

## 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:	Kensa Group Ltd
Organisational Type:	Heat pump manufacturer and installer
Completed by:	Dr Manju
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

1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.
Yes, we agree that the EPC document will be the suitable document to provide evidence of the existing heating system.
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.
It is true that it would be better if installers are being part of evidence providing exercise regarding custom build properties similar to existing building eligibility evidence process. It will provide confidence to installers on selecting the eligible property type. However, it will depend on the document type that will be required as part of evidence providing process, like providing a council bill will be suitable but asking to get access to title deeds will be a difficult one.
3. Is there any other evidence we should request to prove that properties are custom-build?

No Comments	
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.	Yes, we agree that social housing is defined based on section 68 of the Housing and Regeneration Act 2008 in this boiler upgrade scheme.
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 fully appreciate the use of API to validate the property owner's EPC unique reference number with the EPC data. This will help installers as well to know any issues at the very beginning of the application process and thus will be supporting installers in verifying the eligibility criteria.
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.	We agree that evidence is required to get the insulation exemption, however, we would like to know if such a letter of confirmation has to be a fresh one or would it be possible to make use of an older letter or previous report stating the exemption class? Use of older or previous document will save money on collecting evidence providing document.
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?	Nothing to add as all the significant and industry standards are being considered as part of the evidence process. However, we would like to have a confirmation from Ofgem on MCS umbrella scheme installer's eligibility as certified installers to apply to Ofgem for a voucher.
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 Comments
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 Comments
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.	

We fully agree with the classification of parts that can and cannot be used before the heating system is first commissioned. We appreciate that BUS is allowing the staggered commissioning of GSHPs attached to a shared ground loop (SGL).	
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.	
	Yes, we agree with the "authorised signatory" requirement as long as multiple users can be added to accounts to allow installers to align tasks in relation to managing vouchers with their existing business practices.
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.	
	We agree with the proposed sets of user permissions to a large extent but we understand that these significant layers of account management, will need a dedicated staff to manage the account activities.
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?	
	The proposed information collection from the quote will certainly help to reduce the speculation and will provide assurance to the property owner. However, the requirement for installers to retain a copy of the quote related to the application for at least six years will increase the document management task.
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.	
	We think that the proposed approach to obtaining evidence of property owner consent will add additional administrative load on the installer to get the online consent form done accurately. It is highly likely that the IT skills of property owners for poorly insulated houses might be very least and even be using their email ID for the first time. The requirement to respond to the consent form within a 7-day period will add enormous pressure on the installer to get it done on time.
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.	
	As mentioned in Q15, a time period of just 7 days will add enormous pressure on installers to get the online consent form done accurately, especially for installers with a large number of customers. This time period must be at least refined for offline routes.
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?	

<p>No additional information is needed to add to boiler upgrade voucher notification. However, we would like to understand if the installers are able to use the previously submitted document to resubmit a new application to Ofgem, for the same installation where the voucher has expired the validity period or do they need to make a complete new application?</p>
<p>17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.</p>
<p>We understand that Ofgem will issue a BUS voucher on the basis of first come first serve based on each quarter or annual budget allocation for each technology type. And will not be able to issue a BUS voucher where doing so would exceed the budget allocation, which will put the installer on queuing mechanism. And hence, we would like to have a clear communication from Ofgem to industry/installer of any change of budget allocation at every stage of application, this will become very important in order to make scheme effective.</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>Yes, we agree with the voucher redemption approach. Use of API will be very useful for providing evidence against the voucher redemption process.</p>
<p>19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?</p>
<p>Yes, we agree with the weekly payment cycles.</p>
<p>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.</p>
<p>Yes, we agree that installers should be required to inform property owners about the possibility of audits at the application stage. Owners will be informed that audits can take place at any point including before and after grant payment.</p>
<p>21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.</p>
<p>Yes, we agree with the proposed administrative approach of withholding one or several payments depending on the case and the associated risk factors.</p>
<p>22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.</p>
<p>Yes, we agree with the proposed administrative approach to repay the monies directly or to offset wrongful payment against future payments to installers.</p>
<p>23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.</p>

<p>We agree with the proposed administration of the right of review in order to provide a means of appealing a decision to reject voucher applications, to revoke vouchers, to require repayment and to offset payments. However, we would propose to include industry experts along with someone within Ofgem to review the original decision.</p>
<p>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>
<p>Frequency of publishing quarterly and annual reports should be sufficient, however, any changes in available budget must be informed to the industry as promptly as possible.</p>
<p>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?</p>
<p>No comments</p>