

## Template for response to “Administration of the Boiler Upgrade Scheme” consultation

<p>This template relates to “Administration of the Boiler Upgrade Scheme” consultation and contains all the questions posed within the document. Through this template we’re aiming to collect your feedback on our proposals on how we will administer the Boiler Upgrade Scheme. We welcome your views and encourage you to respond to the questions on the questions that are of most interest. Please provide your contact details in the fields below. To respond, please provide your views in the space below the relevant question.</p>	
Organisation Name:	Bright Green Renewables
Organisational Type:	Renewable Heating Installer
Completed by:	Emily Groocock
Contact details:	<div style="background-color: black; width: 200px; height: 20px;"></div>
Confidential response:	Yes <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Anonymous <input type="checkbox"/>

## Questions on the proposed administration of the Boiler Upgrade Scheme

<p>1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.</p>
<p>It is a lot of additional work for installers. Not all customers may wish to give us receipts, and title deeds to properties to prove certain things. What happens if a customer refuses to provide evidence? I’m concerned how much of this responsibility falls on installers shoulders for the application to be successful. We need exact guidance from the scheme as to what installers require from the customer.</p>
<p>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.</p>
<p>Disagree. As above, a lot of unnecessary additional work for installers. For the GHG and RHI, installers had to do none of this. Why for BUS has this been changed? We don’t know what evidence we must get to prove a self build, we’re hoping architect plans will suffice but to what extent must evidence be provided? In referring to MCS response to the consultation, I fully agree that customers may not feel comfortable in sharing invoices, plans, planning permission, receipts etc, and it should be their responsibility to upload to an easy to use portal to cut out the middleman of the installers. We need to make this as simple as possible for installers as looking at RHI</p>

take up for our company, we need as much guidance and simplicity as possible for this to be a success, unlike the Green Homes Grant.	
3. Is there any other evidence we should request to prove that properties are custom-build?	
	Again, I agree fully with the MCS response to this question. The customer or custom builder must fill out a form clarifying this, I cannot imagine any customer willing to pass on title deeds and invoices to an installer, to then be passed on to multiple other companies. I strongly disagree that all of this responsibility falls on the installer. If anything architect plans or a simple planning permission granted letter from local councils should suffice
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.	
	We rarely get customers enquiring in social housing however if we did I agree with MCS' consultation response on this 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.	
	Agree, however homeowners must have a chance to have any appropriate insulation works carried out before their new EPC is issued and available to be accessed via API.
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.	
	I agree with MCS response on this question. The 3 month validity period seems too short to get everything in place, especially if insulation is required. Materials and equipment are long delays at the moment due to COVID so this could throw up issues.
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?	
	N/A
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.	
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.	

What do Ofgem/BEIS class as a 'rural area'? As MCS state in their response, some off gas villages are quite large. I also agree heat pump installations do not need to provide evidence of being in a rural area.
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.
Agree
11. Do you agree that the 'authorised signatory' for business accounts should be an individual with legal authority to represent the organisation eg 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.
Agree – I'm hoping multiple users can be set up to access any training materials/portals.
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.
Agree – it would be good to get some clarity on the permissions though – will user management permission also be able to make voucher applications, edit, cancel etc? Or can only a voucher application permission user do that?
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?
Agree with MCS response. A checklist for the customer to fill in would suffice.
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
The information is fine however I disagree that this is the installers responsibility. As mentioned previously homeowners may not be comfortable to provide such personal information to be passed through multiple parties. A portal for customers only (purely to upload sensitive information) may be useful. Installers do not need to see title deeds and building material invoices etc. Installers can send customers a checklist to sign to state they agree to what we are doing.
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
Agree with MCS response – Ofgem payment to installer needs to be streamlined and quick to avoid losses.
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?

Agree with MCS' response fully – if vouchers are rejected based on no money being 'left in the pot' for that year, would installers be reimbursed for all of the work done admin wise, assessments, reports, site visits etc?
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
Agree with MCS' response fully.
18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
Agree with MCS' response fully. Too much is becoming the installers responsibility. As well as general ordering, invoicing, quoting, scheduling, we also are expected to evidence gather (for multiple different questions) which I agree will be very time consuming and could easily be the homeowners responsibility.
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
Agree as long as payments are prompt.
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.
Yes agree. However homeowners must be informed of the reasonings of this potential audit and exactly what to expect if an audit goes ahead.
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
Agree
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
Agree
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
Agree
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.

Monthly
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?
Agree with the MCS response to the consultation.