



## **Warm Wales ECO3 Certification Proposal**

**Commercial - in confidence**

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## **The proposal**

This proposal sets out an offer of services that Warm Wales - Cymru Gynnes CBC (Warm Wales) can provide for Powys County Council.

The proposal is designed to offer a complete bespoke service for the management of ECO3 for the authority.

## **Warm Wales - Who We Are**

Warm Wales - Cymru Gynnes CBC (Warm Wales) is a Community Interest Company, established in 2004, to deliver fuel poverty and associated programmes in Wales and the South West. Its stated mission is:

‘to work with others to alleviate fuel poverty and to provide homes in Wales with affordable warmth. In doing so we aim to make a difference in the everyday lives of people in Wales and the South West by making their homes more energy efficient, healthy, comfortable, durable and affordable’

Warm Wales aims to tackle fuel poverty by bringing together the key solution providers across Wales and the South West and delivering innovative long-term partnerships which will help eradicate fuel poverty on a one-stop-shop basis. In doing so Warm Wales contributes to assisting the Government achieve its sustainable energy objectives. By forging strategic partnerships and delivering fully integrated programmes of work. Warm Wales has, to date, secured investment totalling £60 million for domestic energy efficiency and fuel poverty projects.

## **Principal activities**

To deliver the commitments, stated in the company mission, Warm Wales establishes and manages programmes and activities that:

- Target and reduce the burden of energy costs on the disadvantaged;
- Systematically assess households to determine their energy efficiency needs and fuel poverty status;
- Organise and deliver the installation of a full package of demand side measures and cleaner, reliable and more affordable heating technologies that enhance energy efficiency;
- Strengthen the economic vitality of public-private partnerships;

- Pool the resources of the diverse funding organisations and solution providers;
- Increase the viability and deployment of new energy technologies and innovative solutions in the domestic sector;
- Assist households understand the benefits associated with better energy efficiency;
- Maximise household income by the provision of benefits advice to potentially qualifying households;

### **What is Energy Company Obligation (ECO)?**

ECO places legal obligations on larger energy suppliers to deliver energy efficiency measures to domestic premises. ECO3 will run from Autumn 2018 until March 2022 and delivers energy efficiency and heating measures to homes in Great Britain.

The scheme provides numerous benefits for homeowners, key of which are:

Affordable Warmth – which is focused on low income, vulnerable and fuel poor households. With ECO3, the Government has set the eligibility criteria which will result in approximately 6.6m households being eligible for the scheme. In addition, it will allow up to 25% of the obligation to be met through measures delivered under Local Authority Flexible Eligibility. This is the element which Warm Wales proposes to deliver on behalf of Powys County Council.

Tackling Fuel Poverty Reduction in rural households - to protect rural households, the Government requires suppliers to meet at least 15% of their obligation by delivering measures in rural areas. To strengthen the scheme's link to the Fuel Poverty Strategy further, it also provides an uplift for measures delivered to low-income households living in F and G rated properties under the Flexible Eligibility part of the scheme. Given landlords' responsibilities under the Private Rented Sector Minimum Standard Regulations, the Government has limited the use of ECO in certain circumstances so that landlords do not use it to meet their basic requirements.

Therefore, ECO3 can be considered the key drivers to assist Local Authorities to reduce fuel poverty and reduce carbon emissions from housing stock owned or occupied by those unable to pay for improvements themselves in the area.

## **Opportunities for local suppliers and contractors**

In order to install ECO3 eligible measures, contractors must be accredited to a sufficient level. PAS 2035 covers how to assess dwellings for retrofit, identify improvement options, design and specify Energy Efficiency Measures and monitor retrofit projects.

## **What is PAS 2035**

PAS 2035 sets out a requirement to properly assess all retrofit work and requires a whole house approach to reduce the risk of inadvertently installing measures that negatively impact others.

It contains specification for installers to follow when selecting components, installation methods along with commissioning, including processes, training and qualifications of installers.

The retrofit co-ordinator is the key role, which is basically a project manager with expertise in retrofitting buildings. It is an overarching role with responsibility for co-ordinating and overseeing the activities of the other roles which are all largely self-explanatory: retrofit advisor, retrofit assessor, retrofit designer, retrofit evaluator and retrofit installer.

The retrofit co-ordinator is required to obtain a Level 5 Professional Diploma in 'Domestic Retrofit Coordination and Risk Management'.

## **How local installers can become involved**

This PAS covers work that is initiated, procured, funded and delivered in a variety of ways including, retrofit programmes promoted and/or funded by national or local government schemes such as the Energy Company Obligation (ECO)

Should local installers wish to be accredited there are a number of points to consider such as:

- From 1<sup>st</sup> January 2020 all installers must be able to evidence the incorporation of TrustMark and the new PAS2030:2019 & PAS2035:2019.
- ECO measures (except demonstration actions & some DHS systems) must be installed by a TrustMark registered business
- Measures must be installed in accordance with PAS2030:2019 & PAS2035:2019

However, there is a Transition period for installers to become registered with TrustMark & Certified to PAS2030:2019 that is in place to 30th June 2021, during which measures must be installed to PAS 2030:2017 and be lodged with the TrustMark Data Warehouse before they can be Notified to Ofgem.

There is also a 20% uplift on the deemed score for measures completed by an installer certified to PAS2030:2019 & compliant with PAS2035:2019 during the Transition Period (1st January 2020 – 30th June 2021).

ECO3 suppliers have commented that they would work with the local supply chain within Powys County, should they be able to meet PAS 2035 accreditation.

### **Warm Wales Offer**

Warm Wales take complete control of ECO3 scheme delivery in Powys as a not for profit energy focused Community Interest Company.

Warm Wales would:

- Create a bespoke service level agreement with Powys County Council for delivery of ECO3, detailing operational parameters, local authority costs/potential income from the scheme
- Be named within the 'Statement of Intent' as the council's partner and body responsible for vetting applications
- Perform all necessary vetting/checks in accordance with Powys County Council's published 'Statement of Intent' determining applicant eligibility, thereby delivering an independent, robust and clear audit trail
- Require declarations to be issued direct to Warm Wales by Powys Council. This allows Warm Wales to source the best available deal for qualifying applicants from an array of ECO providers with whom Warm Wales already have direct funding links
- Recover fees associated with ECO3 delivery direct from ECO funding partners
- Develop Warm Wales branded 'Application for Flexible Eligibility' form (see appendix 1)
- Offer a net zero service cost service to Powys Council for delivery of ECO3. Powys would still receive a £90 plus VAT payment for declarations issued direct to Warm Wales post installation i.e. zero financial risk to Powys & reduced financial risk to Warm Wales

## **Confidence in eligibility check**

Warm Wales will assess each application to ensure the applicant meets the set ECO3 criteria

This includes:

- ECO3 Qualifying Benefit checks
- ECO3 Qualifying Disability Benefit checks

Warm Wales will also assess each application against Powys County Council Flexible Eligibility criteria to ensure that applicants in an area are eligible for affordable warmth grants.

Warm Wales will adopt The Department for Business, Energy and Industrial Strategy (BEIS) ENERGY COMPANY OBLIGATION: ECO3, 2018 – 22 FLEXIBLE ELIGIBILITY GUIDANCE and use an income threshold to determine whether a household has a low income and - where households will be eligible if their income is equal to or below the relevant income threshold.

In general, the lower an income threshold the greater the likelihood of households below that threshold being in fuel poverty.

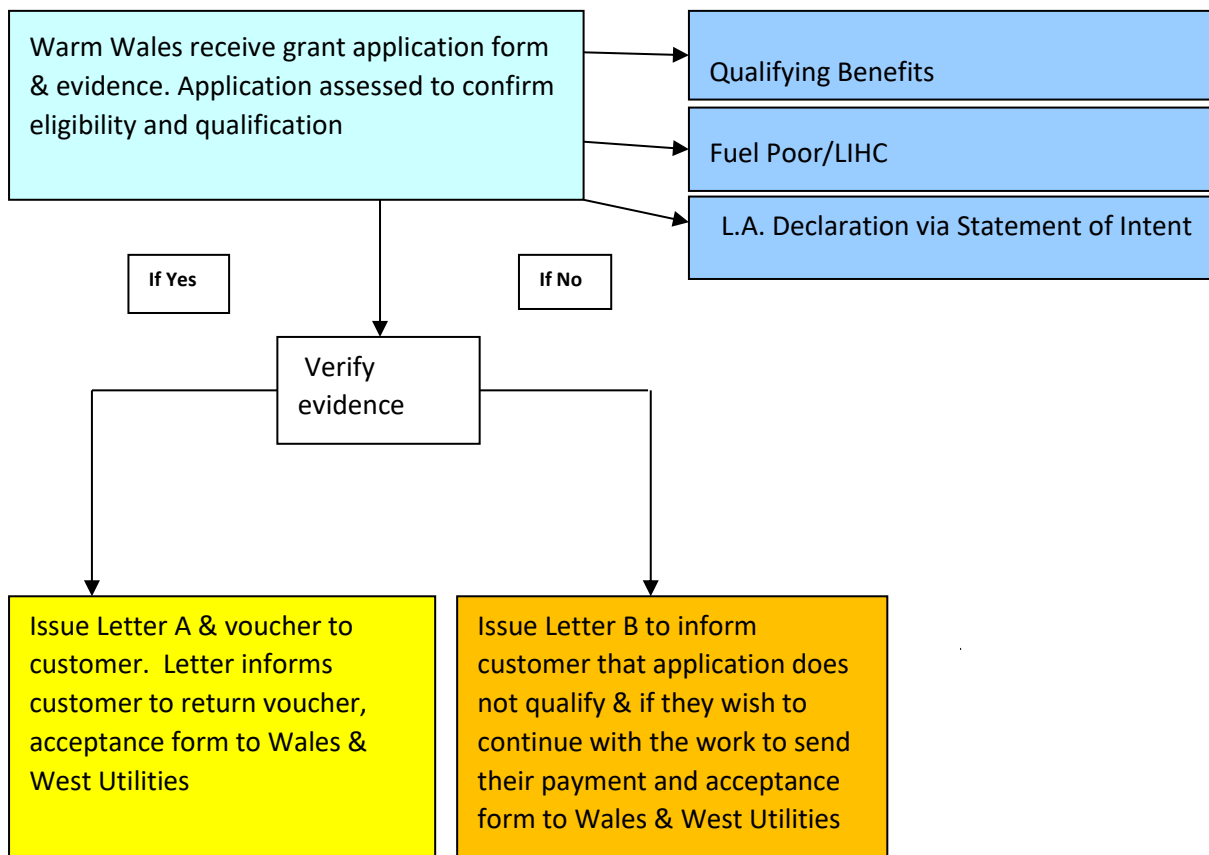
Income here is defined as a household's disposable income after they have paid for their rent or mortgage. This comprises income from all sources, such as net earnings (after tax), income from savings and investments, pensions, all benefits (including housing benefit), and net council tax payments.

All checking of financial and fuel poverty criteria will be completed with full record-keeping. All data stored and shared will be in compliance with GDPR.

Warm Wales has vast experience of managing certification schemes similar to ECO3. Current work includes the management of the Ofgem's Fuel Poor Network Extension Scheme (FPNES) to help households connect to the gas network on behalf of Wales & West Utilities. A partnership dating back to 2009 with the completion of over 12,000 connections.

Through this scheme, Warm Wales is responsible for the certification of grant applications on the scheme. Eligibility rules are similar to ECO3 and the skills gained through its delivery are transferable to this project i.e. assessment of qualifying benefits and of eligibility through Powys Council's Eco Flex declaration via their Statement of Intent.

Please see below a flow diagram to show eligibility process route for FPNES which will be adapted for ECO3:



Flowchart to FPESN self-referral scheme

### Further Information

Warm Wales operate web-based upload and download portals for the secure transfer of customer data and comply fully with data protection regulations. Our central UK data centres are ISO27001:2013 certified and their security features include: 24-7 security on site and redundant and uninterruptible power supplies.

All staff will be dressed in branded Warm Wales clothing with a visible id badge on display.

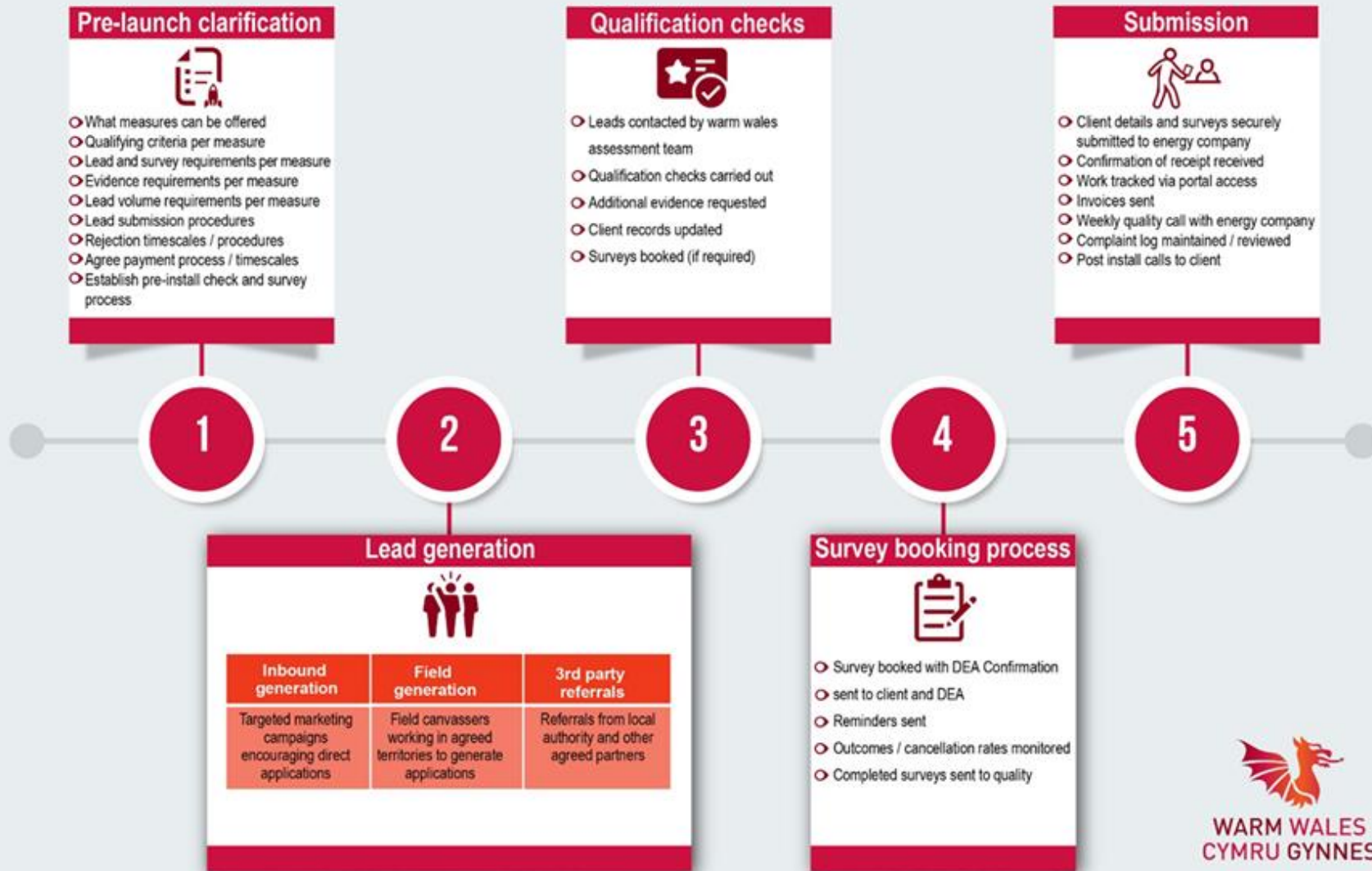
## Additional services

- Warm Wales will work with appointed ECO3 providers to encourage access from the local supply chain. Where possible appointed ECO3 providers will source local resources/sub-contractors when carrying out any works. Appointed contractors from the local supply chain must be capable of meeting all compliance and legal requirements set by the appointed ECO3 provider.
- Warm Wales to establish relationships with doorstep canvassers to ensure quality of leads and eliminate false claims. Our compliance process includes background checks on the canvasser, statistical analysis to identify unusual trends, quality control phone calls and the compiling of daily activity logs.
- Develop a Warm Wales Field Canvass App. The Warm Wales field app will be designed to work on smart phones and tablets for both Apple and Android devices. It takes the canvasser through a structured set of questions relating to the householder, property and eligibility criteria. Where appropriate, the canvasser will be prompted to upload photos of the property and documents to the app. Visit complete, the canvasser will send the survey securely to Warm Wales head office for quality checking. Once sent, the survey will not be visible on the device to protect the privacy of the householder and comply with GDPR regulations.
- Warm Wales would provide a lead upload page for canvassers to avoid danger of paper records, this also reduces the threat of double sales.
- Warm Wales will offer eligible households a Healthy Homes Healthy People service via the phone. This service provides homeowners with advice on a selection of energy related issues - e.g. tariff switching, energy advice, fuel debt advice etc.
- In order to ensure a high-quality service, exclusively from partner organisations and to mitigate against ineligible claims from sales agents, homeowners will be contacted to establish consent has been given. Each householder will be provided with a declaration to sign, to ensure they are comfortable with the work that is to be completed.
- Contact has been made with a further 9 Local Authorities across Wales who have expressed an interest in Warm Wales delivering this model on their behalf. This is an opportunity for Powys to join the consortium, standardising delivery of ECO3 LA Flex.

The ECO3 Lead Generation Process that Warm Wales proposes to manage can be seen on the flow diagram below:



# ECO LEAD GENERATION PROCESS FLOW



## **Cost**

No up-front cost to Powys County Council and declarations issued to Warm Wales would attract a fee of £90 + VAT payable by Warm Wales post successful installation of measure.

Please Note: Fees are derived from individual ECO providers following an assessment and production of a declaration of eligibility, NOT from clients in receipt of successful measures.

We would be delighted to discuss this proposal with you and other ways we can work with Powys County Council.

Jonathan Cosson  
Director  
Warm Wales - Cymru Gynnes

## Appendix 1: APPLICATION FOR FLEXIBLE ELIGIBILITY



This is an application form to ascertain if you would qualify for grant funded heating or insulation measures under a scheme called "ECO 3 - LA Flex". This is a national scheme that is operated by Warm Wales CIC who redistribute money levied from energy companies.

Warm Wales CIC will select a contractor and arrange for and fund work. You will have been given this form by an agent working on behalf of Warm Wales CIC.

The only involvement of Powys Council is to issue a declaration if you are eligible to receive funding under this scheme. The council do not underwrite or take responsibility for works.

### Heating Systems, upgrades and insulation measures.

#### Via - Energy Company Obligation (ECO) Local Authority Flexible Eligibility (LA FLEX)

The aim of the scheme is to install energy efficiency measures in properties that are currently energy inefficient which in turn reduce household fuel bills. This is an opportunity, if your home qualifies, for potential improvements such as a new central heating system, upgrades to the existing heating system and/or insulation measures. Warm Wales will be determining whether households qualify for the scheme based on information supplied from this application form. Declarations for those who could benefit from improvements will be issued direct to the organisation chosen to deliver your installation.

Your chosen organisation will obtain funding from Energy Companies obligated under (ECO) to deliver measures under this scheme. Companies will have a limited amount of ECO funding available and this will be utilised on a first come first serve basis.

### What happens next?

- 1. Complete the application form if you consider yourself in fuel poverty and eligible to apply.**  
Funding is available to owner occupiers and private rented tenants. To be eligible for inclusion of flexible eligibility in Powys your home must be energy inefficient; and/or householder(s) is vulnerable.
- 2. Warm Wales verifies your application – with a fee applied, payable by your installer.**  
The Local Authority will issue a signed declaration to the organisation of your choice.
- 3. The organisation investigates potential measures for installation.**  
The final decision on whether a household receives a measure under flexible eligibility or other ECO funding streams will be made by the organisation who you instruct. Qualification and the declaration by Powys County Council does not guarantee installation of any measures, as the final decision will be made by the supplier.
- 4. Installation of qualifying measures.**  
If your property is considered suitable for measures then the organisation will commission the work. Permission and access will need to be provided by the owner and resident to enable the smooth delivery of works.

Please complete the following Application Form and arrange for your chosen supplier to return, with supporting evidence (where applicable) to the address, or email on the top of the form. Your application will be considered and if it is determined that you and/or your property are eligible a declaration will be issued to your chosen supplier. The declaration can only be used to obtain energy efficiency measures, e.g. heating systems and insulation from your chosen supplier while funding remains available.

## APPLICATION FOR FLEXIBLE ELIGIBILITY: Energy Company Obligation (ECO) Regulations 2018 onwards (ECO3 LA Flex under Powys county council statement of intent Version 2)



This form must be completed in partnership with an agent/company as they are able to unlock the funding. Please do not submit it to Warm Wales on your own.

You the applicant, should not be charged to have this application submitted.

**Exaggerating personal circumstances and/or making a false statement on this form could be considered a criminal offence and may result in prosecution and/or removal of any grant funded measure.**

### PART 1

#### 1 Please tell us about your household income

To qualify you must have a household income equal to, or below, the values listed in the table below, for the size of your family, after housing costs have been deducted. Please study the table and pick the band that applies to you. Housing costs are defined as rent or mortgage expenses.

As part of the application process we will require evidence of income and housing costs.

Household size	Income after housing costs	Tick	Household size	Income after housing costs	Tick
1 ADULT	£9,300 or less		2 ADULTS	£15,200 or less	
and 1 child	£12,200 or less		and 1 child	£18,200 or less	
and 2 children	£15,000 or less		and 2 children	£21,100 or less	
and 3 children	£18,000 or less		and 3 children	£24,100 or less	
and 4+ children	£21,000 or less		and 4+ children	£26,800 or less	

2 Applicant's Name: \_\_\_\_\_ Title: Mr/Mrs/Miss/Other: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_ Post code: \_\_\_\_\_  
Home Tel. No: \_\_\_\_\_ Work Tel. No: \_\_\_\_\_

3 Applicant's Date of Birth: \_\_\_\_\_

4 Please give the following details of the property to which the application relates:

Address: \_\_\_\_\_  
\_\_\_\_\_ Post code: \_\_\_\_\_

☐ **OR** Tick here if address is same as above





Property type (Please provide details to what best describes your property):

- ☐ House   ☐ Mid Terrace   ☐ End Terrace   ☐ Semi-detached   ☐ Detached  
☐ Bungalow   ☐ Mid Terrace   ☐ End Terrace   ☐ Semi-detached   ☐ Detached  
☐ Maisonette   ☐ 1 or 2 external walls   ☐ 3 external walls  
☐ Flat   ☐ 1 or 2 external walls   ☐ 3 external walls  
☐ Mobile home

Property Age: \_\_\_\_\_

5 Do you live in the property as your only or main residence? ☐ Yes ☐ No

6a Do you live in the property as your only or main residence? ☐ Yes ☐ No

6b Are you a tenant? ☐ Yes ☐ No

7 If you are a tenant at the property, please give details of your landlord:

Landlord's Name: \_\_\_\_\_ Title: Mr/Mrs/Miss/Other: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_ Post code: \_\_\_\_\_

Home Tel. No: \_\_\_\_\_ Mobile No: \_\_\_\_\_

## PART 2 - Qualifying Criteria

i) If there is an EPC (energy performance certificate) for the property, is it in:

Band	Tick box	Action
A, B, C or D	<input type="checkbox"/>	You do not qualify sorry, do not continue with the form
E	<input type="checkbox"/>	Go to iii) below
F or G	<input type="checkbox"/>	Go to declaration

ii) If there is no EPC for the property, complete the table on the following page:

**DO NOT FILL OUT IF YOU HAVE ANEPC**



House Features	Type	Points	Tick box	Score
Bedrooms	1	1		
	2	2		
	3+	3		
Household occupants	1	1		
	2	2		
	3+	3		
Loft insulation	None	5		
	Up to 150mm	3		
	150mm and above	1		
Wall type	System built	5		
	Solid stone/brick	3		
	Cavity construction/ unknown	1		
Wall insulation	External	1		
	Internal	1		
	Cavity	2		
	None	5		
Heating fuel	Mains gas	1		
	Oil	2		
	LPG	3		
	Electric	5		
	Solid Fuel	5		
Central heating system age	Less than 10 years old	1		
	Over 10 years old	3		
	Broken system	5		
	No system	5		

Points	Tick box	Action
<b>NOT VALID IF YOU HAVE AN EPC</b>		
Less than 10 points (and no EPC)		You do not qualify sorry, do not continue with the form
10 or greater and less than 15 points		Go to iii) below
15 points or greater		Go to declaration

iii) **Client Vulnerability** - Do not fill out if you have an F or G EPC or no EPC and 15 points:



A member of the household is:

Details	Tick box	Proof seen	Print and signed	Dated	Action
Aged over 60 (Proof of Age and address of person)					Go to signed declaration
Children in education and pregnant mothers (Proof of child age/Further education or Maternity details)					

A member of the household is:

Health Condition - The following require a signed declaration by doctor or health practitioner to confirm any health-related issues		Yes	No
1.	Aged over 60 (proof or age necessary)		
2.	Children under 5 and those in primary and secondary education or pregnant		
3.	Respiratory disease (COPD, asthma)		
4.	Cardiovascular disease		
5.	Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)		
6.	Substance misusers		
7.	Dementia		
8.	Neurobiological and related diseases (e.g. fibromyalgia, ME)		
9.	Cancer		
10.	Limited mobility		
11.	Haemoglobinopathies (sickle cell disease, thalassaemia)		
12.	Severe learning disabilities		
13.	Autoimmune or immunodeficiency diseases (e.g. MS, diabetes, HIV)		

Signed declaration by doctor or health practitioner to confirm any health related issues i-xi.

Condition	Doctor	Surgery	Signed	Dated

## DECLARATION - To be completed in respect of all applications

**WARNING: if you knowingly make a false statement you may be liable for prosecution.**

I declare that to the best of my knowledge the details I have provided are correct.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

☐ **Please tick** - I confirm I have read the cover page and understand the process

By signing you will also consent to have your details audited by the council in the event you are selected as part of a sample verification check.

Warm Wales accept no responsibility or liability resulting from any negative consequence, damage or loss arising from an ECO FLEX grant being accepted or arising from works or efforts connected to the preparation, application or survey prior to a grant.

Warm Wales do not endorse any specific energy supplier, grant agent, installer or company connected to the application or installation of ECO flex grants or products. This also applies to those identified on the published list of known contractors.

In the event of liability against an agent/contractor, the maximum liability Warm Wales would entertain is for the refund of the declaration fee.

Any grievance or issue raised against grant works or application process, should be taken up with Warm Wales, installing party, agent or financier. Powys County Council's involvement in the scheme is limited to the declaration of eligibility for a grant, should you wish to have the declaration explained in further detail, please email - [information@warmwales.org.uk](mailto:information@warmwales.org.uk)

### To be filled out via agent

Please identify the measure/s being applied for:

☐ **Please tick** - I confirm that the client has been informed about the acquisition, use and storage of their data as part of this process



