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Consultation Response

Which? response to the Department for Energy Security and Net Zero Warm Homes Fund - call for evidence

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Summary

Which? welcomes the opportunity to provide evidence to support the development of the Warm Homes Fund. Our answers focus on opportunities for the Warm Homes Fund to support homeowners to make home energy upgrades through the provision of safe financial products that meet consumers' needs.

The Warm Homes Fund can improve the affordability of home energy upgrades by increasing the choice of financial products that spread the upfront costs of installation and reduce the interest rates charged to consumers. This will help households that can afford these repayments, however increasing monthly outgoings is not an option for some low and middle income households who are already struggling to make regular payments and making adjustments to meet essential spending. The government offers grant funding for some low income households and the BUS grant for installing heat pumps, but there is a need for targeted support to help households not eligible for full grants but unable to afford additional payments. This should include a mix of grant funding and access to zero interest loans tailored to the household's income. This is critical to ensuring households that are struggling with high energy costs are not excluded from the potential benefits of solar panels, batteries and electrified heating.

We have provided some research findings showing homeowners' interest in different financial products to fund home energy upgrades, however it is important to recognise that affordability isn't the only barrier preventing consumers from making these changes. Our research with homeowners that had considered purchasing a heat pump, but were undecided or who had decided not to, suggests that the complexity of the decision and uncertainty about important points, such as the impact on future energy bills and the effectiveness of a heat pump in heating their home, were also significant barriers preventing them from going ahead. The success of the Fund will depend to a large extent on the

progress the government and businesses make in providing consumers with greater reassurance around these points.

In relation to the financial products and home energy upgrades that the government supports through the Warm Homes Fund it is important that the government uses this intervention to require high levels of consumer protection.

- The government should mandate that all home energy upgrades funded by financial products which are supported by the Warm Homes Fund meet required standards and are completed by certified installers. The certification should offer protections not less than is currently available through the Microgeneration Certification Scheme (MCS).
- Existing financial consumer protections such as section 56, section 75 and section 140a of the Consumer Credit Act should not be watered down or exempted for financial products supporting home energy upgrades, as this moves the burden of risk from lenders to consumers.
- The design of more innovative financial products such as Third Party Ownership agreements must address potential consumer concerns in relation to protection in the event of a default, fair terms and conditions, adding complications or cost to the home selling process, and maintaining the consumers' ability to choose tariffs and services.
- Consumers need clear information and advice, particularly in relation to innovative financial products. The government and providers should explore the potential to require key information documents that provide clear and comparable information about the products. Intermediaries or comparison services must be transparent about how much of the market they cover.
- The fund should look for opportunities to incentivise the use of Smart Meter Enabled Thermal Efficiency Ratings technology (SMETERS) and other monitoring equipment that provides actual performance data about the measures supported by financial products. This equipment raises standards in the sector and offers real benefits to the homeowner and the financial provider.
- The government should have a clear strategy for ensuring that the availability of additional government funding does not lead to an increase in scams in this sector.

Full response

Section 1: Warm Homes Fund strategic case, aims and scope

Question 1: Do you agree with our assessment of the strategic opportunities, challenges and risks presented by warm homes financial transactions? Please provide evidence to support your response.

We agree that low carbon technologies such as solar panels, batteries and heat pumps can offer households significant savings and a well installed system coupled with appropriate tariffs will provide consumers with lower bills, greater reassurance about future costs, and warm, comfortable heating.

Our [research](#) shows that many homeowners are open to installing solar panels and batteries (62% solar panels, 57% energy batteries). There is less openness to installing heat pumps (33%), however this has seen a significant rise from 26% a year ago.¹ Despite the improving consumer interest in these products, many continue to experience significant barriers which are discussed in answer to questions 2 and 3.

Question 2: What evidence is there on the factors that most significantly limit the uptake of green finance?

Our [sustainability tracker](#) identifies the upfront cost of installing heat pumps and solar panels as the main barrier to adoption (67% and 58% respectively). Whilst the price of solar panels and batteries has fallen dramatically,² and battery prices in particular are expected to continue to fall, high prices are likely to continue to be a barrier for many households. Financial products can help to spread these costs, and households will hopefully benefit from savings during this time, however many households will still struggle to afford repayments or not be in a position to risk higher outgoings. We have provided more evidence on this issue in response to question 4.

High upfront costs are also not the only barrier. If cost was the only barrier, many more households that can afford to invest in these products would have done so, and the uptake of financial products to support their installation would be higher than it has been. Our [research](#) identified concerns about effectiveness (40% for heat pumps), the impact of the installations on future energy bills (28% were unsure whether heat pumps would add to their

¹ [Warming up for change: homeowners uptake and attitudes towards home energy technology](#), Which?, 2026.

² <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/>

bills and 28% were concerned that solar panels would not reduce their bills enough) and suitability for their home (20% for solar panels).

Our recent research (to be published in June 2026) with homeowners that have considered purchasing a heat pump but who have not yet decided to go ahead, also demonstrates the importance of other factors beside the upfront costs. In particular the homeowners we spoke to were concerned about the lack of certainty around the impact that a heat pump would have on their future energy bills and the effectiveness of a heat pump in heating their homes. This reflects the lack of clear guidance on the impact a heat pump may have on energy bills, and homeowners difficulty in finding good quality information and advice about what is required to install a heat pump.

Interestingly these factors may also be closely related to households' lack of familiarity with these products. Our research shows that homeowners that know friends or family with a heat pump or solar panels are much more likely to consider installing one themselves (heat pumps 55% vs 30%, solar panels 73% vs 58%). This suggests some of these barriers may decrease as adoption rises.

However uncertainty is likely to remain a major drag on demand for the electrification of heat and therefore the government should look to:

- Remove levies from electricity bills to provide greater certainty around the impact of electrification on future bills. This would deliver substantial benefits to electrically-heated households and reduce the risk that households make insufficient savings following the adoption of low carbon technology. In addition, removing levies from electricity bills will widen the opportunities for electricity suppliers to develop attractive flexible energy use offers, including for example in "demand turn-up" scenarios where there is excess electricity being supplied to the grid, but final consumption levies still act to reduce demand."
- Continue to make the certification of installers a requirement for any measures installed with government support, whether that support is in the form of a grant or a subsidised financial product or a feed in tariff.
- Support the widespread adoption of performance monitoring equipment in the installation of energy upgrades. This will give homeowners and lenders greater certainty around the effectiveness of the measures installed.
- Ensure the provision of good quality information and advice through their own services and by working with other providers to support consumers making well informed decisions about the measures that are best suited to their homes.

Question 3: What wider loan or equity-based interventions in the warm homes market could unlock demand at scale?

We recognise the need for a variety of financial products to meet households' different needs and preferences. Consumers will also need to have confidence in these products and good quality information in order to make an informed choice, particularly in relation to new and innovative products .

In our recent research to be published in June 2026 we discussed financial products with homeowners including low interest loans, property linked finance, and third party ownership models including heat as a service.

Most households prefer to pay for home energy upgrades from savings where possible. Households that do consider using a financial product are more likely to choose a traditional short term loan for a single measure, or extending their mortgage for more expensive upgrades that combine different measures. There is currently limited interest in more innovative products, and providers will need to address some substantial consumer concerns and questions.

The potential growth in financing options for households, including innovative products, highlights the need for good quality information and advice, including Key Information Documents that allow consumers to compare the attributes of different products.. Depending on how quickly the market grows there is also the potential for intermediaries and comparison tools to support consumer choice. As in other markets these services should be carefully regulated to ensure they are transparent about their market coverage and any commissions that are received.

An interesting finding from this research was the positive response that homeowners had to combining a heat pump with solar panels and a battery, which was a major focus in the Warm Homes Plan. The homeowners in our research intuitively saw the benefits that this would have in reducing their energy bills and shielding them from the unpredictability of changing energy costs. However a major barrier was the significant upfront cost in purchasing and installing more equipment. Financial products have the potential to support consumers with these costs, potentially with the savings made on energy bills making a contribution towards the repayments. However great care would need to be taken in how any such product was sold due to the uncertainty around energy prices, the performance of equipment and the level of savings achieved. Similar concepts, including the "Golden Rule" introduced under the Green Deal, had to be abandoned when the savings weren't sufficient to match the interest rates being charged.

Addressing concerns about how financial products will impact on the home selling process may also help to address consumer concerns. In our research we found significant concern

about the effect that property linked finance and third party agreements may have on the ability to sell a home, and a fear that these products would complicate the process of selling a home and potentially discourage potential buyers.

Question 4: How should the Warm Homes Fund ensure that it includes an offer suitable for those on low incomes? Any information on specific models is encouraged.

Many low and middle income households are not in a position to afford additional payments for home energy upgrades. Currently, our research shows that one in 13 households (7.5%) report missing an essential household payment every month. This increases to 13.4% amongst working age households with an annual income below £28,000. Additionally, over half of all UK households (52%) are making adjustments each month to cover essentials such as utility bills, housing costs, groceries, school supplies and medicines. The most common behaviours are cutting back on essentials (28%) and dipping into savings each month (27%).

Some of these households will be eligible for grant funding however there is a risk that many households will be excluded from the potential benefits of home energy upgrades because they do not meet the criteria for grant funding and are unable to afford a financial loan. The government should introduce a tapered offer to ensure that these households are able to receive some grant support, potentially combined with a zero or low interest loan where this is appropriate. There should also be flexibility to take account of households that have a particular need due to old age, health conditions or a young family.

Projects such as the Eon next battery trial in Coventry and Glasgow³ demonstrate the potential savings that can be made if low income households have access to the right technology. With the right financial offer and installation, it is possible that monthly savings could exceed monthly repayments. This has the potential to enable the household to reduce their costs from day one, however great care needs to be taken to ensure consumers are not encouraged to take out a loan on the expectation of savings that cannot be guaranteed, particularly if they are not able to afford repayments without the savings. Our answer to question 2 suggests some of the actions the government can take to reduce or remove risks for homeowners.

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<https://news.eonenergy.com/news/smart-saver-e-on-next-launches-enhanced-battery-trial-in-coventry>

Allowing flexibility to include some costs not directly related to energy upgrades may also support low income households, for example where roof repairs are needed before solar panels can be installed. Households may not be able to pay for this work from savings or other sources and as a result the upgrade won't be possible. In Ireland Home Energy Upgrade Loans allow up to 25% of the loan amount for non-energy related home improvements.

Social Enterprises such as Lendology have developed a model of funding that earns a return on public money whilst enabling lower income households that may not be eligible for a commercial loan to benefit from home energy upgrades. Loans are often for periods of up to 15 years and households are required to take out a title registration that is removed when the loan is repaid, or on the sale of the property, at which point the loan can be paid using the income from the sale. The title registration enables lending to households that don't have a good enough credit rating to get a commercial loan.

Question 5: Do you agree with the proposed overarching aims of the Warm Homes Fund? Please provide evidence to support your answer.

We welcome the focus on reducing energy bills which is a clear priority for consumers.

We are unclear why the statement focuses on supporting the building upgrade supply chain and doesn't also include the need to support consumer demand. Related to this point we recommend the government include a commitment to ensuring good quality installations and positive outcomes for households as both will be critical to the success of the fund.

Question 6: Do you agree with the proposed technology scope and are there any technologies missing that you think the fund should focus on? Please provide evidence to support your response.

We broadly agree with the technologies proposed. We are unclear why smart meters should be included when there is already an obligation on energy companies to support their installation.

Whilst the installation of these technologies should be the primary purpose of the fund, it would be useful to clarify how the government will manage the flexibility needed to support other measures that may be needed in order for the primary technologies to be installed. This will be particularly important for low income households that may be prevented from installing the energy efficiency measures because they can't afford the associated work. An

example would be the need to make repairs to a roof to install rooftop solar panels, or to upgrade an electrical consumer unit or wiring to manage solar panels or plug in solar panels.

Many households will also be making home energy upgrades at the same time as other home improvements. Whilst we understand the need to target government funding this should be managed in a way that it doesn't create an excessive burden for installers or households trying to manage the financing of a project.

Question 7 - 12: No response

Section 2: Investing across the value chain

Section 2A: Owner-occupiers

Question 13: How do you think the Warm Homes Fund could best support owner occupiers to invest in home upgrades?

There is potentially an important role for the Warm Homes Fund in supporting financial providers to increase the range of financial products available so they meet the needs of more households, and critically reduce the interest rates charged. This will make home energy upgrades more affordable, and for those households that can afford repayments, this will unlock a major barrier to accessing the benefits that can be realised. We have set out some of our research findings around homeowners' preferences for different financial products in answer to question 3.

However, given the range of factors that a financial provider can use to set the interest rate for a product we are unclear how the Warm Homes Fund will ensure that the subsidy that it provides is passed on to homeowners through the provision of more low or zero interest rate products compared with what would otherwise have been available. The strategy appears to rely on growing demand and competition in the market which will incentivise financial providers to offer low rates. The success of the Warm Homes Fund will therefore be heavily reliant on other measures that the government and businesses take to increase demand, some which we have set out in answer to question 2. However the government needs to be alive to the risk of market failures and have robust and prompt monitoring plans to understand what is happening in the market and take steps to fix issues if there are market failures that stop competitive pressures from driving interest rates down.

In addition to the Warm Homes Fund increasing choice and reducing costs for consumers, the Fund also has the potential to raise standards in the sector by requiring or incentivising best practices. As noted above, we would expect the Fund to require home upgrades to be completed by certified installers. This is currently the case for any upgrade funded by a government grant and for solar panels and batteries to qualify for the Smart Expert Guarantee. The fund could also support best practices in relation to:

- The provision of good quality accessible information and advice,
 - Fair terms and conditions, particularly for innovative products that may have long term agreements, post installation support, effective complaint handling processes, financial protection, and redress.
-

Energy Performance Certificates (EPCs):

Question 14: How are financial institutions currently using EPCs to inform their financial products, and are there any other implications of the use of EPCs for financial products that we should consider?

We understand that financial institutions are currently using the headline energy cost metric in EPCs to make lending decisions. This is an aggregate measure that gives some indication as to the relative energy efficiency of the property but doesn't provide information about the absolute energy costs or the environmental impact of the property which are likely to be the most relevant factors for financial institutions. The new EPCs will give financial institutions much greater choice as to which metrics to use, though this should be balanced by the need to have a straightforward and predictable approach.

At this stage it is difficult to say how financial institutions might use the new metrics in funding decisions as there hasn't been a decision as to how these metrics will be calculated. Depending on how the final EPC metrics are calculated, for lending decisions based on the property as a whole (such as a mortgage) the overall cost metric could be used as this will in future be more aligned with the actual cost of providing heating and hot water in the home and will be influenced by the new fabric performance, heating and smart metrics. Critically, the new heating metric must ensure that homeowners are no longer penalised for choosing low carbon efficient heating systems. This is in line with the government's proposals in the consultation on the Home Energy Model, and we would expect them to be adopted in the new EPC.

The availability of metrics for heating, fabric performance and smart readiness also create the possibility of assessing improvements in each of these areas by using the relevant metric. However this could lead to an overly complex and burdensome process, when the installation of the measure itself (eg a heat pump, solar panels or insulation) should be sufficient evidence to support funding. We are also not convinced that the additional cost of getting an extra EPC would be justified.

Finally, the use of actual performance data in measuring the performance of insulation and heating systems offers real benefits to both financial institutions and homeowners as it provides reassurance that the measures are performing as they should. As such, the fund should look for ways to incentivise the use of SMETERS and other monitoring equipment with the aim of their use being standard practice in the future.

Low and no interest consumer loans:

Question 15: How could the loans scheme be designed to encourage new products or entrants into the market?

Our recent research to be published in June 2026 suggests that most homeowners considering a financial product to support the purchase of a heat pump have a preference for 'traditional' short term loans or mortgages. Low or zero interest rates were obviously preferred. Homeowners felt that loans would create less complications in the event that they wanted to sell their home, and gave them greater 'control' over their heating and their home compared to newer third party ownership agreements.

It is likely that homeowners also feel that the protections associated with these products are well established, and therefore any attempt to reduce these protections at this point could have a negative impact on consumer preferences. We are therefore concerned that proposals to reform the Consumer Credit Act and the Financial Ombudsman Service could undermine consumer confidence at this point.

Despite this preference for more traditional loan products, there was some openness among a smaller group of homeowners to consider more innovative products, however clear communication was critical and adoption would be dependent on questions and concerns being addressed.

Question 16: What loan attributes (for example, lower interest rates, stronger consumer protection, an easier customer journey, more innovative finance products) would be most valuable to expand in the market?

Given the ongoing cost of living crisis and the high cost of some home energy upgrades, the ability of financial products to make these changes more affordable will be critical. Alongside this consumers will also look for products that are easy to use and have robust consumer protections. Protections are likely to be particularly important in relation to new and more innovative products.

Consumer protections. Most homeowners have a positive experience of home energy upgrades but strong consumer protections will prevent the widespread harm to homeowners that has been seen in previous scandals such as ECO4 external wall insulation and the selling of solar schemes, it also reduces risk for lenders, and protects the reputation of reputable traders operating in the sector.

Therefore we strongly recommend that government backed financial products must provide robust consumer protections and that key elements of the Consumer Credit Act including section 56, section 75 and section 140a remain in place to protect consumers in this sector. There should also be effective processes to ensure that the products that are installed with

the support of government backed loans meet relevant standards and the installers are certified by government backed schemes. Recommendations made by the Competition and Markets Authority in relation to the sector including marketing and reforms to the standards landscape should be taken forward in the design of the Warm Homes Fund and used within the industry. This will help to reduce risk for both lenders and consumers.

We expect the government consultation on consumer protection in summer 2026 to address these issues and establish effective structures and standards for protecting consumers in this sector. Given the growth of smart energy tech and the benefits that it can offer consumers, we recommend that the government also include in the consultation how to ensure software is supported for the expected lifetime of these products and protection in the event that a provider goes out of business.

When problems do arise in this sector, consumers can find it difficult to identify where the fault lies and the correct route for resolving a dispute due to the different companies involved in financing and installing energy improvements. Consumers can also be passed between different companies or bodies. The government should ensure that companies benefiting from the Warm Homes Fund have clear guidance as to how complaints and disputes should be handled and this guidance is also made available to consumers.

There are specific consumer protection issues in relation to some of the more innovative financial products that the government should address before supporting these products through the Warm Homes Fund. See our answers to question 40 for more details.

In the past the availability of government grants or subsidies has also led to an increase in scams. We'd therefore encourage the government to develop a strategy for how they will work with businesses, local authorities and consumer groups to prevent and identify scams that may target the availability of financial products backed by the Warm Homes Fund.

Low or zero interest rates. This is clearly a major factor for homeowners and will be critical in deciding whether homeowners can afford these products. Whilst we agree with the government's aim of reducing interest rates, the model that the government has proposed will mean that it is ultimately for financial providers to determine the rates charged and factors including their calculations of risk, credit history etc may result in higher rates being charged. See also our answer to question 13.

Supporting informed choices. One mechanism for keeping rates low will be to encourage competition in the sector by supporting the provision of comparable information through Key Information Documents and easily accessible comparison services. The development of comparison tools has been challenging due to the difficulty of comparing products with different attributes but also low demand not justifying the investment to develop and maintain the services

Flexibility. Homeowners should have some flexibility to include additional 'ancillary' or 'enabling' works under a loan if those costs are necessary for the measures to be installed

and the household to feel comfortable in their home when the work is complete. For example, the installation of solar panels may require a consumer unit to be upgraded or repairs made to the roof. Redecoration may also be required where the original decoration has been damaged. Currently the grant includes making ready for decoration but not the decoration itself. If homeowners are not able to include these costs it may prevent them going ahead with the project. In Ireland [Home Energy Upgrade Loans](#) allow up to 25% of the loan amount for non-energy related home improvements. This would also support homeowners that may be installing home energy upgrades as part of a wider home improvement project and for whom the splitting of invoices can create additional hassle and confusion.

A simple and straightforward process. The ease with which the loan process works can have a significant impact on the success of the scheme. One of the successes of the Boiler Upgrade Scheme is that the application is made by the installer. This means they develop experience in applying and remove that burden from homeowners. The loan should also be made available when consumers need it. One of the criticisms of the Scottish system has been that loans take too long to be agreed resulting in homeowners having to find a way to pay for the installation up front themselves.

Property Linked Finance (PLF):

Question 17: Would Property Linked Finance (PLF) support the draft Warm Homes Fund aims, when could benefits be realised, and what risks need to be considered? Please give evidence to support your answer.

In our recent research to be published in June 2026 we discussed property linked finance with individual homeowners and in group settings. Homeowners understood the problem that Property Linked Finance was seeking to address, however there was significant concern as to the impact it might have on selling their home. This concern related to both the process of selling their home and the additional paperwork required, and the impact that the loan might have on prospective buyers. This was seen as a major disincentive for taking out this sort of loan.

In order for PLF to be successful, homeowners are likely to require considerable reassurance that PLF will not result in additional complications and costs when selling their home. It will be harder to provide reassurance in relation to the impact it may have on prospective buyers as this will only be seen over time and could also be affected by public perceptions or otherwise around the desirability of low carbon tech. It may therefore take some time for PLF to become a common means for homeowners to finance home energy upgrades.

Question 18 - 20: No response

Section 2B: Landlords and tenants

Section 2C: Local government

Section 2D: Electricity market participants

Question 21 - 39: No response

Solar and energy as a service models

Question 40: Would the energy as a service models outlined (or any others, including those emphasising consumer-led flexibility) support the draft Warm Homes Fund aims, when could benefits be realised, and what risks need to be considered? Please give evidence to support your answer.

Our response primarily relates to energy as a service and third party ownership agreements. We are aware that the names, definitions and characteristics of these products vary. This is inevitable given the innovative nature of these products but it can make it difficult to understand the implications for consumers. Clear definitions and categories based on the specific attributes of the products would help progress discussions about the benefits and risks involved.

We agree that some of these innovative products and services have the potential to remove upfront costs for homeowners, optimise the use of the equipment, and provide reassurance through maintenance and repair agreements.

Understandably homeowners have a number of questions about these newer financial products - and some scepticism. In order for new and innovative products to be successful, consumers will need to have confidence that products are properly regulated and that robust consumer protections are in place. We are therefore concerned that proposals to reform the Consumer Credit Act and the Financial Ombudsman Service could undermine consumer confidence at this point.

As with all financial products supporting home energy upgrades, relevant consumer protection legislation, FCA rules, the Consumer Credit Act, and mandatory certification requirements should apply. Given the relatively complex overlap of these requirements the

government should consider providing guidance to companies considering products in this space.

In our recent research to be published in June 2026 we discussed Third Party Ownership and Heat / Energy as a Service options with homeowners. Understandably most of the homeowners we spoke to were unfamiliar with these products although several saw similarities with mobile phone contracts or new car financing. Some homeowners were concerned by the idea that they would not own their heating system - something they saw as part of their house. As these are new products there were inevitably a lot of questions particularly, in relation to Heat or Energy as a Service, how the homeowner estimates their energy use and pays for energy that exceeded what had been agreed with the provider.

In relation to risks and unintended consequences we identified a number of issues in a briefing [Financing for Low Carbon Heating](#). The consultation has identified some of these issues, including:

- **Protection for homeowners that default on payments** or who need to terminate the agreement. Whilst we agree that companies are unlikely to reclaim products that have been installed in homes we are concerned that some products could be decommissioned or companies could seek compensation for products that they are unable to remove. We would recommend that all providers are subject to the equivalent of OFGEM licensing conditions that regulate energy providers responsibilities in the case of a default..
- **The ability to change energy suppliers and tariffs.** Given the potential length of these agreements it is important that homeowners are able to switch energy providers where another provider or tariff offers better value or better meets their needs. The same flexibility should be available for maintenance and optimisation services. Consumers should be able to switch providers without invalidating guarantees.
- **Ensuring agreements don't cause unnecessary friction in the event that the home is sold.** This was a significant concern that emerged in our research, with several homeowners raising concerns about how these agreements might affect the process of selling their home and prospective buyers.

We agree that these are significant issues and will need to be addressed before these agreements receive any form of government support.

In addition:

- **Consumer hire agreements.** We are concerned that consumer hire (leasing) agreements offer lower levels of protection compared to other TPO agreements and

these should be fully addressed before these agreements are used to support subscription or TPO agreements.

- **Accessible information.** Given the length of these agreements and that these products will be new to most homeowners it is important that they have accessible information about the key attributes of the product. The government should consider guidance on Key Information Documents that clearly identify information that should be included in consumer communications.
- **Flexible terms and conditions.** Given the length of these agreements it is likely that homeowners may want to make changes to their property or that their circumstances may change. Consumers should be made aware of terms and conditions relating to each party's responsibilities in the event of any such changes and any fees or charges that might apply.
- **Protections in the event the provider goes out of business.** Consumers should be assured that if their current provider goes out of business, the agreement will be transferred to a new provider on the same basis, and if this isn't possible ownership transfers to the homeowner and will be able to identify companies that provide a suitable tariff, and service and maintenance agreement.
- **Complaints and redress.** Consumers must have clarity as to the processes they can follow in the event of a complaint or a dispute, including which ADR or Ombudsman scheme will handle disputes. This will be particularly important in the event that different providers are involved in the installation, financing and ongoing services. Installers should have strong financial protections as agreed under the new MCS installer scheme and any future reform of the Consumer Credit Act, including in relation to Green Finance, should maintain important protections such as Section 75 as this provides homeowners with an important route to redress and supports consumer confidence in the sector.

Question 41 - 44: No response.

Loans to enable network connections

Question 45 - 48: No response

2E: Manufacturing and supply chain

Question 49 - 70: No response

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About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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