22].

<sup>27</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg8.

<sup>28</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg8.

<sup>29</sup> Energy UK, 2022. ECO+: The energy industry's proposal for powering up the domestic energy efficiency market. Energy UK. [Online]. Available at: <https://www.energy-uk.org.uk/index.php/publication.html?task=file.download&id=8297>. [Accessed 02/12/22]. Pg2.

<sup>30</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22].

- 
- <sup>31</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/c onsultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/c onsultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg18.
- <sup>32</sup> Age UK, 2022. Research briefing: Estimating the number of older households in England not to receive the £150 council tax rebate in April 2022. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-number-of-older-households-in-england-not-to-receive-the-150-council-tax-rebate-in-april-2022.pdf>. [Accessed 02/12/22].
- <sup>33</sup> Age UK, 2022. Research briefing: Estimating the number of older households in England not to receive the £150 council tax rebate in April 2022. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-number-of-older-households-in-england-not-to-receive-the-150-council-tax-rebate-in-april-2022.pdf>. [Accessed 02/12/22].
- <sup>34</sup> Age UK analysis of the English Housing Survey; 2019/20.
- <sup>35</sup> Age UK, 2022. Factsheet 1: Help with heating costs. Age UK. [Online]. Available at: [https://www.ageuk.org.uk/globalassets/age-uk/documents/factsheets/fs1\\_help\\_with\\_heating\\_costs\\_fcs.pdf](https://www.ageuk.org.uk/globalassets/age-uk/documents/factsheets/fs1_help_with_heating_costs_fcs.pdf). [Accessed 03/12/22]. Pg7.
- <sup>36</sup> DWP, 2022. Income-related benefits: estimates of take-up: financial year 2019 to 2020. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020>. [Accessed 25/09/22].
- <sup>37</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/c onsultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/c onsultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg25.
- <sup>38</sup> BEIS, 2021. Energy Company Obligation ECO4: 2022 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1010366/eco4-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010366/eco4-consultation.pdf). [Accessed 03/12/22]. Pg31.
- <sup>39</sup> BEIS, 2021. Energy Company Obligation ECO4: 2022 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1010366/eco4-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010366/eco4-consultation.pdf). [Accessed 03/12/22]. Pg31.
- <sup>40</sup> DWP, 2022. Income-related benefits: estimates of take-up: financial year 2019 to 2020. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020>. [Accessed 25/09/22].
- <sup>41</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/c onsultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/c onsultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg25.
- <sup>42</sup> BEIS, 2021. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1010366/eco4-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010366/eco4-consultation.pdf)
- <sup>43</sup> Age UK, 2022. Research briefing: Estimating the impact of rising prices on older households in the UK in 2022-23. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/estimating-the-impact-of-rising-prices-on-older-households-in-the-uk-in-2022-23-may-2022.pdf>. [Accessed 03/12/22].
- <sup>44</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/c onsultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/c onsultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg26.
- <sup>45</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 05/12/22]. Table 19.
- <sup>46</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 05/12/22]. Table 19.



- 
- <sup>47</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 05/12/22]. Table 19.
- <sup>48</sup> MSM, 2022. How changing mortgage interest rates affect your expenses. Money Super Market. [Online]. Available at: <https://www.moneysupermarket.com/mortgages/mortgage-interest-rates/>. [Accessed 05/12/22].
- <sup>49</sup> MoJ, 2022. Mortgage and landlord possession statistics: July to September 2022. Ministry of Justice. [Online]. Available at: <https://www.gov.uk/government/statistics/mortgage-and-landlord-possession-statistics-july-to-september-2022/mortgage-and-landlord-possession-statistics-july-to-september-2022>. [Accessed 05/12/22]. See statistician's comments.
- <sup>50</sup> The Coronavirus Act 2020 extended eviction proceedings between 26th March 2020 and 30th September 2021 and put a stay on possession proceedings until 20 September 2020.
- <sup>51</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 05/12/22]. Table 19.
- <sup>52</sup> Age UK, 2022. Age UK analysis of Living Costs & Food Survey 2019-20.
- <sup>53</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.
- <sup>54</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 13.
- <sup>55</sup> Agility ECO, 2022. Agility Eco Briefing on the ECO+ Consultation. [Online]. Available at: <https://www.agilityeco.co.uk/news/agilityeco-briefing-eco-consultation>. [Accessed 05/12/22].
- <sup>56</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>57</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>58</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>59</sup> BEIS, 2022. Energy Company Obligation ECO4: 2022 - 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1010366/eco4-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010366/eco4-consultation.pdf). [Accessed 01/12/22]. Pg37.
- <sup>60</sup> BEIS, 2022. Energy Company Obligation ECO4: 2022 - 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1010366/eco4-consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010366/eco4-consultation.pdf). [Accessed 01/12/22]. Pg37.
- <sup>61</sup> DWP, 2022. Income-related benefits: estimates of take-up: financial year 2019 to 2020. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2019-to-2020>. [Accessed 25/09/22].
- <sup>62</sup> Age UK, 2021. *Briefing Paper: Digital inclusion and older people – how have things changed in a Covid-19 world?*. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/digital-inclusion-in-the-pandemic-final-march-2021.pdf>. [Accessed 05/08/21].
- <sup>63</sup> Ofgem, 2019. Consumer Survey 2019: Consumer Engagement Survey Tables – Table 637. Ofgem. [Online]. Available at: <https://www.ofgem.gov.uk/publications/consumer-survey-2019>. [Accessed 07/10/21]. Pg36.
- <sup>64</sup> BEIS 2022. Annual Fuel Poverty Statistics in England, 2022 (2020 data). Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1056777/annual-fuel-poverty-statistics-lilee-report-2022-2020-data.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1056777/annual-fuel-poverty-statistics-lilee-report-2022-2020-data.pdf). [Accessed 12/12/22]. Pg38.

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- <sup>65</sup> DWP, 2020. Households Below Average Income 2019/20. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/households-below-average-income-for-financial-years-ending-1995-to-2020>. [Accessed 13/12/22].
- <sup>66</sup> Online and CATI survey conducted by Opinium on behalf of Age UK between 2nd – 20<sup>th</sup> September 2022. Sample of 1402 older adults (60+) in Great Britain, weighted to be nationally representative.
- <sup>67</sup> BEIS, 2022. Fuel poverty detailed tables 2022. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2022>. [Accessed 25/09/22]. Table 26.
- <sup>68</sup> Scope, 2022. Cost of living: the impact for disabled people. Scope. [Online]. Available at: <https://www.scope.org.uk/campaigns/research-policy/cost-of-living-report/>. [Accessed 05/12/22].
- <sup>69</sup> BEIS, 2022. Energy Company Obligation ECO+: 2023 – 2026. Department for Business, Energy, and Industrial Strategy. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1120391/consultation\\_on\\_design\\_of\\_the\\_energy\\_company\\_obligation\\_2023-2026.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1120391/consultation_on_design_of_the_energy_company_obligation_2023-2026.pdf). [Accessed 01/12/22]. Pg39.
- <sup>70</sup> Energy UK, 2022. ECO+: The energy industry's proposal for powering up the domestic energy efficiency market. Energy UK. [Online]. Available at: <https://www.energy-uk.org.uk/index.php/publication.html?task=file.download&id=8297>. [Accessed 02/12/22]. Pg5.
- <sup>71</sup> NEA, 2021. National Energy Action (NEA) response to BEIS ECO4 Consultation. National Energy Action. [Online]. Available at: <https://www.nea.org.uk/wp-content/uploads/2021/09/NEA-response-to-BEIS-ECO-4-Consultation.pdf> [Accessed 06/12/22]. Pg3.
- <sup>72</sup> HM Treasury, 2022. Autumn Statement. His Majesty's Treasury. [Online]. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1118417/CCS1022065440-001\\_SECURE\\_HMT\\_Autumn\\_Statement\\_November\\_2022\\_Web\\_accessible\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1118417/CCS1022065440-001_SECURE_HMT_Autumn_Statement_November_2022_Web_accessible_1_.pdf). [Accessed 01/12/22].
- <sup>73</sup> Agility ECO, 2022. 2030 Fuel Poverty Target will overshoot by over 30 years. Agility ECO. [Online]. Available at: <https://www.agilityeco.co.uk/2030-fuel-poverty-target-will-overshoot-over-30-years#:~:text=The%20Government%E2%80%99s%20statutory%202030%20fuel%20poverty%20target%20to,2065%20to%20achieve%20unless%20further%20funding%20is%20announced>. [Accessed 02/12/22].
- <sup>74</sup> Age UK, 2021. Consultation Response: Energy Company Obligation ECO4: 2022 – 2026. Age UK. [Online]. Available at: <https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/consultation-responses-and-submissions/energy-company-obligation-eco4---maintaining-energy-efficiency-support-from-2022.pdf>. [Accessed 07/12/22]. Pg20.