

## 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:	N/a
Organisational Type:	Member of the public
Completed by:	
Contact details:	
Confidential response:	Yes <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Anonymous <input checked="" 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>Agree – although EPC evidence requirements need updating. (this does not clearly fit into Q1 or Q6 but is in between).</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 – the current criteria allow individuals to apply and get grants to do up second or holiday homes. What defines – “Major renovation, extension or heating system replacement?” Under this description and the occupation limit (less than 183 days in last 12 months) applicants with a holiday let or second home would be eligible to apply and have improvements funded. This takes away grant funding from improving primary homes housing families which may be fully occupied and provides grant funding to those that may have means to fund improvements anyway. accommodation).</p> <p><u>Grants provided for second or holiday homes would increase property value but would not necessarily reduce carbon emissions if properties are not occupied in winter months – allocating grant money to heating systems (ASHP or GSHPs) that may not be often used,</u></p>

<p><u>in place of grants to primary residences which are used all year for heating.</u> The environmental benefit / CO2 saving of installation to second homes / holiday homes could not be accurately quantified - cost benefit/ environmental benefit would clearly be lower than installations in primary homes.</p> <p>Suggest that eligibility is restricted primary residence not a second home (to allow grants for those purchasing and improving a home to live in or rent). Exemptions for long term rental (with evidence / legal declared commitment) could be considered e.g. for conversions / improvements to then rent as long term rental (not Airbnb / holiday letting). For example provide evidence of rental through a letting agent, tax self assessment or through Tenancy deposit scheme system for AST.</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>
<p>You probably need to consider a cut off for properties that may be part original, part 'custom build'. If an property is purchased, used as a holiday home then converted into multiple properties, grants should be restricted or you are subsidizing the cost of conversion.</p>
<p>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.</p>
<p>Agree</p>
<p>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.</p>
<p>Agree but EPC criteria / evidence need to be updated:</p> <p>A CERTASS accredited installer should be able to certify the presence of existing Cavity Wall Insulation in older properties. At present, for properties built before 1985, only visible drill holes (which may have been rendered over in last 30 years), guarantee certificate (which may have been discarded by previous owner after 25 yr expiry) or a surveyor letter can be used as evidence. A surveyor costs £250 and would drill further test holes without repairing them (leading to further cost). This means it is not possible to update an EPC to reflect presence of CWI without excessive cost / damage to property &amp; weatherproofing risk.</p> <p>If a CERTASS accredited CWI installer can certify they have completed work, why are they not able to certify that CWI already is in place following their drill testing? If their business is to sell / install insulation there is limited gain in them providing incorrect confirmation of CWI being present when it's not there.</p>
<p>6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.</p>
<p>Disagree – Seems to be no exemption for CWI for wind driven rain areas as previously stated for RHI? Although newer insulation is available for these areas, the cost is around £3K so if CWI is required for areas that have severe wind driven rain, then grants should be made available for installation as cost is 3 x that of standard retrofit CWI.</p> <p>Getting funding and finding suppliers for cavity Wall Insulation in highly windy / rain exposed areas is extremely difficult. More guidance is also needed to reduce confusion about appropriate CWI and prevent incorrect installation of cheap CWI in such areas which may fail – much info in internet suggests retrofit CWI is not suitable in many locations.</p>

EPC criteria / evidence need to be updated:

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If a CERTASS accredited CWI installer can certify they have completed work, why are they not able to certify that CWI already is in place following their drill testing for an EPC assessment? If their business is to sell / install insulation there is limited gain in them providing incorrect confirmation of CWI being present when it's not there.

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

The current criteria allow individuals to apply and get grants to do up heating systems in second or holiday homes based on the occupation limit (less than 183 days in last 12 months) applicants with a holiday let or second home would be eligible to apply and have improvements funded. This takes away grant funding from improving primary homes housing families which may be fully occupied and provides grant funding to those that may have means to fund improvements anyway. Suggest that eligibility is restricted to "major renovations" only for existing domestic dwellings not occupied or confirmed as primary residence not a second home (to allow grants for those purchasing and improving a home to live in or rent). Grants provided for second or holiday homes would increase property value but would not necessarily reduce carbon emissions if properties are not occupied in winter months – allocating grant money to heating systems (ASHP or GSHPs) that may not be often used, in place of grants to primary residences which are used all year for heating. The environmental benefit / CO2 saving of installation to second homes / holiday homes could not be accurately quantified - cost benefit/ environmental benefit would clearly be lower than installations in primary homes.

Exemptions for secondary homes could apply if evidence of long term rental or legal commitment to let for long term rental (with follow up evidence) is provided e.g. via taxation self assessment / tenancy deposit scheme system for AST.

EPC criteria / evidence need to be updated:

A CERTASS accredited CWI installer should be able to certify the presence of existing Cavity Wall Insulation in older properties for an EPC assessment. At present, for properties built before 1985, only visible drill holes (which may have been rendered over in last 30 years), guarantee certificate (which may have been discarded by previous owner after 25 yr expiry) or a surveyor letter can be used as evidence. A surveyor costs £250 and would drill further test holes without repairing them (leading to further cost). This means it is not possible to update an EPC to reflect presence of CWI without excessive cost / damage to property & weatherproofing risk.

If a CERTASS accredited CWI installer can certify they have completed work, why are they not able to certify that CWI already is in place following their drill testing for an EPC assessment? If their business is to sell / install insulation there is limited gain in them providing incorrect confirmation of CWI being present when it's not there.

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.
Agree
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.
Agree – if updated to modern census. 2011 data appears out of date with some settlements classed as rural towns when they are now enlarged and more urban (similar to other 'urban' classed areas in district). In addition clarity is needed for "Areas outside of settlements with a population of 10,000 people or more" .How far outside the settlement is rural? E.g. a self built property or renovation half a mile or less outside a town of 10,000 would be able to get a biomass boiler grant? Would it include planned imminent urban expansion areas from local plans in the area and population size?
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
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.
N/A
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?
N/A
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

<p>DISAGREE – grants should be eligible on primary residences only, or those to be let out on long term Assured Long Tenancy contracts. Owners should make a declaration which could be backed up by evidence in the event of auditing that it is their sole / only residence or will be let out under an AST contract for long term rental.</p> <p><u>Grants provided for second or holiday homes would increase property value but would not necessarily reduce carbon emissions if properties are not occupied in winter months – allocating grant money to heating systems (ASHP or GSHPs) that may not be often used, in place of grants to primary residences which are used all year for heating.</u> The environmental benefit / CO2 saving of installation to second homes / holiday homes could not be accurately quantified - cost benefit/ environmental benefit would clearly be lower than installations in primary homes.</p> <p>Exemptions for secondary homes could apply if evidence of long term rental or legal commitment to let for long term rental (with follow up evidence) is provided e.g. via taxation self assessment / tenancy deposit scheme system for AST.</p>
<p>15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.</p>
<p>Agree</p>
<p>16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?</p>
<p>17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.</p>
<p>DISAGREE – grants should be eligible on primary residences only, or those to be let out on long term Assured Long Tenancy contracts. Owners should make a declaration which could be backed up by evidence in the event of auditing that it is their sole / only residence or will be let out under an AST contract for long term rental.</p> <p><u>Grants provided for second or holiday homes would increase property value but would not necessarily reduce carbon emissions if properties are not occupied in winter months – allocating grant money to heating systems (ASHP or GSHPs) that may not be often used, in place of grants to primary residences which are used all year for heating.</u> Unlike RHI – which was paid based on usage / KWhr and energy saved, the grants would be a flat rate so the same grant regardless of how much the heating system was to be used. The environmental benefit / CO2 saving of installation to second homes / holiday homes could not be accurately quantified - cost benefit/ environmental benefit would clearly be lower than installations in primary homes.</p> <p>Exemptions for secondary homes could apply if evidence of long term rental or legal commitment to let for long term rental (with follow up evidence) is provided e.g. via taxation self assessment / tenancy deposit scheme system for AST.</p>
<p>18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.</p>
<p>Agree – in terms of issuing process to installers</p>

19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
Agree
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.
Agree but see earlier point – eligibility should be for primary homes (with limited exemptions for long term rental) or there is limited quantifiable carbon saving from the installations (in fact construction / manufacture/ installation of little used heating systems may have a significant net CO2 increase in emissions). Applicants should sign (online) a confirmation that the home is a primary residence / sole home or will be let out on a long term AST. If found to provide false information / not rented property or not using as primary residence, grant should be repaid. Exempted properties for long term rental could be cross checked against AST deposit scheme systems.
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
N/A
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
N/A
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
N/A
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.
N/A
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?
What proportion are self build / conversions, and what proportion are rental properties , the rest SHOULD be primary residence...but if not what proportion are second / additional homes which will have less environmental benefit due to lower occupancy and lower heating usage.