

## 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:	UK ALTERNATIVE ENERGY LTD
Organisational Type:	RENEWABLES INSTALLER
Completed by:	MARK OGILVIE
Contact details:	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
Confidential response:	Yes <input type="checkbox"/> <b>No</b> <input checked="" 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>AGREE</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 – owners are the natural source of this information. Consideration should be given to a pre-qualification step for them to complete before approaching installers for a BUS-funded job.</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>
<p>SAP calculations; architect drawings; geotagged photo evidence (but with a much simpler app than the awful ICF app in GHG); planning permission. It is essential the evidence asked for is likely to be available at the time that heating systems are being installed.</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>

DISAGREE – property owner is the natural source of this declaration. There should be a pre-qualification step for them to complete before approaching installers for a BUS-funded job.
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
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
AGREE
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?
NO
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
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.
AGREE
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?
DISAGREE – there should be an explicit installer declaration that the quote as submitted for voucher application relates to the property status and the installed heating system at the date of application. This will prevent or reduce speculative applications which could mop up vouchers and delay genuine applications. ADDRESS – there should be an agreed source of address. Many customers do not know their correct address, and omit post towns, for example. The source should be the Royal Mail postcode database. This will reduce fraudulent applications; and also assist in DNO applications.
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
AGREE – but why shouldn't this step also be used for confirmation of both Custom Build and non-Social Housing status? (see my earlier responses regarding this). You are placing the onus on the installer to vouch for these declarations, when it should be the resident's task.
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
DISAGREE – what happens if the 7-day period elapses? – you don't say. Two-week holidays or illness could prevent a response. Installers could be left with multiple re-applications to do, absorbing time and effort. Increase to 18 day period for response. Most responses will be within 2-3 days, but this increase would prevent increased application churn due to valid reasons for non-response.
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
Explicit declaration that the project is a Custom Build where this is relevant
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
Can't say. Nobody knows if all the vouchers will disappear on Day 1; or whether an orderly application will take place. I don't see how you expect installers to plan and manage sales and cashflow without some control of voucher availability. But it seems to me BEIS is not too bothered about the industry. By capping the annual amount, Government is capping its risk, and passing all the risk onto installers. Fine for the Chancellor, but it's left industry to manage customer expectations and business planning.

18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
Please don't force us to use a smartphone app like ICF; the information requested was difficult to input using a smartphone. We need a confirmation that the redemption request has been submitted, with some sort of installer dashboard to keep track of vouchers. We need a handshake confirmation that every transaction (voucher application, redemption, additional information) has completed and you have received the information. ICF applications for GHG just disappeared into a black hole. Keeping track of these vouchers will mean survival or going bust for many installers.
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
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
AGREE – but only if your staff are better trained than the GHG staff. We experienced repeated mistakes in rules application with GHG. Many valid applications were turned down incorrectly. It took repeated communications demonstrating validity from company registrations and / or product eligibility to obtain approval. Rulings by call centre staff were not uniform; it just depended on who you got. Amateur hour. Ofgem have a much better track record than BEIS in my experience, but it needs to work.
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
AGREE – as long as you keep installers informed. This information needs to be captured on an installer dashboard.
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
DISAGREE – what you have set out has no time frame for the review and appeals process, so how can we agree to it? 'A timely manner' means nothing. Government sat on thousands of GHG vouchers for months, then issued them all in one lump, all with similar expiry dates, and left industry to pick up the pieces. So don't expect us to trust Government to run another scheme properly now. This could screw cashflow for SMEs. This needs defining now – it's January and this thing starts in April. I suggest a 7-day response deadline for decisions on reviews, with full reasons given.
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.

WEEKLY – this will be essential to be able to gauge how the voucher market is running and what likely availability is going to be during the year. By designing the scheme this way, you are creating a secondary market in vouchers, whether you meant to or not; and markets only run efficiently with good information.

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?

- Type of technology breakdown for all the following (ASHP / GSHP / biomass)
- Number of applications received
- Number of vouchers issued
- Number of vouchers refused / more information required
- Number of vouchers returned to pool after expiry
- Number of vouchers redeemed
- Number of redemptions refused with reason
- Number of applications being audited with results
- Numbers of type of property (i.e. retrofit / customer build)
- Regionality – I don't care about this, but I expect BEIS will