

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:	Policy Connect
Organisational Type:	Cross party think tank
Completed by:	Laura Fatah, Verity Winn, Rein de Loor, Oona Muirhead
Contact details:	<div style="background-color: black; width: 100%; height: 40px;"></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>Agree. It is logical for the installer to do this, as they will have the technical expertise and will gain familiarity through carrying out this function on a repeat basis.</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>Agree, provided that all installers must seek from the homeowner is proof that a new build home is a custom-build, and that it has a boiler eligible for low-carbon replacement. It would be unfair to expect installers to provide design details about the property, which could be assumed from the question. If detailed design evidence about the property is required, this should be the responsibility of the owner. Installers should not be held accountable for errors or omissions that the homeowner may have made when explaining the design of the home.</p> <p>As the consultation acknowledges, each custom-built home will be different. Therefore, if the installer has to provide in-depth evidence about the house, they will have to access technical</p>

data from the homeowner which – not being builders or architects – they may not be in a position to understand. The installer will essentially be acting as a conduit between the homeowner and the authority. It appears more logical for the homeowner, who will ultimately benefit from the scheme, to provide information about the house which will be nature be detailed and unique. Furthermore, homeowners may not wish to share these details about their property with installers, and it is unfair for installers to be held accountable for errors or omissions that the homeowner may have made when explaining works which have been undertaken many years ago. It may be necessary to seek further evidence and obtain copies of paperwork etc. which the installer cannot do, as these are personal to the homeowner.

However, these problems could be overcome if the data that the installer needs to provide is solely about the boiler to be replaced, or confirmation of homes' custom-build status in the form of pre-existing information. The consultation is not clear on this point.

3. Is there any other evidence we should request to prove that properties are custom-build?

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.

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.

- 6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.**

Disagree. At present, planning departments in local authorities do not have sufficient capacity and funding to take on a responsibility of the scale described. According to Historic England, there are approximately 400,000 listed buildings registered in the UK, not to mention buildings in conservation areas and with other exempt features. It is important that local authorities are involved in heating decarbonisation, as the trusted partner of homeowners and the body with relevant information regarding the UK's housing stock. To empower local authorities to take on the role described, government should assign local planning departments funds for additional capacity.

Similarly, as a charity, English Heritage will require additional capacity and funding from government to take on this expanded role. Complicated and lengthy processes could deter owners of listed buildings from accessing the Scheme, particularly for heritage property owners who already have additional compliance and conservation processes. This could be ameliorated by recognising the different grades of listed buildings, and by allowing owners of Grade I-listed buildings greater lenience in providing evidence for insulation exemptions. To

make the scheme accessible to owners of such properties, the letter template and proof of qualifications required by Ofgem should be straightforward and not inordinately time-consuming to complete.

Finally, in relation to the exemption due to the construction of the building, this should be road-tested to ensure that the requirement to set out why it is not structurally possible is not too onerous and narrow. It has been shown that a number of rural buildings, for example stone buildings, are very suitable for low-carbon alternatives such as heat pumps without intrusive insulation that may be unaffordable and can give rise to downstream problems such as damp. This criterion should be reviewed depending on the EPC ratings that will be required for eligibility.

7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?

Carbon monoxide emissions from biomass boilers should be considered as a risk, and guidance about installing a carbon monoxide alarm with a biomass boiler should be extremely clear.

In relation to low carbon, it is vital that any form of biomass heating systems and fuels used are properly certified as low-carbon. There is a risk that the use of biomass boilers perpetuates greenhouse gas emissions if unsustainable forms of solid fuels are used. Further regulation and requirements are needed for the use biomass heating systems to become a truly net zero option, particularly in relation to where and how the fuels are sourced and cultivated. As the Energy Saving Trust indicate: "The carbon dioxide emitted when wood is burned is the same amount that was absorbed over the months and years that the plant was growing. The process is sustainable **as long as new plants continue to grow in place of those used for fuel**. There are some carbon emissions caused by the cultivation, manufacture and transportation of the fuel, **but as long as the fuel is sourced locally**, these are much lower than the emissions from fossil fuels."

Further impact assessments are required to determine the long-term environmental impact of using biomass boilers and importing biofuels from abroad, as well as on the UK's agricultural sector and biodiversity from increased bioenergy cultivation.

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.

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.

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.

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.
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.
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?
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
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 seems quite a short period of time, and is not adequate if the owner is absent when the email arrives from Ofgem or the phone call is made (for off-line applications). We suggest it be extended to perhaps 30 days then this might improve the chances of an application being successful and avoid repeat applications.
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.

<p>Agree, subject to the voucher having an adequate (not too short) end-date. Installers have the expertise to go through the application process, which individual homeowners may find cumbersome and off-putting. Issuing the voucher to the installer will allow the installer to plan their future workload. However, the voucher validity date needs to be sufficiently long to allow the work to be done. A key lesson from previous schemes is that the voucher validity date was far too short. Extending the validity of vouchers would go some way towards providing the certainty installers require to make substantial investments of training and work into the Scheme. Experiences of the Green Homes Grant have badly damaged installer confidence. It is important that, if installers are to be responsible for applying for vouchers, they have a guarantee from government that they will be able to redeem vouchers for work completed in any circumstances.</p> <p>Installers being deterred from the Scheme may exacerbate inequality and hinder the levelling up agenda, as those homeowners who are unable to pay and are relying on the scheme could struggle to find installers willing to use the scheme over taking on a job with lower administrative requirements, greater certainty of payment and swifter provision of funds. (N.B. It is unclear why BUS payments are being described as Upfront Grants when they are processed after completion of works).</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>As above.</p>
<p>19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?</p>
<p></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>Agree, provided that the message is changed so that it is clearly about Ofgem ensuring the quality of the installation and the competence of the installer. Homeowners will be reassured that Ofgem will be monitoring the quality of installation. As we set out in our report <i>Uncomfortable Home Truths</i>, lessons need to be learnt from previous schemes such as the condensing boiler switch. This showed that consumers were very concerned about installation quality, which caused a huge draw on the roll-out of the switch, until better checks were put in place on the competence and quality of installers.</p>
<p>21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.</p>
<p></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>Please see answer to question 17.</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>Very much agree that installers – who will rightly be held accountable by Ofgem for their competence – should have the right to appeal. Ofgem must take this duty seriously and properly investigate appeals.</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>Quarterly and annually as proposed seem appropriate.</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>Number and value of vouchers issued, number of applications successful and refused, number of applications redeemed and not redeemed, number of live investigations, number of payments withheld, repaid and offset and reports of complaints to Ofgem.</p>