

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

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| <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: | NAPIT Registration |
| Organisational Type: | UKAS accredited Government approved certification body |
| Completed by: | Olivia Smalley |
| Contact details: | <div style="background-color: black; width: 300px; height: 20px;"></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

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| <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, we agree with the proposed approach to evidencing existing heating systems.</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>Whilst we understand the desire by Ofgem for the voucher application process to be driven by installers, we are concerned about their liability. We suggest that Ofgem create a simple form that installers can complete with their customer, outlining the information needed to demonstrate the property is a custom-build. Whilst this form may not require submission, it allows the installer to keep a record of the confirmation which can be used in any instance of challenge.</p> <p>The confirmation by the installer, required by Ofgem, should also be worded carefully to put the liability on the customer. E.g., I (the installer) can confirm that the customer has provided me with information in line with the requirements to verify the property is a</p> |

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| <p>custom build. This information should also be clear on the property owner's portal which they log into to provide consent.</p> |
| <p>3. Is there any other evidence we should request to prove that properties are custom-build?</p> |
| <p>No comment.</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>In a similar vein to our answer to Question 2, whilst we understand the desire by Ofgem for the voucher application process to be driven by installers, we are concerned about their liability. We suggest that Ofgem create a simple form that installers can complete with their customer, outlining the information needed to demonstrate the property is not social housing. Whilst this form may not require submission, it allows the installer to keep a record of the confirmation which can be used in any instance of challenge.</p> <p>The confirmation by the installer, required by Ofgem, should also be worded carefully to put the liability on the customer. E.g., I (the installer) can confirm that the customer has provided me with information in line with the requirements to verify the property is not social housing.</p> <p>This information should also be clear on the property owner's portal which they log into to provide consent.</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>Yes, we agree with the proposal to use an API to access the information we need from a property's EPC.</p> |
| <p>6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.</p> |
| <p>Yes, we agree with the approach to administering insulation exemptions.</p> |
| <p>7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?</p> |
| <p>Ofgem should consider the possibility of a drop-down menu for PEL when creating the MCS Certification on the MID as this would make the process simpler and clearer for installers.</p> |
| <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.</p> |
| <p>In line with our answers to Questions 2 and 4, whilst we understand the desire by Ofgem for the voucher application process to be driven by installers, we are concerned about their liability. We suggest that Ofgem create a simple form that installers can complete with their customer, outlining the information needed to demonstrate the property is not connected to the gas grid. Whilst this form may not require submission, it allows the installer to keep a record of the confirmation which can be used in any instances of challenge.</p> |

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| <p>The confirmation by the installer, required by Ofgem, should also be worded carefully to put the liability on the customer. E.g., I (the installer) can confirm that the customer has provided me with information in line with the requirements to verify the property is not connected to the gas grid.</p> <p>This information should also be clear on the property owner's portal which they log into to provide consent.</p> | |
| <p>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.</p> | |
| <p>Yes, we agree with the proposed approach to evidencing whether properties are in a rural area.</p> | |
| <p>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.</p> | |
| <p>Yes, we agree with Ofgem's classification of parts that can and cannot be used before the heating system is first commissioned.</p> | |
| <p>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.</p> | |
| <p>Yes, we agree that the 'authorised signatory' for business accounts should be an individual with legal authority to represent the organisation.</p> | |
| <p>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.</p> | |
| <p>Yes, we agree with the proposed set of user permission.</p> | |
| <p>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?</p> | |
| <p>Yes, we agree with the collection of other information contained on the quote for the purpose of assurance that the property owner has been consulted and reducing speculative applications.</p> | |
| <p>14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.</p> | |
| <p>Yes, we agree with the proposed approach to obtaining evidence of property owner consent. We would recommend this being done through a simple form.</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>We agree with placing a time limit on property owners to provide consent; however, we suggest a period of 14 days for property owners to provide consent as this would be consistent with minimum cooling off period in line with consumer rights legislation.</p> | |

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| 16. Is there any additional information that you think should be included in the boiler upgrade voucher notification? |
| No comment. |
| 17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why. |
| No Comment. |
| 18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why. |
| Yes, we agree with the proposed approach to administering applications for voucher redemption. |
| 19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why? |
| Yes, we agree with the use of weekly payment cycles. |
| 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. |
| We agree that installers should be asked to inform property owners about the possibility of audits and note the suggestion in the consultation that this will also be done when the property owner provides consent via the online portal. |
| 21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why. |
| We disagree. The timescale for alerting an installer about the withholding of payment should mirror the timescale for making payments, meaning a maximum of 7 days, not the 14 proposed. |
| 22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why. |
| Yes, we agree with the proposed administration of offsetting payments and requiring repayments. |
| 23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why. |
| Yes, we agree with the proposed administration of the right of review. |
| 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. |
| <p>We request the publication of high-level monthly reports to allow installers to keep a close eye on the budget and availability of vouchers. High Level reporting could include: Number of Applications, Number of Vouchers Issued, Remaining Budget in this financial year.</p> <p>We would also welcome quarterly reports of deeper analysis including the number of unsuccessful applications, number of audits, issues that occur, budget spent.</p> |

We also ask that clarification be issued on the 'waiting list' that will be created if the budget for a financial year is spent before the end of that year. In order to join the waiting list will a full application need to be made? Does the waiting list get priority when the subsequent year's budget is open to applications or will a new application be needed?

As much real-time data that can be provided on the number of applications submitted, successful applications, budget spent, and budget allocated-but not yet spent, is vital to creating an engaged, supportive supply chain.

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?

For quarterly reports figures such as the number of applications received and approved, technology type, complaints, audits undertaken, budget spent, budget allocated and remaining budget, numbers of applications on the waiting list (if applicable).