

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

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:	Birdshill
Organisational Type:	Installer
Completed by:	Nick Cater
Contact details:	
Confidential response:	<input type="radio"/> Yes <input checked="" type="radio"/> <b>No</b> <input type="radio"/> Partially <input type="radio"/> Anonymous

## 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.
Agree this seems straightforward I am not sure why you have relaxed the rules on EPCs when a more recent EPC will give a more accurate reflection of the home including heating system in place...
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.
Disagree Evidence here could get really messy and I would in this case get the homeowner to upload as part of their confirmation of the application rather than channel this via an installer.. as I understand it the homeowner could move the voucher to another installer so putting the onus for this element on the installer who allied for the initial voucher seems incorrect
3. Is there any other evidence we should request to prove that properties are custom-build?
non that I am aware of
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 agreed but also confirmed by the homeowner.

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.
Agree - surely just in the same way that the DRHI does now...in fact you could simplify this greatly (in my view) by utilising / adapting that system as that is for the same requirement and exemptions
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
Agree but what introduce new criteria here, again please just follow the way in which the DRHI is administered, the templates already exist and the process is clear, tried tested and working. So why introduce something new: "We will require confirmation of the qualifications and chartered status of the surveyor and/or ecologist who provides the letter or report. "
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?
The PEL has proved to be a large and problematic database to navigate and therefore I would suggest that the MCS certificate will be sufficient. So at the point of application if the installer inputs the MCS number of the proposed product then this is confirmed post installation (by the installer) there must be scope for changes (different products as these can change due to supply issues and if the voucher application has to re-start because the product has changed there could be big problems therefore the voucher application (in its entirety would need to be rechecked/ submitted at the end) this is really important based on our experience with 000's of customers on the DRHI.
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.
Agree
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.
Disagree - I believe that the installer should be required to make the declaration... this could be checked by the installer on the ONS database or by Ofgem
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?
<p>At this stage I believe you should require a detailed MCS qualifying quotation for the job. Also that this has been signed by the client. The client confirmation would be straightforward then in that you simply need for the homeowner to confirm the quote. There should also be an EPC for the property at this stage.</p> <p>There is a great risk that large companies with call centres etc will develop systems to assume all of the available vouchers (talk diff issuing in tranches) and thereby monopolising the scheme. As a guiding principle the voucher should only be applied for/ approved when the client has agreed a quotation. This will reduce unnecessary admin on speculative voucher applications and (greatly) simplify the process.</p> <p>Allowing provisional quotes at this stage is a mistake and the request for this will be coming from large businesses looking to "game"/ monopolise this scheme. These will have the highest overhead to manage and represent the greatest risk of abuse and fair in the scheme.</p>
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

This is starting to look like a clunky process. Surely the application can be relatively simply done, in a similar way to the DRHI, where the property owner enters their details as the second step in the voucher application process. If you took the existing DRHI administrative software, duplicated and adapt it as follows:

- 1) Installer logs into BUS portal and starts an application and completes all the questions/ forms shown including the EPC number for the property,
- 2) The consumer provides a confirmation written, signed, online whatever as confirmation
- 3) installation is done and the installer completes the grant application
- 4) the consumer confirms that they have had work done and are happy with the work
- 5) grant is released to installer

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?

This should not be necessary as it should have been in the original application and therefore they are implicit/ should already be there

17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.

I do it seems unnecessarily complicated and open to abuse my companies logging large swathes of speculative applications, if you instead make the application something that is done at the point of sale i.e. with a signed MCS / RECC approved formatted quotation then the process will be much much more accurate....the greatest risk to this scheme' success or failure is the administration and the ultimate objective is not to issue vouchers but to reduce carbon in our heating systems.

18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.

Yes I do see above. The onus needs to be on the installer to present a customer who is committed to proceeding and has signed an MCS compliant agreement - a copy of this should be uploaded and evidenced and Ofgem could determine a format for this that is MCS compliant and consistent.

If you decide to ask installers to upload multiple documents that yo then want to manually review this will be a DISASTER. The existing DRHI scheme automatically looks top the EPC and the MCS certificate and triangulates the information needed to satisfy the scheme...

why add an emissions certificate on top of an MCS certificate?

19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?

agree

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

21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.

yes though this should all have been pre-approved so unless there is an issue that needed addressing (CWinsulation etc)

22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.

Requiring re-payments with a directors guarantee would provide a mechanism to prevent abuse of the scheme.

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 and to whom - we have an existing (small) installer industry and how this scheme is administered is a potential threat to that industry- I employ 12 people in a rural economy entirely focused on renewable heating systems and if Octopus Energy or some other "Aaving Britain money" call centre led type enterprise come along and assume all of the vouchers then we will not have a business. (I would hope that is not the objective of the scheme)

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?

Follow DRHI format has been well thought through and developed to keep industry posted etc.