

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:	Caplor Energy
Organisational Type:	Renewable installer
Completed by:	Gareth Williams
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

<p>1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.</p>
<p>Yes</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>Yes – but keep it simple – a self declaration from the owner ?</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>
<p>Yes – but keep it simple – a self declaration from the owner ?</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>

Yes
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>No – I disagree. Some properties will find it very difficult to physically deliver the recommendations of an EPC from a practical perspective. But the main point I disagree on here is overall cost and timing. If a client needs to upgrade the boiler then there is presumably a rush as the existing one is broken or perhaps about to break. So there may not be time to take EPC measures. But also significantly at £5k for the pump support we are already asking home owners to cover a shortfall in the cost of the boiler and a larger sum than would be spent in simply replacing with oil or gas. To ask the owner to go further and spend even more on measures is going to stretch the cash availability and likely result in less take up of the scheme and prohibit those that are not significantly cash rich – not an aim of the scheme to bias towards richer households I'm sure.</p> <p>Our experience is that once on a more sustainable journey, owners actually want to revisit and make further improvements to their properties as time and budget allows.</p> <p>So I would urge extreme caution here and encourage EPC take up of advice but not make it conditional.</p>
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
<p>If a letter is required then would urge to reduce profiteering from potential agencies and suppliers that the letter can be self-certifying from the owner. If they 'cheat' then this can be made very clear that they could lose the grant if found non-compliant. That will stop the risk of fraud.</p> <p>Same for any species protection. It is not fair on timing and cost to ask homeowners to supply such. Let them self-certify.</p> <p>If a home owner needs a boiler then likely they are in a rush as already broken or in danger of (if this is not the case and they are removing perfectly good boilers then one has to wonder why others are not being prioritised) and as in the points made above the grant is not sufficient to cover these extra costs. You risk losing installs through timing delays and the increasing costs for users to be able to fund the gap between overall cost and grant.</p>
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?
<p>Please make it – quick, low cost and simple and reduce the number of people that must get involved bringing things together. That will add precious time delays and add cost – neither of which will support uptake. In the points made in table 2 about letters about the law and chartered surveys needed this absolute makes the point. – expense / time / risk. All will put people off. I strongly urge that you make doing the EPC recommendations a</p>

<p>desired outcome but not a requisite. As stated – we find people at some point, want to go on that journey as time and budget allows.</p> <p>A small point – if a property already has Solar thermal for example or PV diverting energy to hot water, or wants to have as part of the ongoing works. Surely that is OK and to be encouraged. Not discouraged as the wording seems to hint that the grant is eligible if ALL the heating and hot water is supplied. Surely you mean that it will NOT come from fossil fuel systems.....</p>	
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.	Yes – self declaration.
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.	Yes and or self-declaration
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.	A small point, but vital for some. – if a property already has Solar thermal for example or PV diverting energy to hot water, or wants to have as part of the ongoing works. Surely that is OK and to be encouraged. Not discouraged as the wording seems to hint that the grant is eligible if ALL the heating and hot water is supplied. Surely you mean that it will NOT come from fossil fuel systems.....
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.	No – our financial manager has 'authorised signatory' for our banking and that should be more than enough. The list given is fine but needs to include banking 'authorised signatory' and or a recognised financial role in a company. Finance manager, accounts manager etc.
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.	Seems Ok. make all grants 6 months as heat pumps can take several months to supply and then install. Partic at moment with COVID and BREXIT issues.

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?
No. keep it simple and they only need ask one supplier. People need to have a relationship with their supplier and one that lasts into decades. This is not a commodity purchase. Proposals take a long time for suppliers to prepare (properly) and this is really pointless exercise. MCS and industry know what is a reasonable price for a pump and associated works. Individual houses can vary hugely.
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
As with all these things – let the owner self certify on risk of having grant reclaimed if they give false information. This reduces time and costs and increase chance of engagement.
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
They may be away on holiday or ill or have a tech issue. Longer makes practical sense.
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
make all grants 6 months as heat pumps can take several months to supply and then install. Partic at moment with COVID and BREXIT issues.
18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
Not sure if correct place to comment. However, will put hee. When a customer wants a boiler there is likely to be an urgency as the boiler may be broken or about to fail. This needs to be in Ofgems minds when they set the process for this scheme. Speed and simplicity is of the essence. This will also drive user acceptance. In the event that a customers boiler has failed ther should be some form of fast rack system to allow installation if and when feasible.
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
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.

21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
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.
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?