

## 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:	ECA
Organisational Type:	Trade Association
Completed by:	Luke Osborne
Contact details:	<div style="background-color: black; width: 200px; 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

<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. The installers are best placed to <b>verify</b> if the system that is listed on the Energy Performance Certificate (EPC) is still the current heating system. However, a better practice would be for a portal to be developed for the building owner to self-certify relevant information and then for the installer to verify this against a checklist that would be generated by the portal. The heating system (and other energy efficiency aspects) may have changed since the current EPC was conducted.</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>Although this is the current process for the Domestic Renewable Heating Incentive (DRHI) and installers of heatpumps are already acquainted with this process, with a large cohort of new heatpump installers being required and trained to undertake these new works, the tools and guidance must be provided to ensure that this is as straight forward as possible. Verification via a national database would be a sensible approach and ECA would expect this information to sit on the <a href="#">Planning Portal</a> for more recent self-build buildings. An Application Programming Interface (API) to this information would ensure verification was simple and automatic. Alternatively, homeowners could be offered a portal, (independent of the installer) to upload relevant documents to ‘self-certify’. The installer would be sent an automatic notification</p>

	when these are verified and the process able to progress. This would reduce the time spent by installers in chasing the home-owner for information.
3.	Is there any other evidence we should request to prove that properties are custom-build? ECA doesn't believe there is any additional evidence required. As outlined in our response to question 2, the process must be as straightforward as possible for the installer.
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. Guidance may be needed on how an installer verifies the status of a property. There may be tenants who try to pursue the Boiler Upgrade Scheme (BUS) option who are unaware of the limitations and the alternative route through the Social Housing Fund. Using a home-owner portal to self-certify and provide relevant documentation as per our response to question 2 would be a preferred approach.
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, it would be easier to link the application process via an API. But as highlighted in our response to question 1, there may have been changes to the property regarding the heating system and other energy efficiency measures since the EPC was conducted. It would not be a reasonable use of time nor funds to insist that a new EPC be conducted to take into account these additional measures, as the EPC would be outdated once the heat pump was installed. Therefore it would be prudent for the homeowner to have the option to upload additional evidence to support the improvements, via the portal proposed in response to question 2.
6.	Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why. Disagree. Regarding 2.12 There is a danger the customer fails to install the insulative measures within the set timescale (3 months for ASHP and 6 months for GSHP). The installer may end up forfeiting pay for their work or experience significant delays receiving payment. Suitable protections must be in place to prevent the installer from being penalised in these circumstances. There cannot be a repeat of the payment delays experienced during the Green Homes Grant scheme and the Office for Zero Electric Vehicles (OZEV) Electric Vehicle homecharge Scheme (EVHS). The poor execution of these schemes has led to installers being wary of taking on work funded in a similar way..
7.	Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system? As the installations must be compliant with Microgeneration Certification Scheme (MCS), the product eligibility list (PEL) must be identical to that within the MCS installation database for applicable products. To assist installers with a single point of reference, it is recommended the MCS installation database replaces the PEL as the point of reference and selection.
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. The installer can verify on their documentation that there is a current gas grid connection. This should be simple (ie a tick box) and only to verify information the homeowner has provided through a self-certification process on the portal suggested in response to previous questions.

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.			
Installers may be unclear whether a property is in a rural or urban area. ECA recommends the location is identified via the postcode in the self-certification process on the home-owner portal previously proposed. This should not be a requirement for the heatpump installations as is only pertinent for applications for biomass boiler installations.			
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.			
In table 6, the following line is not useful and could be confusing. Suggest incorporating information into the header:			
<b>All heating system types</b>	Relevant parts which are not excepted components	Not heat generating components, ie not relevant parts	Relevant parts which are excepted components
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.			
ECA agree with the proposed 'authorised signatory' . But suggests widening the term to include designated persons and titles that may be used by a sole trader or small business.			
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?			
A simple document co-signed by the building owner and the installer covering the decisions made and that the building owner has agreed to proceed would be adequate. This could be conducted via an 'app' on a tablet, which could link into the proposed portal. It may be pertinent to have a customisable template for installers to use. This would make it easier for the validation process.			
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.			
A simple document co-signed by the building owner and the installer covering the decisions made and that the building owner has agreed to proceed would be adequate. This could be conducted via an 'app' on a tablet, which could link into the proposed portal. It may be pertinent to have a customisable template for installers to use. This would then make it easier for the validation process.			
15. Do you agree or disagree with the 7 days for property owners to provide consent? If you disagree, please say why.			

	<p>Whilst it is acknowledged that this is to provide additional consumer protection, it would be more straightforward if this consent is obtained by the installer at the time of the visit to the premises. The homeowner could then be afforded 7 days to retract their consent and halt the application process via the portal.</p>
<p>16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?</p>	
<p>ECA is concerned that due to the limitations on the number of vouchers to be issued within a budget allocation period (3.41) installers may end up in a position where they have invested time and money carrying out the assessment and quotation for the client, only to find they are unable to have a voucher approved due to the above limitations being exceeded. Will installers be notified when the budget allocation is nearing saturation? Will they be recompensed for their investment of time and money should the client then not have the installation due to lack of voucher availability? Will the voucher not claimed in this instance be deferred until the next budget allocation period, i.e. being at the 'front of the queue' for the next budget allocation?</p> <p>There are issues with the budget allocation periods potentially leading to peaks and troughs for installers, which will not only impact installers but also supply and logistics chains.</p>	
<p>17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.</p>	
<p>ECA support the voucher scheme but emphasise that the application process must be as straightforward as possible. We, therefore, urge the use of a portal for the building owner to be able to upload required documentation and to self-certify, with the installer then verifying relevant criteria during the visit. Without this, there is an undue burden on the installer, whose time would be better spent 'installing'. It is also essential that the body responsible for managing the scheme is suitably staffed and trained to facilitate the administration of the scheme. This would ensure there are no significant delays to the process of applications, nor delays to payments to installers as experienced during the Green Homes Grant voucher scheme.</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>ECA supports the voucher scheme, but emphasises that the application process must be as straightforward as possible. We, therefore, urge the use of a portal for the homeowner to be able to upload required documentation and to self-certify, with the installer then verifying relevant criteria during the visit. Without this, there is an undue burden on the installer, whose time would be better spent 'installing'. It is also essential the body responsible for managing the scheme is suitably staffed and trained to facilitate the administration of the scheme, thereby ensuring there are no significant delays to the process of applications, nor delays to payments to installers as experienced during the Green Homes Grant voucher scheme.</p> <p>Additionally, 3.43 is poorly worded. 'We will give installers no less than 14 days to comply with such a request...' could be changed to: 'We will give installers 14 days to comply with such a request.....'</p>	
<p>19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?</p>	

Agree. Weekly payment cycles are appropriate to ensure that installers are recompensed promptly.
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. The property owner must be made aware of this, although there should be clarity of what an audit may entail. The property owner should be informed that audits aid in reducing fraudulent claims and ensure that works are conducted to a required standard.
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
Withholding payments should be the last resort. Where there are shortcomings with the installation or required actions (such as additional insulation measures), then the installer and the homeowner (where applicable) should be assisted in rectifying any non-conformities first. It will be essential that any investigation is conducted swiftly so that the installers are not inconvenienced or financially aggrieved.
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
As outlined in our response to question 21, offsetting and requesting repayment of payments should be the last resort. Where there are shortcomings with the installation or required actions (such as additional insulation measures), then the installer and the homeowner (where applicable) should be assisted in rectifying any non-conformities first. It will be essential that any investigation is conducted swiftly to ensure that the installers are not inconvenienced or financially aggrieved.
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
ECA agree that the installer should have a right to 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.
Due to the limitations in annual funding under the scheme and to enable clarity in the availability of vouchers ECA would encourage monthly reports to be published. This will also aid in the visibility of how well the scheme is working and highlight any administrative issues.
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?
It would be useful for the report to have a breakdown of the geographical deployment of installations, what technologies have been deployed, the type of building they have been installed on, the number of applications submitted and the number of applications approved. The report should also detail the amount of funding remaining within the funding period. It would be useful to include the number of current disputes and identify the main reason(s) for the dispute. This will help installers to identify where there may be misunderstandings or installation-specific issues and to help iron out potential issues.