

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:	ALTO ENERGY LIMITED
Organisational Type:	INSTALLER
Completed by:	SCOTT GREENING, MANAGING DIRECTOR
Contact details:	[REDACTED]
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>We agree. You need to include an option for “no heating system”.</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>We disagree. Proving status as a custom build is a complex area and installers should not be party to it or liable in any way. Installers should simply state on the application form that the property is a “custom build”, the voucher status should then go to Pending whilst Ofgem contacts the end user directly to satisfy the custom build criteria.</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>

As per our answer to Question 2, I do not think this should be the installer's business.
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.
We disagree. The end user should declare on a standardised form that the property is not social housing. Liability should be with the end user, not the installer.
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.
We agree.
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
We agree generally, however if the customer is not able to get insulation this should be covered at voucher approval stage not redemption stage. Otherwise it places a lot of risk on the installer than the evidence for the exemption is going to be satisfactory. This should ideally be obtained before the works commence.
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?
No, MCS alone is enough. Please please please no new apps like Sightline which was used under the Green Homes Grant Scheme, that was a nightmare.
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.
No comment, we have no vested interest in Biomass.
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.
No comment, we have no vested interest in Biomass.
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?
No
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
Agree
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
Agree
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
If the scheme has run out of funding it should be up to Ofgem to confirm this to the homeowner.
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
Disagree. I think it's unacceptable that a scheme is being setup to be so stop/start if funding amounts are breached. This industry needs continuity, not another stop start scheme.

18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
Agree
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
Agree, but it cannot be any slower.
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, however we believe Ofgem should produce standardised forms for homeowners to complete. Installers when they all use the same official forms, which will make life easier for everybody.
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
Agree generally, however withholding payment should also be a last resort and Ofgem must work constructively with the installer to resolve any issues. This means explaining the non-compliance, the steps the installer must take and a reasonable time frame for doing so.
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
Agree generally, however withholding payment should also be a last resort and Ofgem must work constructively with the installer to resolve any issues. This means explaining the non-compliance, the steps the installer must take and a reasonable time frame for doing so.
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
Agree
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.
Monthly. It's important for installers to be able to keep up to date and advise customers accordingly.
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?

Number of applications per technology, both approved vouchers and redeemed.