

Administration of the Boiler Upgrade Scheme decision

Subject	Details
Publication date:	7 April 2022
Contact:	Cissy Edathanal, Senior Policy Advisor Hiral Shah, Senior Policy Advisor; Nikhil Kotecha, Senior Policy Advisor
Team:	Policy, Delivery & Schemes
Email:	future.heatpolicy@ofgem.gov.uk

Ofgem has been named by the Department for Business, Energy, and Industrial Strategy (BEIS) as the administrator of the Boiler Upgrade Scheme (BUS). BEIS consulted on the proposed policy and issued the subsequent government response in October 2021.¹

On 16 December 2021 we published a consultation seeking views on our proposed administration of the BUS.

This document summarises the responses to our consultation and details our final administrative position.

¹ [Future support for low carbon heat - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/future-support-for-low-carbon-heat)

© Crown copyright 2022

The text of this document may be reproduced (excluding logos) under and in accordance with the terms of the [Open Government Licence](#).

Without prejudice to the generality of the terms of the Open Government Licence the material that is reproduced must be acknowledged as Crown copyright and the document title of this document must be specified in that acknowledgement.

Any enquiries related to the text of this publication should be sent to Ofgem at:
10 South Colonnade, Canary Wharf, London, E14 4PU.

This publication is available at www.ofgem.gov.uk. Any enquiries regarding the use and re-use of this information resource should be sent to: psi@nationalarchives.gsi.gov.uk

Contents

Administration of the Boiler Upgrade Scheme decision.....	1
Contents	2
Boiler Upgrade Scheme.....	5
1. Introduction	6
Context and related publications.....	6
Our decision-making process.....	8
Preparations for scheme launch	8
Your feedback	9
General feedback	9
2. Demonstrating eligibility	10
Question 1	
Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.	11
Question 2	
Do you agree or disagree with installers being the party to provide evidence to Ofgem regarding custom-build properties? If you disagree, please say why.	12
Question 3	
Is there any other evidence we should request to prove that properties are custom-build?	14
Question 4	
Do you agree or disagree with the proposed approach to evidencing that a property is not social housing? If you disagree, please say why?	17
Question 5	
Do you agree or disagree with the proposal to use an API to access the information we need from a property's EPC? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	18
Question 6	
Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.....	19
Question 7	
Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?	22
Question 8	

Do you agree or disagree with our proposed approach to evidencing whether a property is connected to the gas grid? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	24
Question 9	
Do you agree or disagree with our proposed approach to evidencing whether properties are in a rural area? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	26
Question 10	
Do you agree or disagree with our classification of parts that can and cannot be used before the heating system is first commissioned? If you disagree, please say why.	28
3. Making applications	31
Question 11	
Do you agree that the 'authorised signatory' for business accounts should be an individual with legal authority to represent the organisation e.g., a Director, Chief Operating Officer, Chief Executive Officer or Company Secretary? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	31
Question 12	
Do you agree or disagree with the proposed sets of user permissions? If you disagree, please provide alternative suggestions, including any evidence, to support your response.	32
Question 13	
Should we collect other information contained on the quote for the purposes of assurance that the property owner has been consulted and reducing speculative applications?	34
Question 14	
Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.	36
Question 15	
Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.	38
Question 16	
Is there any additional information that you think should be included in the boiler upgrade voucher notification?	39
Question 17	
Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.	40
Question 18	

Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.	43
Question 19	
Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?.....	46
4. Audit and compliance.....	48
Question 20	
Do you agree or disagree that installers should be required to inform property owners about the possibility of audits at the application stage and to confirm this to Ofgem? If you disagree, please say why.....	48
Question 21	
Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.	49
Question 22	
Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.	50
5. Appeals – right of review	52
Question 23	
Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.....	52
6. Scheme reporting	54
Question 24	
How frequently would you like Ofgem to publish reports on vouchers issued and available budget? Please provide a frequency and your reasoning behind it.	54
Question 25	
What additional information could be included in the reports? Do you have any suggestions for additional information that could be included in reports, or on the format of the reports?	56
Further comments	58
Appendix 1. List of respondents.....	59

Boiler Upgrade Scheme

The Boiler Upgrade Scheme (BUS) aims to incentivise and increase the deployment of low carbon heating by providing targeted support to the supply chain. Upfront capital grants will be provided to support the installation of heat pumps and, in limited circumstances, biomass boilers in domestic and non-domestic buildings. Grants of £5000 will be available for air source heat pumps (ASHPs) and biomass boilers, and grants of £6000 will be available for ground source heat pumps (GSHPs). Grants will be offered at a flat rate and will not vary by capacity of the installation, which must not exceed 45 kWth.

Microgeneration Certification Scheme (MCS) (or equivalent scheme) certified installers will need to apply to Ofgem for a voucher on behalf of the property owner, who must consent to the application. Vouchers will be valid from the time of issue. Vouchers for ASHPs and biomass boilers will be valid for three months from the time of issue and vouchers for GSHPs will be valid for six months. The installer will need to then apply to Ofgem to redeem the voucher once the installation is complete. Installers will need to submit evidence to demonstrate that eligibility criteria have been met at both stages of the process. Grant payments will be made directly to the installer.

1. Introduction

Context and related publications

1.1. In October 2021, the Department for Business, Energy, and Industrial Strategy (BEIS) issued the 'Future Support for Low Carbon Heat: Boiler Upgrade Scheme' government response. It provided the government response to the Clean Heat Grant section of the 'Future support for low carbon heat' consultation that closed in July 2020, and to the consultation 'Clean Heat Grant: Further policy design proposals', which closed in March 2021.

1.2. The government response changed the name of the Clean Heat Grant to the Boiler Upgrade Scheme (BUS).

1.3. Ofgem ('we', 'us' and 'our' in this document) will be the administrator of the BUS. On 16 December 2021 we published a consultation seeking views on aspects of our proposed administration of the BUS. This document summarises the responses we received and details our final position on the questions we consulted on. Where relevant, we also explain where we were unable to incorporate any suggestions made.

1.4. Within the consultation document we summarised the government position to add context to the aspects we consulted on. The government response referred to above and the BUS regulations should be referred to for further details.

1.5. A list of related publications is detailed below:

- Ofgem: [Consultation on Ofgem's administration of the Boiler Upgrade Scheme](#)
- Ofgem: [Account creation guidance](#)
- BEIS: [Boiler Upgrade Scheme Regulations: approved standards](#)
- BEIS: [Draft Boiler Upgrade Scheme Regulations 2022](#)
- BEIS: [Government response to the Clean Heat Grant proposals \(now known as the Boiler Upgrade Scheme\)](#)
- BEIS: [Future support for low carbon heat consultation](#)
- BEIS: [Clean Heat Grant: further policy design proposals](#)

Our decision-making process

1.6. We received 44 responses to our consultation from a range of stakeholders. Once the consultation closed, all responses were considered, and decisions were made for all the question areas. A list of respondents can be found in Appendix 1, and all responses, except for those that requested to remain confidential, can be viewed on our [website](#).

1.7. This decision document outlines our final position on the aspects of our administration detailed in the consultation. The following chapters consider each consultation area in turn. Each section, relating to a specific consultation question, summarises the stakeholder responses and then sets out our decision.

1.8. In developing our final administrative approach, we carefully considered all the points raised by respondents, even if they are not specifically mentioned in this consultation response.

Preparations for scheme launch

1.9. We continue to work on designing a digital service for the BUS, according to the 14 Government Digital Service (GDS) service standards.² We have been engaging with installers and property owners as part of user research and usability testing.

1.10. For the beginning of the scheme, account creation submissions and then voucher and redemption applications will be made using a form that will need to be submitted to Ofgem via email. However, using an agile approach, we will develop and release further digital functionality as soon as feasible, continuing to further iterate and provide continuous improvement based on user feedback and prioritisation exercises.

1.11. The BUS will open for account creation on 11 April 2022. Installers will be able to create a BUS account and add users with varying permission levels ahead of the scheme opening for grant applications on 23 May 2022. Applications can be submitted from 23 May 2022 for installations that have commissioned from 1st April 2022.

² <https://www.gov.uk/government/organisations/government-digital-service>

Your feedback

General feedback

1.12. We believe that consultation is at the heart of good policy development. We are keen to receive your comments about this report. We'd also like to get your answers to these questions:

1. Do you have any comments about the overall quality of this document?
2. Do you have any comments about its tone and content?
3. Was it easy to read and understand? Or could it have been better written?
4. Are its conclusions balanced?
5. Did it make reasoned recommendations?
6. Any further comments?

Please send any general feedback comments to future.heatpolicy@ofgem.gov.uk

2. Demonstrating eligibility

Section summary

This section covers our proposed administration for the eligibility requirements on BUS and the evidence we will be requiring from installers to make an assessment on voucher applications and redemptions.

Questions

Question 1: Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.

Question 2: Do you agree or disagree with installers being the party to provide evidence to Ofgem regarding custom-build properties? If you disagree, please say why.

Question 3: Is there any other evidence we should request to prove that properties are custom-build?

Question 4: Do you agree or disagree with the proposed approach to evidencing that a property is not social housing? If you disagree, please say why.

Question 5: Do you agree or disagree with the proposal to use an API to access the information we need from a property's EPC? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Question 6: Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.

Question 7: Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?

Question 8: Do you agree or disagree with our proposed approach to evidencing whether a property is connected to the gas grid? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Question 9: Do you agree or disagree with our proposed approach to evidencing whether properties are in a rural area? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Question 10: Do you agree or disagree with our classification of parts that can and cannot be used before the heating system is first commissioned? If you disagree, please say why.

Question 1

Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.

Summary of responses

2.1. We received 37 responses to this question. Twenty-one respondents agreed with the proposed approach. Seven respondents disagreed, eight of the responses were mixed, and one response was unclear.

2.2. Some of those who agreed with the proposal highlighted that installers have the required expertise to identify the existing heating system and can do so during a routine visit to the property. Some respondents also indicated that an EPC provides sufficient evidence for the type of heating system and fuel used in a property when combined with confirmation from an installer. One respondent suggested that Ofgem should verify the heating system when reviewing the application.

2.3. Eight respondents suggested that property owners should be the party to provide evidence of their existing heating system, not the installer. Some highlighted that this could be carried out when the property owner gives consent for the installation, perhaps through an online portal for property owners.

2.4. Six respondents noted that installers will need guidance setting out the evidence that must be requested from the property owner. Five suggested that Ofgem could produce a checklist for installers to use when they gather evidence from property owners.

2.5. It was emphasised by five respondents that the process to confirm that the existing heating system matches that listed on the EPC needs to be quick and simple.

2.6. Several respondents raised concerns about the proposed approach to evidencing existing heating systems. One suggested there is a lack of qualified installers. Others mentioned that additional or alternative evidence that could be provided such as photographs. Some also raised concerns about evidence requirements where the heating system may have already been removed at the time of application.

2.7. Six respondents raised issues with EPCs being used to evidence the previous system. Concerns were raised around the accuracy of EPCs data and whether information on the existing heating system could be demonstrated through an alternative route.

Ofgem response and final administrative approach

2.8. In a change to our consulted-on position, we will not be using EPC data to verify existing heating systems, considering the comments made relating to previous heating system listed, the likelihood that it may no longer reflect the system within the property and that changes could have been made within the 10-year EPC validity that isn't reflected on the EPC. Installers will still need to confirm the previous heating system by selecting the appropriate field when submitting an application. Installers will need to retain all paperwork (see section 2). All installations may be subject to an audit (see section 5).

2.9. We understand in some limited cases, property owners may need to prove to installers that the most recent heating system was a fossil fuel or electric heating system that has been disposed of, such as during a renovation project where the previous heating system is not available for the installer to view. In these cases, installers should satisfy themselves that the previous heating system was eligible to be replaced with the support of a BUS grant. In our guidance, we will provide a non-exhaustive list of evidence types that installers may wish to consider in these cases, which may also be checked during an audit.

2.10. We will assess the eligibility of the installation based on the evidence the installer provides to us. Installers are obligated to notify us if they become aware that information provided in support of the application (or redemption application) was incorrect.

2.11. We will not require installers to submit photographs of existing heating systems to evidence this requirement. However, we do encourage installers to take and retain photographs and evidence for their own records.

Question 2

Do you agree or disagree with installers being the party to provide evidence to Ofgem regarding custom-build properties? If you disagree, please say why.

Summary of responses

2.12. For clarity, what we previously called "custom-builds" will now be referred to as "self-builds" with regards to BUS as this more accurately reflects the legislative requirements for this type of property.

2.13. We received 36 responses to this question, 12 of which agreed with the proposal for installers to be the party to provide evidence to Ofgem regarding self-build properties. Sixteen respondents disagreed, while eight gave mixed responses.

2.14. Of those who agreed with the proposal, three suggested that installers have the technical knowledge to assess and report self-build properties, although two highlighted that property owners will also need to support their assessment with evidence. Two respondents agreed that installers should verify self-build properties given that only a small number of installations are likely to be in self-build properties.

2.15. Of those who disagreed or gave mixed answers, 18 respondents suggested that property owners should be the party to provide evidence to Ofgem regarding self-build properties. Reasons for this included minimising the administrative burden on installers and ensuring that property owners do not have to hand over sensitive or important documents to installers if they are not comfortable doing so. One respondent also highlighted that property owners are making the legal declaration that their property is a self-build, so they should be required to provide the evidence. Similarly, one respondent suggested that the liability for ensuring that the evidence provided is valid should be on the property owner, and this should be made clear when submitting evidence. Another respondent suggested that property owners should provide this evidence in a pre-qualification step prior to approaching an installer.

2.16. It was suggested by three respondents that Ofgem must produce guidance for installers to use to ensure that all the required evidence has been submitted. One suggested that guidance for property owners should also be produced, in a similar approach to the Domestic Renewable Heat Incentive (DRHI) help sheets.

2.17. Three respondents highlighted that the required evidence is often not available until after the heating system is purchased, installed, and commissioned, so alternative evidence may need to be considered. This is discussed in more detail in question 3.

2.18. One respondent questioned whether we need to see evidence at all in relation to self-builds, as there is no single document that will prove this. However, they also suggested that surrounding buildings could be checked to ensure that an alleged self-build is not actually part of a bigger development.

2.19. Another respondent suggested that verification of self-builds should be carried out using an API to access the data on the Planning Portal.

Ofgem response and final administrative approach

2.20. The definition of self-build and the types of properties that are eligible are set in the scheme regulations and outside the scope of this consultation.

2.21. We acknowledge concern expressed by respondents regarding the need for the installer to provide most of the information required to evidence a self-build. However, BUS is an installer-led scheme and as set out by the regulations, installers will be the party making the application to Ofgem. As part of this, we expect installers to satisfy themselves that an application is eligible and provide the relevant evidence where necessary.

2.22. We expect that property owners will assist installers by providing information to evidence a self-build. However, installers, as the applicants, must provide this information to us when applying for a voucher.

2.23. Where property owners have a genuine concern or need to provide this information directly to us, for example bank statements or mortgage documents, we will consider these situations on a case-by-case basis.

2.24. We will publish comprehensive guidance for installers, which will set out the evidence for a self-build that installers may request from the property owner for Ofgem to consider. BEIS will publish guidance targeted at property owners³ that installers should direct consumers to.

Question 3

Is there any other evidence we should request to prove that properties are custom-build?

Summary of responses

2.25. We received 31 responses to this question. Nine respondents did not believe that any other evidence should be requested to prove that properties are self-build. Eighteen

³ [Check if you may be eligible for the Boiler Upgrade Scheme from April 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/check-if-you-may-be-eligible-for-the-boiler-upgrade-scheme-from-april-2022)

respondents disagreed with the current proposals and said other evidence should be requested. Three respondents had mixed views.

2.26. Four of the respondents who agreed with the current proposals highlighted that the proposed requirements are in line with the DRHI, and continuity from the DRHI will help to ease the transition to the BUS. Two respondents stated that the need to provide any additional information would be too onerous, and the process needs to be straightforward to maximise participation in the scheme.

2.27. Seven respondents who disagreed suggested that those whose properties fall under 'self-build' category are unlikely to have the documents mentioned as evidence (council tax bill, VAT reclaim), so alternative documents may need to be accepted. Suggestions for alternatives included:

1. Planning permission or invoices for planning permission
2. Trades and builders' invoices or signed contracts
3. Standard Assessment Procedure (SAP) calculations
4. Architect drawings, invoices, or declaration
5. Geotagged photographic evidence
6. Title deeds
7. Signed contracts with building works
8. Self-build insurance
9. Data checks on nearby homes to make sure self-builds are not actually part of a big development.

2.28. One respondent noted that the address for a self-build may not yet be set, which could make submitting an application difficult.

2.29. One respondent suggested that evidence should not be required, but it should be a tick-box confirmation for installers, similar to our proposal for confirming that a property is not social housing (question 4). Another respondent questioned whether we need to see

documentary proof of self-build given there is no single document that will prove it for all self-builds.

2.30. Five respondents suggested that, instead of evidence, the owner should self-declare that the property is a self-build. Three respondents suggested that Ofgem should produce a self-declaration form for the self-builder or property owner to give to the installer with their address, contact details and the address of the installation that could be cross-referenced with our database of applications.

2.31. Four respondents suggested that the evidence-gathering process needs to be simplified. They suggested that if the evidence-gathering process is too onerous for installers they will need to carry out more site visits and administration, which will drive up prices. These respondents also highlighted the need for clear guidance on property types, like the help sheet produced for DRHI. Separately, there were several queries and concerns around the definition of a self-build.

Ofgem response and final administrative approach

2.32. We recognise that council tax bills and DIY VAT refund receipts may not be available at the point of voucher redemption. We will accept a wider range of information as evidence of a self-build. A list of non-exhaustive acceptable evidence will be set out in the installer guidance we publish.

2.33. We recognise that the address for a self-build may not yet be set at the time of an application. We will provide guidance on how to apply in these circumstances.

2.34. We will require evidence that a property is a self-build for the EPC evidence requirement for insulation to be waived. Firstly, EPCs cannot be generated until the heating system is already in place and this will likely be the case for self-builds with no pre-existing heating system. Additionally, we will be satisfied that a self-build property meets the scheme insulation requirements as any new builds are subject to the current heating and building regulations. Therefore, there is no need for an EPC to evidence compliance with the insulation requirements for self-builds.

2.35. The concerns around the definition of a self-build are not within Ofgem's remit to answer as the definition is set out in the regulations, laid by BEIS.

2.36. We acknowledge the concern that respondents had regarding the need for the installer to provide most of the information required to evidence a self-build. However,

installers are the applicants to the BUS, and we expect them to be satisfied that the details of the application are accurate, and the property and installation is eligible.

2.37. Where property owners have a genuine concern or need to provide this information directly to us, for example bank statements or mortgage documents, we will consider these situations on a case-by-case basis.

Question 4

Do you agree or disagree with the proposed approach to evidencing that a property is not social housing? If you disagree, please say why?

Summary of responses

2.38. We received 36 responses to this question. Fifteen respondents agreed with the proposal that installers must confirm that the property is not social housing. Two respondents mentioned that social housing should be clarified and defined in the installer guidance.

2.39. Seventeen respondents disagreed with the proposal, their main concern being the property owner will know whether a property is being used as social housing or not and that installers should not be held liable for any second-hand information they would have received from property owners, where they would be most likely simply taking the property owners at their word.

2.40. Four respondents were unclear if a declaration was being proposed or not.

Ofgem response and final administrative approach

2.41. We acknowledge concerns raised with the proposal that installers should provide a declaration that the property is not social housing.

2.42. Acknowledging the feedback, alongside installers, we will also require property owners to confirm that the property is not social housing. We will do this when they are asked to confirm whether they consent to an installer making an application on their behalf and we may audit this requirement.

2.43. However, our position remains that as an installer should be satisfied that the application being made is accurate and eligible and they will be required to declare whether the property is social housing.

2.44. We will ensure our installer guidance is clear on what social housing is as defined in the BUS regulations.

Question 5

Do you agree or disagree with the proposal to use an API⁴ to access the information we need from a property's EPC? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Summary of responses

2.45. We received 36 responses to this question. Nineteen respondents agreed with the proposal to use an API to access the necessary information from a property's EPC. Sixteen respondents gave mixed answers to this question and one response was unclear as to whether the respondent agreed or disagreed. No respondents disagreed with the proposal. However, there were comments on the suitability of EPCs to evidence the presence of insulation. This included seven respondents who suggested that there were inconsistencies between EPCs that had been issued.

2.46. Eight respondents highlighted the possibility that a property may have undergone changes to its insulation, but the EPC may not have been updated to reflect this. They suggested additional ways for installers to evidence that the EPC is not up to date should be considered. One other suggestion noted that new EPCs should be able to be generated (in line with our proposed administration) for it to reflect the current circumstances of the property.

2.47. The consultation outlined the proposed process for instances where there are outstanding recommendations for loft and cavity wall insulation on the EPC at voucher application. Two respondents suggested that responsibility for ensuring this is achieved (ie that the insulation is installed and evidenced by the time of voucher redemption) falls on the property owner. They commented that it would be burdensome and unfair to ask the installer to declare the intention to install the insulation, in addition to the property owner.

⁴ API stands for application programming interface, which is a set of definitions and protocols for building and integrating application software

2.48. The need for our guidance to describe what installers should do for properties that have no current EPC was highlighted. The fact that not all properties currently have an EPC led some to question why they are a necessary element to the scheme design.

Ofgem response and final administrative approach

2.49. Once an installer submits an application, we will check the property details against the government's EPC register⁵ to check aspects of eligibility using information on the most recent valid EPC. We intend to automate this process subject to ongoing assessment of feasibility. An EPC is not required to be submitted in relation to self-build properties as we outlined in the response to question 3.

2.50. Vouchers can be issued to properties that have loft or cavity wall insulation requirements, or both. The installer and property owner must both confirm the intention to install the necessary insulation and when complete, arrange for a new EPC to be generated which confirms that the required insulation is now in place. This must be completed ahead of the voucher redemption application.

2.51. Upon receipt of a voucher redemption application, we will verify against the latest EPC data available for the property. Where there are loft or cavity wall insulation requirements listed, the redemption application will not be successful, and we will not issue payment.

2.52. The BUS regulations only allow for properties with no loft or cavity wall insulation recommendations on the most recent EPC to be accepted as evidence, we are unable to accept any other form of evidence of the insulation requirements being met. The regulations specify that Ofgem are required to accept an EPC at face value. Therefore, where there are recommendations or data issues, a new EPC will need to be generated and provided at redemption to be eligible to receive payment.

Question 6

Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.

⁵ <https://www.gov.uk/find-energy-certificate>

Summary of responses

2.53. We received 36 responses to this question. Eighteen agreed with the approach we outlined. Ten respondents disagreed and eight had mixed views.

2.54. The primary concerns raised by the respondents related to BEIS' insulation requirement policy, rather than our proposed administrative approach. Seven respondents highlighted a risk to installers that if insulation was required but not installed before they installed a heat pump, installers would not be able to successfully redeem the voucher. Six of those respondents went on to suggest that responsibility for installing the insulation should reside solely with the property owner and any delay should not result in non-payment of the grant to the installer.

2.55. One respondent stated that the Seasonal Coefficient of Performance (SCOP) and normal heat loss calculations required for heat pump installation should be sufficient without reference to EPCs.

2.56. One respondent stated that an architect should be another suitable person allowed to make an assessment as to whether a property's structure was unsuitable for insulation. Another believed evidence provided by an installer accredited to install insulation should also be considered acceptable.

2.57. One respondent stated that, to allow for a quicker application process, property owners should be able to self-certify that insulation exemptions apply. They noted that this would guard against insulation installers profiteering from, and overselling, insulation to property owners. They further stated that the risk of property owners fraudulently claiming exemption could be mitigated with clear guidance and the possibility of audits.

2.58. One respondent disagreed with the approach on the basis that the named bodies in the proposal would need more funding from government to accommodate the extra workload implied by their naming in the BUS regulations.

2.59. One respondent stated we had not mirrored the DRHI approach. They pointed out that the approach omitted an exemption that applies on the DRHI scheme when insulation is judged by a RICS Chartered Surveyor as being unsuitable due to local environmental conditions such as regular exposure to driving rain.

Ofgem response and final administrative approach

2.60. Where a property is exempt from the insulation requirements due to local environmental conditions, we will accept evidence of this from a chartered ecologist or chartered surveyor.

2.61. It is not within our remit to add qualified architects, insulation installers, or property owners to the list of suitable people to evidence insulation requirement exemptions as this matter is expressly provided for within the regulations, which have been laid before parliament by BEIS.

2.62. Evidence that a property is exempt from the insulation requirements will need to be submitted by the installer at the voucher application stage. Ofgem will provide templates for this.

2.63. The insulation requirements are set out in the BUS regulations, and we cannot make payments for installations in properties that are ineligible.

2.64. Additionally, MCS standards require installers to carry out an assessment of the insulation needs of a property when installing a heat pump, therefore installers should have knowledge of the state of insulation of a property, regardless of verbal information given to them by the property owner.

2.65. We recognise that a recommendation for the installation of insulation requires action from a property owner, and that this will impact on the successful redemption of a voucher issued with such additional conditions. We will therefore proceed with our proposal to require a declaration from both the installer and property owner confirming that they understand the need for installing the insulation during the voucher validity period, and the consequences (ie not being eligible to receive payment) of not doing so.

2.66. Installers can adjust the timing of when they apply for a grant to increase the likelihood that suitable insulation will be present at the time of voucher redemption. If the voucher validity period ends and the required insulation has not been installed, installers may re-apply to the scheme for the same installation as indicated in paragraph 3.33 of our consultation. They can also choose to apply to the scheme after insulation has been installed.

Question 7

Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?

Summary of responses

2.67. We received 32 responses to this question. There was confusion among respondents as to whether the proposal related to evidencing the eligibility of an individual installation or determining the eligibility of a particular brand or model of low carbon heating system and/or relating to whether it is on the Product Eligibility List (PEL).

2.68. Respondents suggested that guidance is needed to clarify that the 45 kWth limit is 'per system'. Clarity was requested on the meaning of 'full heating of the property' in relation to swimming pools, heating of extensions and annexes, and if eligibility is based on one voucher per individual or one voucher per property.

2.69. Clarification was also requested on how MCS certified umbrella scheme installers will be treated in relation to non-MCS certified subcontractors.

2.70. Twelve respondents suggested that we should consider other evidence when determining the eligibility of a heating system. Eight of these appeared to refer to the eligibility of specific installations. Four responses appeared to disagree with the proposals on evidencing the eligibility of particular models of low carbon heating system.

2.71. Four respondents had mixed views, one of which related to the eligibility of specific installations, and three of which appeared to relate to the eligibility of particular models of low carbon heating system.

2.72. Two respondents raised issues surrounding Seasonal Coefficient Of Performance (SCOP) values.

2.73. Another respondent highlighted that installers are not a neutral party for reporting whether a system meets the total heating and hot water needs of a property and suggested that Ofgem carry out random inspections to ensure that all installations are compliant.

2.74. One respondent suggested that, with regards to biomass boilers, the definition of rural is not sufficient. They suggested that it should be lowered to populations of 5000 or below,

or an air quality measure should be used instead, as areas with small populations do not necessarily have better air quality than urban areas.

Ofgem response and final administrative approach

2.75. The eligibility requirements are set out in the regulations, so we do not have discretion over them. We have set out the requirements, provided additional clarifications and the evidence we intend to consider for each requirement below following responses we received during our consultation.

Table 1 - Technology eligibility requirements and evidence

Eligibility requirement	Evidence Ofgem intend to consider
<p>The maximum allowed capacity for a heat pump or biomass boiler will be 45 kWth.</p> <p>The overall system capacity for shared ground loop systems will also be capped at 45 kWth.</p> <p>This means that if several heat pumps are connected to one shared ground loop, the total capacity of those heat pumps combined may not exceed 45 kWth.</p>	MCS certificate (Total Installed Capacity).
The commissioning date for all systems must be on or after 1 April 2022.	MCS certificate (Commissioning Date).
Systems must meet the full heating and hot water requirements of the property.	MCS certificate and confirmation from the installer at the application redemption stage.
<p>Heat pumps and biomass boilers must meet approved standards which must be valid on the commissioning date. Approved standards mean standards that are approved and published by the Secretary of State.</p> <p>The approved standards for scheme launch have been published by BEIS on the GOV.UK website.</p>	<p>The BUS Product Eligibility List (PEL).</p> <p>The PEL will list the eligible products for the scheme and this list will be updated regularly.</p> <p>The product on the MCS certificate supplied by the installer at voucher redemption will be checked against the PEL for eligibility.</p>

Installations must be new and not second-hand. No part of the low carbon heating system which generates heat must be used before the low carbon heating system's first commissioning date, other than supplementary electric heaters (including immersion heaters), circulation pumps, and solar thermal collectors.	Installers will need to confirm compliance with this requirement at application. We will also check this information against the MCS installation database (MID), as installers will need to declare condition as part of MCS standards.

2.76. Once installers are fully MCS certified, they can apply for any of the installations they have completed which fulfil the BUS eligibility criteria. It is our understanding that interim MCS numbers are not contained on MCS commissioning certificates. MCS commissioning certificates are only issued to fully MCS certified installers.

2.77. To clarify the position regarding non-MCS sub-contractors, installers that create BUS accounts, submit voucher applications and redemption applications must be MCS certified. Those installers can carry out installation work through sub-contracting non-MCS companies, as per MCS rules.

Question 8

Do you agree or disagree with our proposed approach to evidencing whether a property is connected to the gas grid? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Summary of responses

2.78. We received 30 responses to this question. Twenty-three agreed that installers should be required to submit a declaration during their application that the property is not connected to the gas grid. Four respondents disagreed with the proposed approach, and two responses were mixed.

2.79. Two respondents mistakenly believed that biomass applications would be prioritised, or that heat pumps would not be supported where the property is not connected to the gas grid and provided mixed responses on that basis.

2.80. There was a view from some respondents that the evidence burden placed on installers should be minimised as far as possible, and six respondents stated that the declaration and check should be as simple as a tick box on the application completed by the installer.

2.81. Five respondents suggested that a more robust approach to checking if a property is off the gas grid should be taken. Suggestions included using the Gas Safe Register to assess gas grid connections or using data from the non-gas map. One respondent stated that installers should be provided with access to a database of off-gas grid properties so they could be more confident in making declarations. Another respondent suggested using the EPC to verify if gas has ever been used at the property indicating a current or past connection to the gas grid.

2.82. The four respondents that disagreed stated that the off-gas grid evidence should be provided by the property owner, not the installer.

Ofgem response and final administrative approach

Table 2: Gas Grid requirements

Eligibility requirement	Evidence Ofgem intend to consider
Biomass boilers will only be an eligible technology for properties that are not connected to the gas grid. This limitation also extends to properties that are connected to the grid but have a clamped or capped-off gas supply.	In our consultation we said that installers would confirm the gas grid status of a property through a declaration. In response to user feedback, we have changed this to the gas grid status being a question on the application form instead.
Properties both on and off the gas grid will be eligible for heat pumps.	<p>This means that all applications, either for heat pumps or biomass boilers, will be required to confirm whether a property is on or off the gas grid. The eligibility requirements remain unchanged.</p> <p>Ofgem will be checking against this publicly available data to verify eligibility for biomass boiler installations and whether a property may be on the gas grid or not.</p> <p>Installers should check as to whether the property has (or had) a gas connection when evaluating the</p>

	<p>property for the installation e.g. replacing a gas boiler indicates a gas connection.</p> <p>Installers can also check postcodes against publicly available resources to check as to whether a property is connected to the gas grid prior to submission of an application. Both methods can provide installers with confidence in their confirmation and mean they will not need to solely rely on the property owner.</p>
--	--

Question 9

Do you agree or disagree with our proposed approach to evidencing whether properties are in a rural area? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Summary of responses

2.83. We received 29 responses to this question. Nineteen agreed with our proposal to use the Office for National Statistics (ONS) tool⁶ to check whether a property relating to a biomass boiler application is in a rural area. Four people disagreed and in three responses it was unclear whether they agreed or disagreed with the proposal.

2.84. Those who agreed thought the use of the ONS tool was appropriate, but that we should provide a way for installers to use the tool and check the property is likely to be eligible before they apply for a biomass boiler grant.

2.85. Respondents across the board were clear that the definition of rural that we rely on should be clearly set out and available to installers to check against.

2.86. Three respondents felt that we did not provide enough information on the definition we will use for rural areas. Respondents noted that if this definition is not clear then there

⁶ [Open Geography Portal \(statistics.gov.uk\)](https://statistics.gov.uk)

could be confusion over what constitutes a rural area. In some cases, for example large villages, the rural/urban classification will not be immediately obvious.

2.87. Two respondents who disagreed stated that the installer should provide a declaration as to whether the property is in a rural area. A further two respondents stated that the ONS rural/urban definition does not consider other factors relevant to air pollution, such as population density. They suggested that biomass boilers should only be permitted in areas with a smaller population, such as fewer than 5,000 people, if we intend to use population to measure rural viability. These respondents also suggested that eligibility should be directly related to air quality impact, rather than using population numbers to estimate this.

Ofgem response and final administrative approach

Table 3: Rural area requirements for biomass boilers

Eligibility requirement	Evidence Ofgem intend to consider
Only existing properties in rural areas will be eligible for a biomass boiler.	There will be no requirement on installers to evidence the property being located in a rural area.
The BUS regulations use the ONS definition of a rural area. A rural area is located outside of settlements with a population of 10,000 people or more.	<p>We will use the ONS Rural-Urban Classification tool to verify if a property is located in a rural area, using the installation address given to us at voucher application for biomass boiler applications.</p> <p>Installers may wish to assure themselves that a property is in a rural area by using the ONS Postcode Directory, which can be found under the 'Postcodes' section of the navigation bar on the ONS Open Geography Portal: Open Geography Portal (statistics.gov.uk). Installers can download the latest available dataset, find the relevant postcode, and read off the corresponding value in the 'ru11ind' column.</p> <p>Installers can also check if a property is classified as rural or urban by entering the</p>

	<p>postcode at this link and reading off the 'RU11IND' value: Rural-Urban Classification for Output Areas Locator Tool (arcgis.com).</p> <p>The ONS regularly updates the ONS Postcode Directory, and we will use the latest available release for our checks.</p>
--	--

Question 10

Do you agree or disagree with our classification of parts that can and cannot be used before the heating system is first commissioned? If you disagree, please say why.

Summary of responses

2.88. We received 34 responses to this question. Twenty-seven respondents agreed with the proposed classification of parts that can and cannot be used before the heating system is first commissioned. Four of these respondents noted the proposal was in line with the requirements of MCS 001, the MCS Contractor Standard, which specifies that "products and materials installed shall be new and not previously used".⁷

2.89. Five respondents had a mixed or unclear response. Of these, three agreed with our proposal and sought clarification on the definitions of the relevant parts proposed. Two of these neither agreed nor disagreed with our proposal but noted it was unclear in places, for example on the treatment of boreholes.

2.90. Of the two respondents that disagreed, one was concerned about installations that miss the DRHI application deadline not being eligible for the BUS, and the other stated they would like to see the inclusion of solar photovoltaic parts in the list of relevant parts.

⁷ [The MCS Contractor Standard – Part 1: Requirements for MCS Contractors](#)

Ofgem response and final administrative approach

2.91. We will proceed with our proposed list of parts that can and cannot have been used before the first commissioning date of the heating system.

2.92. Parts in Table 4 that can have been used before the first commissioning date of the heating system can include those already existing at the property or those installed at the same time or shortly before the newly installed system.

2.93. 'Commissioning' occurs when the installer has tested and signed off on the installed low carbon heating system. A low carbon heating system is commissioned upon the completion of procedures and tests undertaken to the usual industry standards and practices for the specific type of system which demonstrate that the system is capable of operating and generating heat. In practice, we will look at the commissioning date given in the MCS certificate for confirmation of the commissioning date.

Table 4 - Parts that can and cannot be used before the heating system is first commissioned

Heating system type	Heat generating parts that cannot have been used before first commissioning date of the heating system	Heat generating parts that can have been used before the first commissioning date of the heating system	Other parts that can have been used before first commissioning date of the heating system
Air Source Heat Pump	Heat pump unit and compressor	Immersion heaters for domestic hot water Supplementary electric heaters Circulation pumps Solar thermal collectors	Container and fixings Pipes Emitters Hot water cylinders Buffer tanks or thermal stores Expansion vessels Controls
Biomass boiler	Boiler	Immersion heaters for hot water Supplementary electric heaters Circulation pumps	Fuel storage, preparation, or delivery equipment Fixings Controls

		Solar thermal collectors	Emitters (e.g., radiators) Hot water cylinders Pipes Buffer tanks or thermal stores Expansion vessels
Ground (or water) source heat pump	Ground or water loop ⁸ Heat pump unit and compressor	Immersion heaters for domestic hot water Supplementary electric heaters Circulation pumps Solar thermal collectors	Container and fixings Pipes Emitters Hot water cylinders Buffer tanks or thermal stores Expansion vessels Controls

⁸ The installation of a second or subsequent ground source heat pump as part of an existing shared ground loop system is allowed

3. Making applications

Section summary

This section covers our proposed administration around applications and redemptions for vouchers. It covers our proposals around creating an account, property owner consent, making applications and payments.

Question 11

Do you agree that the 'authorised signatory' for business accounts should be an individual with legal authority to represent the organisation e.g., a Director, Chief Operating Officer, Chief Executive Officer or Company Secretary? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Summary of responses

3.1. We received 35 responses to this question. Thirty-two respondents agreed with our proposal, one person disagreed and there were two mixed responses.

3.2. Many of those who agreed, as well as those with mixed responses, stated that clear provision must be made for how to recognise authorised signatories where company directors or other individuals with legal authority to represent the organisation are not listed on Companies House.

3.3. The person who disagreed considered our list of examples of authorised signatories to be incomplete and said it should include someone with a financial role in the company.

Ofgem response and final administrative approach

3.4. In our consultation, we referred to 'authorised signatories'. Based on feedback from user research, we are now calling this type of user an 'authorised representative'.

3.5. An 'authorised representative' must be the initial user and set up the account for a company (where applicable). They will do this through sending us the relevant form at any time from 11 April 2022. Those applying to be an 'authorised representative' will be required to verify their identity as part of the account set up, including providing photo ID.

3.6. For installers that are companies, the authorised representative will need to be a named official on Companies House. We will verify the identity of a company's 'authorised representative' by cross-checking with information registered with Companies House.

3.7. Given the 'authorised representative' will be a named official, a 'letter of authorisation' will not be required. The 'authorised representative' will take initial responsibility for identifying any additional users required. They will allocate the relevant user permissions to other individuals in the organisation and will acknowledge that their business will take responsibility for the activity undertaken by those individuals. Further user management may be undertaken by those with the relevant permissions at a later date, after the account has been initially created.

3.8. Businesses, such as those run by sole traders, that do not appear on Companies House records will be able to indicate this and will be subject to identity checks which shall be set out in guidance.

Question 12

Do you agree or disagree with the proposed sets of user permissions? If you disagree, please provide alternative suggestions, including any evidence, to support your response.

Summary of responses

3.9. We received 32 responses to this question and all of them agreed with the proposed set of user permissions.

3.10. Where further comments were provided, respondents were content that the authorised signatory retained overall responsibility for the account and could provide other users with all the same permissions they have.

Ofgem response and final administrative approach

3.11. For installers that are companies, we will have three levels of user permissions available, as described in Table 5. Once the account is created by an authorised representative for the organisation, they will have all available permissions by default: authorised representative, standard user permissions, user management permissions.

3.12. In a slight amendment to the consultation position, the authorised representative will be the only individual to have account management permissions. They will be the only individual able to edit company details such as company name, MCS certification number and bank account details. This is to add additional security on the account and to protect business. This decision makes company accounts more secure, and we do not expect these details to regularly change so don't anticipate significant additional workloads for authorised representative.

3.13. The authorised representative will be able to add and remove other users to the account and provide them with the appropriate level of permissions. The additional permissions levels will be "standard user" and "user management". The authorised representative will need to confirm that they will take responsibility for the activity undertaken by those individuals.

3.14. The user permissions are not as relevant for sole traders as they will be the sole user on their account and as such will have all the user permissions – as if they were an authorised representative of a company.

3.15. Additional information on accounts can be found in [guidance](#)

Table 5 - Permission levels

Permission	Description
Account management (Only for authorised representative)	<p>Ability to:</p> <ul style="list-style-type: none">• Create an account• Update key information about the company such as bank details, MCS certification number, business address etc.• Add additional users to the account <p>They will also have all the permissions that apply to the other user types.</p>
User management	<p>Ability to:</p> <ul style="list-style-type: none">• Add additional users to the account

	<ul style="list-style-type: none">• Set and update permission levels for users (other than the authorised representative)• Remove users from the account (other than the authorised representative) <p>They will also have all the permissions that apply to the standard users.</p>
Standard user	<p>Ability to:</p> <ul style="list-style-type: none">• Submit new voucher applications• Edit and manage existing applications• Redeem or cancel issued vouchers• Re-apply for applications where a voucher may have expired

Question 13

Should we collect other information contained on the quote for the purposes of assurance that the property owner has been consulted and reducing speculative applications?

Summary of responses

3.16. We received 36 responses to this question. Fifteen respondents stated that we should not ask for any additional information from the quote beyond that set out in our consultation.

3.17. Three individuals responded affirmatively but did not specify the additional information that should be included.

3.18. A further three respondents suggested that the full MCS quote data should be requested to provide assurance against speculative applications. Similarly, one respondent suggested a Heat Pump Seasonal Performance Estimate should be submitted for the same purpose.

3.19. One respondent suggested that a follow-up phone call to the property owner should be used to verify the details of the quote but acknowledged the resource implications on Ofgem.

3.20. Two respondents stated that the quote data should be final quote data and that provisional data should not be permitted.

3.21. Eight respondents disagreed with the need for quote data altogether, claiming that a checklist verified by property owners would save some duplicated effort for installers while guarding against speculative applications.

Ofgem response and final administrative approach

3.22. The BUS regulations require quote details to be provided by installers as part of the application process. The information from the quote that we will require includes:

- The total quote amount, including VAT, before the grant is deducted.
- The total cost of the heat pump or biomass boiler charged to the property owner, including VAT⁹.
- The quote reference number, which will be the installer's internal reference for the quote.
- The date the quote was issued.

3.23. We will retain the flexibility for quote details to be either final or provisional. We recognise that costs may change over a project lifetime. Installers will not need to update Ofgem with changes in project costs that occur after quote details are submitted to us. Installers must retain a copy of any information relied on when making grant applications and redemption applications for six years from the date on which they were made. This includes the quote details submitted as part of an application.

3.24. We will not conduct any of the additional suggested checks against speculative applications, such as collecting MCS quote data or Seasonal Heat Pump Estimates due to the resulting administrative burden that would be put on both installers and Ofgem.

3.25. In addition to what was set out in the consultation, we will ask for the cost of the heat pump or biomass boiler that the property owner will pay to be submitted, as reflected in the bullet point above.

Question 14

Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

⁹ Expected to be £0

Summary of responses

3.26. We received 35 responses to this question. Twenty respondents agreed with the proposed approach to obtaining evidence of property owner consent.

3.27. Eight respondents disagreed with the proposal. Four respondents stated that information we proposed should be provided by installers to Ofgem about property owners should actually be provided by the property owners themselves and not the installer.

3.28. One respondent stated that the process should be like the DRHI, with a five-step process. The process being the installer logs onto the BUS portal to make an application, the property owner then gives consent, the installer then completes the installation and completes the redemption. The property owner then declares they are happy with the work and in the end the grant is issued to the installer. One other respondent that disagreed with the proposal stated that the signed consent form should be included in the application. A further respondent stated that the process to obtain property owner consent will add administrative burden to installers. Lastly, one respondent suggested that there could be a document outlining the decisions made by the installer and property owner, which is co-signed by both parties, and that this could be provided on an app.

3.29. Six respondents provided mixed responses to the proposed approach. Two respondents agreed with the proposed approach but suggested that there should be a route to gain consent for those who cannot easily access online services. Three respondents stated that the property owner should provide their contact details directly to Ofgem through an online portal.

3.30. One respondent was concerned about fraudulent selling and suggested that property owners should be provided with itemised bills.

Ofgem response and final administrative approach

3.31. The BUS Regulations require installers to provide us with contact details for property owners. We will use the contact details of the property owner to confirm they have given consent for the installer to make the BUS application, as set out in the regulations. Property owners will confirm their consent directly with us and we are planning of this to be completed on our digital service. We will also use the information provided to verify the identity of property owner using a 3rd party verification provider. In some instances we may need to request further supporting information.

3.32. Property owners will also be required to confirm some details about their eligibility, including whether the property is social housing. They will also confirm that they have not received a grant from public funds for any of the costs of the purchase or installation of the heat pump or biomass boiler, or the installation was not funded through the Energy Company Obligation scheme. Property owners may be contacted by Ofgem for audit purposes.

3.33. We recognise that some property owners may not be able to access the online service to provide their consent. We are exploring options for assisted digital support. If the installer is unable to provide an email address for the property owner, we will contact the property owner via an alternative channel and assess their needs. If they require assisted digital support, we can assist them with the consent journey offline.

Question 15

Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.

Summary of responses

3.34. We received 37 responses to this question. Eleven respondents agreed with the seven-day proposal. One response sought clarification on whether seven days refers to seven working days or seven calendar days.

3.35. Twenty respondents disagreed with the proposal with 12 respondents stating that seven days is not sufficient time to gain consent from property owners. Many respondents thought 14 days to gain consent was more appropriate. Two respondents recommended 28-30 days.

3.36. Three respondents that disagreed with the proposal suggested that consent could be collected when an installer goes to the property to assess its suitability. They suggested that this would help to streamline the process.

3.37. Four respondents provided mixed responses. One respondent mentioned an alternative route should be provided if the online route is not viable. Two respondents queried if extensions to the seven-day period would be available, or if the application would remain open on the system if property owner consent was not received, so that applications wouldn't need to be resubmitted.

Ofgem response and final administrative approach

3.38. We have taken into account the feedback provided and have decided to change the period for property owners to provide consent to 14 days.

3.39. The process to gain consent and provide the information will remain the same as set out in our consultation and in question 14.

3.40. Where the 14-day window is exceeded, the application will expire, and a new application must be made.

3.41. The property owner will only be able to consent to one application per property. If they consent to one installer's application in relation to a property, any other applications relating to the property will be rejected. For cases, where property owner consent is given in error or fraudulently, we will retain the ability to edit the details of property owner consent and may need to contact the property owner and/or installer.

Question 16

Is there any additional information that you think should be included in the boiler upgrade voucher notification?

Summary of responses

3.42. We received 30 responses to this question. Four respondents provided some detail about additional information that should be included in the BUS voucher notification. Fourteen respondents stated that no additional information was required. The remaining responses provided feedback on BEIS policy decisions and other information installers wanted to be aware of including need for installers to have visibility of available budget, the overall budget of the scheme, voucher validity periods, and queues.

3.43. Suggestions as to what extra information could be provided with the voucher notification included: reference to whether the property is a self-build, minimum standards for insulation, approved supplier companies, itemised bills, and permitted maximum capacity.

Ofgem response and final administrative approach

3.44. If a voucher application is successful, we will issue a notification to the installer and property owner that includes the following information:

- Voucher issue date,
- voucher expiry date,
- unique voucher ID
- Type of heating system applied for (ASHP, GSHP, biomass boiler),
- the property address,
- the installer to which the voucher relates
- Name, address, email address, and telephone number of the property owner to which the voucher relates
- Value of the grant that will be paid to the installer following successful redemption of the voucher
- Where the property does not meet the insulation requirements at the application stage, and a declaration has been provided that insulation requirements will be met ahead of the redemption application, an additional condition will be added that a new EPC with no relevant insulation recommendations must be evidenced when the voucher is redeemed.

3.45. We will not include the suggestions for additional information that were put forward in the consultation responses. Full eligibility requirements will be set out in the installer guidance, and we would expect installers to consider any redemption eligibility requirements before submitting a voucher application.

3.46. We have further set out how budget availability and queues will operate and be managed in our response to question 25.

Question 17

Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.

Summary of responses

3.47. We received 36 responses to this question. Nine agreed with our proposed approach to issuing vouchers, nine disagreed, there were 17 mixed responses, and one unclear response that we could not categorise.

3.48. Two respondents requested clarity on the process for property owners that miss out on the DRHI. Eight respondents urged for lessons to be learned from the Green Homes Grant (GHG) Voucher Scheme and some mentioned that it had badly damaged installer confidence in similar government schemes. Some of the suggested improvements over the GHG scheme included that the administrative requirements of the BUS should be lower, a guarantee of quick payments, and that guidance on evidence requirements should be produced. Four stated that voucher validity periods should be extended but recognised this was not within Ofgem's control since these are set by BEIS.

3.49. Six respondents stated that the process of issuing a voucher must be simple and efficient to instil confidence in the BUS.

3.50. Two respondents commented on queueing, and while they supported the idea, they were clear that any upcoming budget caps likely to result in a queue must be communicated to installers clearly. They further requested that we clarify when an application would enter a queue.

3.51. Two respondents stated that we should consider sending reminders to those holding valid vouchers to ensure they are being used and to avoid dormant applications. A further two respondents stated that they would prefer if extensions were provided instead of installers having to reapply for a new voucher. Two respondents felt that the reapplication process must be simple and not require evidence to be resubmitted.

3.52. Finally, four respondents argued that we should put in place service level agreements (SLAs) for assessing applications and redemptions. These respondents noted that SLAs are in place for installers to submit information, but no similar requirement is placed on Ofgem to take actions within a certain timeframe.

Ofgem response and final administrative approach

3.53. An application will only be considered '*properly made*' when we have received property owner consent and all the information required to assess the eligibility of an application (as set out in chapter 2 and within the regulations).

3.54. Once a properly made application has been assessed and we are satisfied that all the eligibility requirements have been met, we will issue a BUS voucher where there is available budget.

Expired vouchers

3.55. If a redemption application is not submitted during the voucher validity period, the voucher will expire and the budget that had been allocated to that voucher will be returned, where possible, to the overall remaining budget. Extensions to the voucher validity periods will not be allowed, however installers will be able to resubmit an application where they were unable to commission in time (or apply retrospectively).

3.56. Where vouchers are revoked during the validity period, the value associated with revoked vouchers will also be returned to the overall remaining budget. For more information on revoking vouchers see Question 23.

3.57. Once we receive a resubmission, we will then re-verify the property owner consent and once this is received, the application will be considered properly made and re-enter at the back of the queue and not regain their previous position.

Budget allocations and queues

3.58. The annual budget allocation is £150m. As provided for in the BUS regulations, the Secretary of State has the power to introduce a quarterly budget allocation. If a quarterly budget allocation is to come into force, the Secretary of State will publish this before the start of the relevant quarter. This means we may be limited in the number of vouchers we can issue per quarter. There will not be a quarterly budget allocation in place when the scheme opens for applications and redemptions on 23 May 2022.

3.59. Applications will be provisionally allocated budget in the order in which they become properly made.

3.60. We are not able to issue a voucher where issuing it will take the budget over the budget allocation published by the Secretary of State for that financial year or quarter. This ensures that if a voucher is issued, payment will be available at redemption subject to the eligibility conditions being met. If a budget allocation limit is met, we may operate an application queue.

3.61. We will make data available on a monthly basis at the start of the scheme, to allow installers to stay informed of the remaining available budget within the budget allocation period and the likelihood of a queue forming. Going forward, we aim to increase this frequency as feasibility allows. This can be found in our response to question 25.

3.62. Where a budget allocation limit is met, new properly made voucher applications will not be automatically rejected, instead they will enter a queue. We will work through any queued applications in order of date of being properly made, starting with the oldest.

SLAs

3.63. We will not be setting out a maximum processing time for voucher applications or redemptions. However, we will always look to process applications in an efficient and timely manner, where possible. If we need to query applications or ask for more information, this will slow down the process. We would therefore encourage applicants to ensure that all necessary information and evidence is submitted up front and that applications are of a high quality.

Question 18

Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.

Summary of responses

3.64. We received 35 responses to this question. Thirteen respondents agreed with our proposed approach to administering applications for voucher redemption. Seven respondents disagreed with the proposal, 14 had mixed views and one response was unclear.

3.65. Six respondents suggested that property owners should be responsible for gathering or submitting evidence. Five of those respondents suggested that we should produce a self-declaration form which the property owner should sign and provide to the installer. The installer could then confirm on the same form that the information provided is correct, following a site visit.

3.66. One respondent suggested that the 2-step application and redemption process add too much of an administrative burden to installers, and the BUS process should mirror the DRHI process. However, they incorrectly characterised the DRHI process as the full application being completed in advance of the installation.

3.67. Three respondents supported the use of APIs generally, to reduce the information that installers need to provide in order to reduce the administrative burden on installers.

3.68. Three respondents highlighted concerns around the documents required by us during the application and redemption processes. They suggested that the EPC certificate and the MCS certificate should be cross-referenced, and that an emissions certificate should not be necessary in addition to an MCS certificate.

3.69. Another respondent suggested that installers should be able to provide updates to the current EPC certificate by providing evidence, given that providing a new EPC adds time and cost to the process.

3.70. Four respondents raised concerns and questions surrounding voucher validity periods. One respondent suggested that the current validity periods are too short and will negatively affect installer confidence. They suggested that vouchers should be able to be redeemed at any time.

3.71. Another respondent highlighted that the voucher validity periods may be too short to allow self-builds to obtain an EPC in time for redemption. They suggest that Standard Assessment Procedure (SAP) reports could be used at redemption instead of an EPC.

3.72. One respondent queried whether applicants need to reapply if the voucher expires while waiting for their redemption application to be approved. Another respondent questioned whether there is recourse for property owners if a redemption application is declined after the voucher was initially approved. One respondent requested clarification on the queueing system that Ofgem may implement if demand for vouchers outstrips supply.

3.73. Five respondents shared concerns in relation to the processing times of payments. Three suggested that there should be an SLA for Ofgem processing times, as there are deadlines for installers to provide information. One respondent suggested that the processing of a redemption application must take no more than 5 working days, with the payment then being added to the next weekly cycle.

3.74. One respondent suggested that there should be a fast-track system for property owners who are applying to the scheme because their boiler has broken down, and therefore need a quick installation.

3.75. Another respondent highlighted that Ofgem needs to be suitably staffed and trained in order to avoid delays to the processing of applications or payments.

3.76. Three respondents had concerns around fraud. Two respondents suggested that the property owner should be asked for consent at the redemption stage to verify the information provided by the installer and to help prevent fraudulent redemption of the voucher.

Ofgem response and final administrative approach

3.77. The eligibility criteria, validity periods and two-stage application process are set out in the scheme regulations.

3.78. The expiry date on a voucher refers to the date by which a properly made voucher redemption application must be submitted. A redemption application will only be considered properly made once we have received all the evidence required to assess the eligibility of the application. Once a properly made redemption application has been submitted, it won't be affected if the expiry date passes before, we have approved it.

3.79. We will put in place processes to allow us to process redemption applications efficiently and will always endeavour to do this in a timely manner, enabling us to make payments promptly where appropriate.

3.80. If we need more information from an installer, we will notify them of this need and the required deadline for that additional information or clarification. We will send messages to remind installers of this deadline when required.

3.81. Ofgem do not have the ability to fast track application as the BUS regulations set out a two-stage application process that require us to process applications as they are received.

3.82. We are looking to streamline the process for applications where installations are commissioned between 1st April 2022 and 23rd May 2022. A voucher application may be submitted retrospectively, i.e., after the installation is commissioned, and the redemption application may then be submitted as soon as the voucher is received.

3.83. The evidence we will be considering at the redemption stage alongside the standards MCS installers must adhere to, should act as deterrents against fraud (ie MCS certificate and EPCs where applicable). Additional confirmation of the property owner having consented to an application being made would also add time between a redemption application and grant payment being made. Prompt processing times have been stressed as crucial to installers. Therefore, we will not be adding an additional requirement for property owners to provide consent to a redemption application being made.

Question 19

Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?

Summary of responses

3.84. We received 34 responses to this question. Twenty-nine respondents agreed with our proposal for weekly payment cycles, we received four mixed responses, and it was unclear if one respondent agreed or disagreed.

3.85. One respondent noted that we did not propose a minimum time to process voucher redemption applications. They stated that a weekly payment cycle may not result in a payment being issued within a week of a redemption application being made. The respondent further stated that we must commit to a timescale for a decision to be made on whether to accept or reject a voucher redemption application. They highlighted that a long processing time would not be suitable for smaller organisations.

3.86. Many respondents highlighted the importance of cashflow in making the scheme a success, especially for smaller organisations. They noted that long waits to be paid would put smaller organisations off from participating in the BUS, and this was one of the failings of the GHG.

Ofgem response and final administrative approach

3.87. From the content of the responses, we believe that those who agreed with weekly payment cycles expected a week to be the maximum time between making a redemption application and receiving the payment. However, the weekly cycle in our consultation refers to the regularity at which Ofgem will make payment runs – ie how often we will pay out to approved redemption applications. It isn't intended to be an indicative timeframe between the submission of a redemption application and payment being made at which Ofgem will make payments out to installers rather than an indicative timeline associated with submissions from installers.

3.88. Once a redemption application has been submitted, we will assess it against the eligibility criteria. Once this assessment is complete, we will notify the installer if the redemption application was successful. We expect installers will be paid within seven days of a successful redemption notification in most cases, due to our intended weekly payment cycle.

3.89. We won't issue vouchers if budget isn't available for them to be redeemed (as set out in the response to question 17). Installers can therefore be confident that there will be budget available to make a payment if their redemption application for an eligible installation is successful.

3.90. At this stage we cannot commit to a maximum processing time for a decision to be made on receipt of a properly made redemption application. However, we understand the importance of prompt processing and intend to make decisions as quickly as is feasible without compromising the integrity of eligibility checks.

4. Audit and compliance

Section summary

This section sets out our audit and compliance administrative decisions.

Questions

Question 20: Do you agree or disagree that installers should be required to inform property owners about the possibility of audits at the application stage and to confirm this to Ofgem? If you disagree, please say why.

Question 21: Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.

Question 22: Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.

Question 20

Do you agree or disagree that installers should be required to inform property owners about the possibility of audits at the application stage and to confirm this to Ofgem? If you disagree, please say why.

Summary of responses

4.1. We received 37 responses to this question. Twenty-one respondents agreed with the proposal that installers should be required to inform property owners of the possibility of an audit.

4.2. Seven respondents disagreed with the proposal, their main point being that it should be Ofgem notifying and informing property owners of possible audits.

4.3. Nine respondents provided mixed responses. Five respondents stated that Ofgem should inform property owners of possible audits during the application stage which installers can then reiterate. Three respondents suggested that Ofgem should set out what an audit would consist of which they can then pass on to property owners. One response questioned whose responsibility it will be to ensure the quality of installation.

Ofgem response and final administrative approach

- 4.4. We will proceed with our proposal that installers must inform property owners of the possibility of a future audit.
- 4.5. When we seek the property owner's consent to an installer making an application on their behalf during the application stage, we will also inform property owners of the possibility of audits, as per our original proposal.
- 4.6. Information will be provided on audits in both the installer guidance and consumer guidance, which installers can use to assist their conversations with property owners.

Question 21

Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.

Summary of responses

4.7. We received 31 responses to this question. Nineteen respondents agreed with the policy decision (outside the scope of this consultation) giving Ofgem powers to withhold payments during investigations carried out by Ofgem, MCS or Consumer Codes. Those that agreed stated that withholding payment should be a last resort action.

4.8. Four respondents disagreed with the proposal. Three respondents shared the same concern regarding the 14-day period that Ofgem has to issue notices of withholding. Respondents wanted a shorter window on the notice period of around seven days. One respondent stated that there should be a cap on the number of payments that are withheld for an installer.

4.9. Eight respondents provided mixed responses. The main concern was around the transparency of decisions to withhold payments.

Ofgem response and final administrative approach

4.10. We will implement processes to withhold payments during investigations. Decision notices will be provided within 14 days following the decision. This is as set out in the regulations, and we do not have discretion over this.

4.11. We will not be imposing any cap on the number of payments we withhold from an installer. The number of payments we withhold during an investigation will depend on the circumstances of the individual case.

4.12. We will explain the reason for any decisions we take exercising these powers within the decision notice we provide to installers.

Question 22

Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.

Summary of responses

4.13. We received 32 responses to this question. Twenty-one respondents agreed with the proposals on offsetting payments and, where required, repaying grants.

4.14. Five respondents disagreed with the proposal. Two respondents suggested that payments should not be offset and should just be repaid. Two respondents stated that the installer should be involved in the process of determining whether a payment should be offset or repaid. One respondent suggested that where payments are offset or repaid, those installers should have specific terms attached to them to prevent them claiming the money from homeowners.

4.15. We also received four mixed responses. Two of those stated that where payments are offset or repayments decisions are made, a time frame should be included for resolution and where further sanctions are applied installers must be informed of the impacts.

4.16. Two respondents were unsure. One respondent stated that repayment and offsetting payments should only be used as a last resort and where there are shortcomings by the homeowner such as insufficient insulation, there should be an opportunity to rectify before taking action to repay or offset.

Ofgem response and final administrative approach

4.17. In cases where we are satisfied that an installer has received a BUS grant that they were not entitled to, we will decide on a case-by-case basis whether the grant payment is to be repaid or offset.

4.18. Where we issue a notice for a grant amount to be repaid, the installer will have at least 28 days after the date of the notice to act.

4.19. Where we issue a notice for a grant amount to be offset there will be no further action for the installer to take, other than to complete the work on subsequent BUS installations as they would have otherwise done. When a future BUS voucher(s) is/are redeemed, the normal redemption process shall apply but a payment will not be issued, until the outstanding amount is offset.

4.20. Where appropriate, installers will be given opportunities to come into compliance with the requirements of the scheme. We are unlikely to offset payments where we have identified fraud and will only use this mechanism where the installer has other live BUS applications to offset against.

5. Appeals – right of review

Section summary

This section sets out how we propose to administer installers right to request a review of decisions we have made as administrators of BUS

Questions

Question 23: Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.

Question 23

**Do you agree or disagree with our proposed administration of the right of review?
If you disagree, please say why.**

Summary of responses

5.1. We received 32 responses to this question. Twenty-two agreed with our proposed administration of the right of review process, six disagreed, two provided a mixed response, and a further two responses were unclear as to their preference.

5.2. Those who agreed thought it was important that there is a right of review process in place so installers could challenge decisions we make. One proposed including experts from industry alongside Ofgem representatives in decisions that were referred for review by an installer. Another stressed the importance of using a fair and proportional approach to withholding payments since the decision to do this cannot be reviewed.

5.3. Those in disagreement recognised the importance of the right of review process being in place but had concerns about timescales and those conducting the review. One respondent suggested a 14-day period for us to review a decision should be appropriate. Another thought the period for an installer to submit a request and for us to communicate our review decisions should be the same, rather than 28 days for installers to submit a request and 21 days for us to confirm a decision after we have made it.

5.4. Others that disagreed stated that reviews should be carried out by a third party, as this would be fair for Ofgem and for installers.

5.5. Among the four mixed and unclear responses, it was suggested that we should include MCS and the relevant consumer code in the review process. One respondent stated that installers should be able to include legal representation or their trade body in any review process.

Ofgem response and final administrative approach

5.6. Installers have a right to review decisions made by us where they believe we have made an error or arrived at an incorrect decision. Installers may instigate a review on any decision we make, including where we decide to reject voucher applications, revoke vouchers, require repayment, and offset payments. Installers will not be able to review decisions by us to withhold payments. Where a decision to withhold payment has resulted in a revocation, installers can review that revocation decision.

5.7. An application for a decision to be reviewed must be received by us within 28 days of the date of notification of the decision. We will provide a standard template that should be used when requesting a review. Where we require additional information, we will contact the relevant person, setting out clear deadlines.

5.8. A review will be carried out by an Ofgem official. This official will not be a person who was involved in the original decision which is being reviewed.

5.9. We aim to reach a decision within 20 working days of receiving a review request. If it is not possible to do so in that time, we will provide the installers, and any other person affected by a decision, with an update within this time.

5.10. We will notify installers, and any other person affected by a decision, of the result within 21 days of concluding the review and making the decision.

6. Scheme reporting

Section summary

This section covers our reporting requirements as BUS administrator, and our response to the suggestions of information and data to include in our reports received in our consultation.

Questions

Question 24: How frequently would you like Ofgem to publish reports on vouchers issued and available budget? Please provide a frequency and your reasoning behind it.

Question 25: What additional information could be included in the reports? Do you have any suggestions for additional information that could be included in reports, or on the format of the reports?

Question 24

How frequently would you like Ofgem to publish reports on vouchers issued and available budget? Please provide a frequency and your reasoning behind it.

Summary of responses

6.1. We received 35 responses to this question. The proposal set out the legislative obligations on us to publish aggregated reports quarterly and annually. Most respondents suggested that we should publish at least monthly reports on the number and value of vouchers issued and available budget.

6.2. Twenty-four respondents broadly agreed that we should publish reports monthly for clarity and consistency, and that this is our approach on other schemes we administer. Those who proposed monthly reporting highlighted the need to monitor demand, the speed of the application process, and the number of vouchers issued and redeemed. This would also help predict future demand in upcoming voucher application periods.

6.3. Within this group of 24 respondents, it was frequently suggested that reporting should be “monthly at a minimum” suggesting respondents had an appetite for more frequent reporting if possible.

6.4. This appetite was also expressed in seven respondents who went further. Weekly and live reporting were preferred among these respondents. Those who provided an alternative reporting frequency referred to the need for installers to gauge likely availability of vouchers as well as consumer protection reasons and the need to analyse the impact on property owners. Some stated that we should provide a real-time indicator to monitor scheme performance, showing remaining grant funding, daily applications, vouchers issued, and vouchers redeemed. They also highlighted that any changes to available budget must be communicated as soon as possible.

6.5. Providing a contrasting view, four respondents thought that a mix of quarterly and annual reporting would be sufficient for the scheme.

6.6. Four respondents recommended that we report on any issues arising with the voucher application or approval process in more detailed quarterly and annual reports. This would help industry, and others, improve on any issues being encountered.

Ofgem response and final administrative approach

6.7. The BUS regulations require us to publish quarterly and annual reports.

6.8. We acknowledge the broad consensus that the reports on vouchers issued, and available budget should be published monthly, and as such, we intend to publish monthly reports containing the number and value of vouchers issued and the available budget. We recognise that some participants suggested that reporting should be more or less frequent, however, we believe that a monthly report strikes the right balance between regularity and feasibility.

6.9. We intend to publish the following budget-related information:

- Annual budget allocation
- Quarterly budget allocation, if applicable
- Available budget
- Allocated budget
- Redeemed budget

6.10. Available budget refers to the total available budget for the year or quarter. This will be calculated as total budget – allocated budget – redeemed budget.

6.11. Allocated budget refers to total value of issued but not redeemed vouchers for the relevant financial year or quarter

6.12. Redeemed budget refers to the total value of BUS grants that have been paid by us to installers within that financial year.

6.13. Publishing monthly reports is in line with our approach among the other schemes we administer.

Question 25

What additional information could be included in the reports? Do you have any suggestions for additional information that could be included in reports, or on the format of the reports?

Summary of responses

6.14. We received 32 responses to this question. Most of the responses spanned across four themes: application status, budget, policy success metrics, and compliance.

6.15. Regarding the status of BUS applications, 11 respondents proposed reporting information on the number of applications received and 14 respondents suggested reporting on the number of vouchers issued. Other common suggestions were on the number of vouchers redeemed and expired, the average number of days for voucher issuance and redemption, the number of applications refused, the amount of budget allocated, and remaining budget. Some respondents also suggested that we report on the amount of budget spent and the amount recycled due to expired vouchers.

6.16. The majority of respondents suggested that we publish information on the number of applications received broken down by technology type. Eleven respondents suggested we break down the data by geographical area. Other suggestions included information on carbon savings, the size of installations, and the cost of installations by size.

6.17. Qualitative information on the types of compliance actions being taken on the scheme were also common suggestions. Twelve respondents suggested that we publish the number and types of action being taken against companies, 11 thought we should publish the number

of compliance actions launched by us, and nine requested we publish the number of compliance actions resolved. Other responses included the number of faulty installations, the number of non-compliant systems by issue type, the number of audits undertaken, and the number of vouchers revoked.

6.18. Lastly, two respondents suggested we publish anonymised voucher data so interested parties could conduct their own analysis. One respondent requested we mirror the format used on the DRHI, and one suggested we provide the information included in the GHG Voucher Scheme report.

Ofgem response and final administrative approach

6.19. In a change to our consulted-on approach, the format of our published reports is yet to be confirmed and will be set out in guidance.

6.20. The reports will provide information on:

- The number and value of vouchers issued
- Number of applications received
- Number of applications rejected
- Queue length (when applicable)
- Number of enquiries received
- Number of enquiries resolved

6.21. We may also publish data with a breakdown of technology type, capacity, geographical deployment of installations and applications, and other policy success metrics.

6.22. Following feedback, we intend to publish information on the number and types of compliance actions being taken against companies, the number of disputes launched or resolved, the number of audits undertaken, the number of vouchers revoked, or the reasons vouchers were rejected. Whether this information is in the quarterly or annual reports is to be confirmed. and will be set out in guidance.

6.23. However, we do not intend to publish information such as the number of faulty or non-compliant installations, as we will not have access to the complete data on these issues.

6.24. We will keep under review whether any additional information should be included in our reporting as the scheme progresses.

Further comments

A number of respondents gave some additional feedback outside of direct answers to the questions. Where the content of these related to questions asked in the consultation, these responses have been referred to within the relevant sections.

Appendix 1. List of respondents

1. Yorkshire Energy Systems Limited
2. Windhager UK Ltd
3. Elmbridge Borough Council
4. Caplor Energy
5. Birdshill
6. Bright Green Renewables Ltd
7. UK Alternative Energy Ltd
8. Nu-Heat UK Ltd
9. Mr. Colin Trussell
10. Alto Energy Limited
11. Mr. Sean Durney
12. Association for Renewable Energy and Clean Technology (REA)
13. Elmhurst Energy Systems Ltd
14. Heat Pump Association
15. Ground Source Heat Pump Association
16. Ms. Justine Lowe
17. Mitsubishi Electric Europe
18. Renewable Energy Assurance Limited, administrator of RECC
19. Kensa Group Ltd
20. NAPIT
21. Kensa Heat Pumps Ltd
22. Microgeneration Certification Scheme (MCS)

- 23. Solec Energy Solutions Ltd
- 24. E3G
- 25. Policy Connect
- 26. National Custom and Self Build Association (NaCSBA)
- 27. E.ON UK Plc on behalf of E.ON Installation Services Ltd
- 28. Pacifica Home Services
- 29. Mineral Wool Insulation Manufacturer's Association (MIMA)
- 30. EDF
- 31. ECA
- 32. Scottish Power
- 33. Abode Heat Ltd
- 34. Heat Pump Federation
- 35. LMF Energy Services
- 36. Energy Saving Trust

We received 44 responses to the consultation. The identities of 8 respondents are being retained to protect their confidentiality. Of these, six responses are being kept entirely confidential. The final two respondents requested specific parts of their responses to remain confidential.