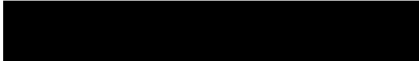


## Template for response to “Administration of the Boiler Upgrade Scheme” consultation

<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:	n/a
Organisational Type:	n/a
Completed by:	Sean Durney
Contact details:	
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>Disagree – I do not believe there are enough qualified MCS installers to cover the administration element of this programme, which in its current form is complex and bureaucratic and risks failing for the same reasons as the previous Green Homes Grant scheme.</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>The definition of ‘custom build’ is not clear enough – are small scale property developers permitted to apply multiple times for the grant? Given that green improvements add value to properties, the system risks being gamed to improve selling prices. This is not good use of public funds.</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>

<p>The homeowner's status should be ascertained. Landlords of multiple properties should not be prioritised for support over single home owners.</p>
<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>
<p>I'm not sure what the required evidence is from the document.</p> <p>There should be a separate scheme to improve social housing.</p>
<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>
<p>The description of an API is not sufficient in the document to explain how this would be undertaken.</p> <p>The scheme as described appears to have the same flaws as the Green Grant programme – requiring significant administration relying on installation companies that may not have sufficient capacity to undertake the required administrative tasks, or bear the financial risk. The timeframes are too short and offer risk to those companies.</p>
<p>6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.</p>
<p>The qualification for ascertaining the status of insulation needs to be clarified.</p> <p>There needs to be a holistic approach to older properties and the practicality of retro fitting. There is some evidence that cavity wall insulation is counterproductive and can cause damp in certain properties. It should not be an essential element for eligibility. Is it certain that there are enough qualified persons to make these assessments and a consistent standard for them to work to?</p>
<p>7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?</p>
<p>The potential carbon saving should be calculated by a surveyor/qualified person at the start of the project to ensure undertaking the work is worthwhile.</p> <p>Powering the heat pumps with renewable energy should be prioritised/included as a condition of contract.</p>
<p>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.</p>

I'm not sure what the is supposed to achieve. Biomass boilers are not necessarily low carbon. Why would this be prioritised over a heat pump in a rural area? Surely, heat pumps work just as well in rural areas?
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.
As per previous, I can't see why biomass boilers would be prioritised in rural areas over heat pumps as they are more carbon intensive. Why is a distinction being proposed?
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.
Disagree – Solar photovoltaic parts should be included.
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.
Company eligibility will be difficult to administer. Due diligence should be undertaken to ensure disqualified directors are not taking advantage of the scheme. Companies in administration (or in financial difficulty) should not be eligible.
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.
I didn't think this section was very clear, so cannot comment further.
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?
There needs to be some price controls introduced so that unscrupulous companies don't get paid both by the owner and the grant for the work. Home owners should provide evidence of payment directly to the scheme, with itemised bills. All companies involved should go through an approval process.
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

<p>I think there's an issue of authenticity and fraudulent selling becoming an issue. Too many companies claim to be 'government backed' when selling eco solutions. How will this be managed?</p> <p>Homeowners should be provided with itemised bills showing material and labour costs. This could include an admin/management fee.</p>
<p>15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.</p>
<p>I think this is a short timeframe that will cause issues for some people.</p>
<p>16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?</p>
<p>Minimum standard for installation. Approved supplier companies. Itemised bills including management fee costs.</p>
<p>17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.</p>
<p>As per previous comments – I think the proposals are complex, the scheme does not solve the issues of the past scheme and may be open to mistakes, fraud and low take up.</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 previous</p>
<p>19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?</p>
<p>This will be an onerous administrative task - is the capacity in place to deliver the scheme without delays?</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</p>
<p>21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.</p>
<p>Does this put the homeowner at risk of part completed installations?</p>

22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
How does this protect the homeowner?
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
Who bears the risk in this case? If an installation is of low quality, how is the homeowner protected from having to pay for repairs/upgrades.
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.
Every month - will quickly show take up and progress.
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>Amount of carbon saved.</p> <p>The VAT situation is not explained well at the moment – is the grant net of VAT?</p> <p>Final Note – I don't think this scheme properly or fairly addresses the need to install low carbon heating in UK households. Whilst the issue for most people is capital expenditure, the thresholds of the scheme will not be suitable for the poorer households. Even middle-income householders might struggle to pay the balance of the installations.</p> <p>A better solution needs to be found that doesn't necessitate the householder buying the heating system outright or necessarily owning it, and payment being taken from regular energy bills over a longer time period.</p> <p>In the meantime there should be tax reductions for energy efficiency measures undertaken in existing properties (as happens in Germany), a stronger focus on insulating domestic properties, a quicker moratorium on fossil fuel heating systems in new homes and more support for training programmes for heat pump/solar installers and surveyors/assessors.</p>