

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

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.	
Organisation Name:	LMF ENERGY SERVICES
Organisational Type:	INSTALLER
Completed by:	IAN EVANS
Contact details:	<div style="background-color: black; width: 100px; height: 1.2em;"></div>
Confidential response:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Partially <input type="checkbox"/> Anonymous <input type="checkbox"/>

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

1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.
<p><b><i>The yet to be published Guidance and application checklists and forms should be clear, unambiguous and complete. For a simple example the eligible existing ‘fossil fuelled or electric heating system’ should be fully defined in both so as to avoid confusion and wasting Applicants’ and Installers’ time. While this is a consultation on administration, it is nonetheless noted with disappointment that the scheme will seemingly offer no support to households that do not have central heating. All possibly required information and evidence required and the pathway from application through to full completion of the entire process should be clearly set out from the beginning. The GHGVS often involved its Administrators asking for new information and evidence already supplied, or that was publicly available or that was not required for the purported reason for the request. Lessons from that scheme should be applied here. The guidance, checklist and forms should ensure no surprises on compliance requirements later on. As per our response to question 2 below Installers and or Applicants should both be able to provide any required evidence in support of applications.</i></b></p>

<b><i>Additionally EPCs may no longer accurately reflect what is currently present in a property and so lodgement of a new EPC for the purposes of the Application to be accurate should be permitted.</i></b>	
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.
<b><i>Installers should be able to do so but not exclusively so. Applicants should be allowed to submit evidence not only for custom-build properties but for any part of their application. Applicants may not wish to share such private and sensitive information and documents with Installers and as per GDPR etc the requirement to share should be kept as minimal as is reasonably practicable. For custom build properties council tax bills and VAT reclaim documents may well not yet be available at the point of seeking to install space and water heating.</i></b>	
3.	Is there any other evidence we should request to prove that properties are custom-build?
<b><i>As stated above in response to question 2 for custom build properties council tax bills and VAT reclaim documents may well not yet be available at the point of seeking to install space and water heating. A self declaration regarding custom build containing appropriate wording regarding fraud and the like would likely suffice, although necessarily this would need to be completed by the Applicant rather than the Installer.</i></b>	
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.
<b><i>A self declaration regarding non-social housing containing appropriate wording regarding fraud and the like would likely suffice, although necessarily this would need to be completed by the Applicant rather than the Installer. The yet to be published Guidance and application checklists and forms should clearly set out the practical tests for social housing to be built upon section 68 of the Housing and Regeneration Act 2008. For example the definition of and evidence requirements towards establishing that a property is let above market rate.</i></b>	
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.
<b><i>This is agreed on the basis of the suggestion in the consultation document that this 'will provide a seamless experience for users'.</i></b>	
6.	Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
<b><i>Mainly agree. If an installer is accredited to install loft and cavity wall insulation then their confirmation that such insulation cannot or should not be installed in a particular property should be sufficient.</i></b>	
7.	Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?



<b><i>None immediately apparent.</i></b>
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.
<b><i>Disagree. Any declaration and or evidence for such should be provided by the Applicant rather than the Installer.</i></b>
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.
<b><i>The link provided in the consultation is to the general ONS Open Geography Portal landing page. A page specific link to the relevant data that was proposed to be relied upon should have been provided. Without that it is difficult to properly answer this question.</i></b>
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.
<b><i>No strong opinion either way.</i></b>
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.
<b><i>Agreed for limited companies. For sole traders, partnerships and the like the scheme guidelines for establishing sufficient legal authority appear not to have been included in this consultation and so it is difficult to give a full answer.</i></b>
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.
<b><i>Agreed.</i></b>
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?
<b><i>No.</i></b>
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

<b><i>Disagree. A signed consent form could be included in the application.</i></b>
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
<b><i>Disagree. There is no apparent reason for the period to be so short. It should be longer, say 14 days, 28 days even. (Please also see response to question 23 below).</i></b>
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
<b><i>Where a budget has already been reached any subsequently issued voucher notification should clearly indicate this is the case. It is regrettable that queuing mechanism proposals have not been decided upon yet so as to be included in this consultation. Worse, it is unclear whether and how a voucher issued before a budget has been reached can remain eligible for funding should additional vouchers be issued and redeemed thereby breaking the budget. Any such uncertainty should be avoided. Especially since Installers under this scheme may well have had the misfortune to have been involved in the GHGVS and all the unnecessary difficulties and more that the administration of that scheme caused.</i></b>
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
<b><i>Please see response to question 16 above.</i></b>
18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
<b><i>No strong opinion either way.</i></b>
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
<b><i>Agreed.</i></b>
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.
<b><i>Installers should be required to highlight to Applicants such warnings as the Scheme administrator publishes in their standardised documents, so as to ensure consistency of message across the scheme.</i></b>

21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
<b>No strong opinion either way.</b>
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
<b>No strong opinion either way.</b>
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
<b>The time limit for providing the response to right to review should match the time limit for Installers to provide information, instead of 21 days and 14 days respectively. Say 21 days for both,, or perhaps 28 days (again for both).</b>
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.
<b>The publication of these statistics should be monthly similar to those for ECO, GHGVS and GHGLAD.</b>
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?
<b>The statistics should mirror the sort of information included in the GHGVS monthly report, from which applications, measures, locations and status of them up to and including payment (amongst other things) are all included.</b>