

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

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| 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. | |
| Organisation Name: | Abode Heat Ltd |
| Organisational Type: | Limited Company |
| Completed by: | Ben Hodges |
| Contact details: | <div style="background-color: black; width: 100%; height: 1.2em;"></div> |
| Confidential response: | Yes <input type="checkbox"/> No <input type="checkbox"/> Partially x <input type="checkbox"/> Anonymous <input type="checkbox"/> |

Questions on the proposed administration of the Boiler Upgrade Scheme

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| 1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why. |
| <p>Agree. We are not yet clear on the EPC eligibility. We recommend that if the confirmation of existing heating system is on the EPC and that it confirms the cavity/roof insulation requirements, then you do not put an age limit on it (as per the 24mth RHI rule).</p> <p>If the EPC online confirms it, then the application form should just be a tick box to confirm this can be verified from the EPC directly by Ofgem, not us downloading and send a PDF copy. This should be sufficient verification of existing heating.</p> <p>We collect survey photos as part of our survey process which could be included with application. BUT, do not recreate the Green Grant Sightline app to submit verified photos. It was terrible. Needed a live connection. Many sites are rural and have no mobile signal. No verification that anything had been received once submitted.</p> |

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| 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>Disagree. The custom builder should sign a declaration that the project is a custom build. Copy invoices that are currently used for RHI could be used but this would add significant admin overhead to us.</p> <p>Proposed VAT refunds are only applicable for new build (and a lot of projects are renovations at 5%) and will not be available until much later in project when they have completed the full build. Council tax bills will also not exist for new builds or renovations of derelict buildings. Neither of these options would work.</p> |
| 3. Is there any other evidence we should request to prove that properties are custom-build? | <p>Maybe use the planning permission reference? This is verified on Planning Portal and we could get this reference.</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>Disagree. How would this be done? No proposed options. Recommend customer declaration only. I don't think this is an issue. A tenant is not going to spend £10-15k on upgrading heating system on house they rent.</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>Agree. We do not want admin burden of downloading and forwarding EPC that already exist on .gov website</p> |
| 6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why. | <p>Agree. Get the EPC from your API. Letter from surveyor etc fine. Please confirm that any EPC that states cavity/roof "insulated (assumed)" will be considered compliant.</p> <p>Is there a minimum level required? I have not seen any requirement. You should accept a minimum level and not require upgrade of existing to current levels as this may be difficult to do on certain buildings.</p> |
| 7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system? | <p>Agree most points. But, what is the purpose of the PEL? If the heat pump is MCS certified then that should be all you need.</p> |

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| 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. |
| N/A |
| 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. |
| N/A |
| 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. Is there any detail on if any works can start prior to the application being received/approved? |
| 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. |
| Partially agree. The "authorised signatory" should be able to provide "full administrator" rights to another user. As a director, I am happy to be responsible, but I do not want any part of the day to day admin/setting up other user in the company etc. |
| 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? |
| Partially disagree. We are already heavily regulated via MCS and RECC code on compliant proposals, contracts, system performance estimate etc. However, to minimise speculative applications the homeowner must also submit their consent |
| 14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why. |

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| Agree. This will also ensure the installers are not registering speculative voucher applications. |
| 15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why. |
| Disagree. This should be 14 days. The application process should not be terminated just because an email was missed in a junk folder, they were on holiday etc. Also you need to factor in the paper option. Many customers are not particularly IT literate and the assumption by government bodies that everyone should just electronic platforms is wrong. |
| 16. Is there any additional information that you think should be included in the boiler upgrade voucher notification? |
| No. |
| 17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why. |
| <p>Partially agree with all proposed notes BUT, there is no mention of any SLA for applications. There must be an SLA for approval if all required application information is received. Homeowners and industry cannot have a repeat of the GHG disaster. 6months plus for voucher applications.</p> <p>Installers must have some certainty on timescale to manage an already disrupted manufacturing supply chain and limited installation engineering resource.</p> <p>Ofgem must resource sufficiently for 1st April. We have a long list of customers who were denied the opportunity of the GHG who will contract as soon as BUS launches. Also we have had to incentivise customers to wait for the BUS, again due to lack of available equipment and /or installation resource to otherwise deliver their project via RHI.</p> <p>We fear that there will be a large volume of applications immediately, which results in huge backlog of application, and we will not be able to install anything for 3 months plus. Clearly that cannot be cash-flowed but most businesses in this industry.</p> <p>The application team must be resourced from day one to ensure this backlog can be efficiently processed, not starting with a small team that you then expect to grow later in financial year.</p> <p>The fact that you have an annual cap means that there will be demand from April to Dec to gain vouchers and to redeem.</p> <div style="background-color: black; height: 50px; width: 100%;"></div> |
| 18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why. |

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| <p>Partially agree. There must be an SLA for redemption approval subject to all information being submitted. This should be no more than 5 working days and then payment automatically added to next proposed weekly payment run.</p> <p>Most of the information listed in 3.42 you will already have and should be automatically included in the portal. Do not make us re-submit information you already have and should be embedded within issued voucher. Yes use API to get MCS/MID info.</p> |
| <p>19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?</p> |
| <p>Agree. I assume you mean 5 working days, as per answer above.</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>Disagree. Scheme T&C's should be published to property owner as part of the declaration email link. The owner declaration should include statement that they have read and understood them including audit.</p> |
| <p>21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.</p> |
| <p>Disagree. Where Ofgem decide to withhold payment, this needs to be within a much shorter timescale than 14 days. As per my answer to Q18, this suggests that Ofgem are proposing a 14-day redemption confirmation and then further time to administer payment which is far too long.</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>Disagree. Installers should repay money where applicable, not have payments offset against other projects as non-compliance may be fault of property owner, not installer.</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>Disagree. 14 days maximum for review 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>Weekly. The system should be automated with published PDF report and/website graphic. Presumable the processing system is live so all data can be updated with daily applications, vouchers issued, redemption and remaining budget.</p> |

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| <p>This is critical 3rd party information that we can share with potential customers to ensure they understand any order and installation timescales are based on Ofgem verified data.</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>Regional breakdown. MCS used to do this provided a really useful industry insight. Including technology installed, displaced fuel and estimated carbon savings based on accurate CO2 kg of displaced fuel v accurate current grid electricity (is this now to be used in SAP10, not the current outdated figures)</p> |