

1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.

Agree – I understand that the information will be taken from the EPC.

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.

The installer will have to obtain this information from the customer. Could this information be requested directly from the customer when Ofgem request confirmation of consent?

3. Is there any other evidence we should request to prove that properties are custom-build? No

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.

The document is not clear on how we should prove that the house is not social housing.

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 – this seems to work well for the RHI

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

Agree – however, the guidance in table 2 says that a report from a chartered surveyor is necessary to outline structural features that prevent the property from being insulated. Suitably qualified architects may also be able to do this. It is common for architects to be involved in improving the thermal properties of houses, and in these cases it would seem unnecessary to involve an extra surveyor.

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

No

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 – I understand this will not be necessary for heat pumps

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.

Agree – I understand this will not be necessary for heat pumps

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?

No

14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.

Agree

15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.

Disagree – Some customers will miss the email and fail to reply in time. It would be useful if it is a bit more flexible. Maybe the installer could be copied into the email, so we can remind the customer, if they have not responded in time.

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.

We would prefer that the voucher is issued and redeemed by the customer and the payment is made to the customer, instead of the installer. There is a risk that we, the installers, could lose out on grant money because the customer fails to act as and when necessary. This was one of the main reasons for us being very wary of the green homes grant.

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

Agree – as long as the qualification criteria is clear and we can be confident that the applications are valid before we do the work. Withholding payments would cause significant cash flow issues, especially to small companies. The non-domestic RHI could take months to get through – such a prolonged application process would cause cash flow issues if we had several grants outstanding.

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

Agree – it would be problematic for small installers if payments took much longer than one week.

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.

We will do so, but I also agree with the plan that Ofgem will reiterate this (in writing) when you ask for the customer consent to issue the voucher. In my experience, customers do not remember everything they are told during a survey/sales visit.

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

Agree – as long as the qualification criteria is clear and we can be confident that the applications are valid before we do the work. Withholding payments would cause significant cash flow issues, especially to small companies. The non-domestic RHI could take months to get through – such a prolonged application process would cause cash flow issues if we had several grants outstanding.

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

Agree

23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.

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.

It would be useful to have monthly updates on the amount of budget remaining, so we can keep customers informed of the likelihood of them getting vouchers. When we do a sales visit/survey we will advise the customer of what they could receive, but will not apply for the voucher until they pay a deposit and sign our terms and conditions. At that stage the customer will be expecting to qualify for a grant.

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?

Further comments

Under the proposed application process it is possible to apply for a voucher before cavity wall insulation and/or loft insulation has been installed. These measures must then be done before the voucher can be redeemed. This poses a risk to the installer, because the customer may not get around to doing the insulation in time to redeem the voucher, thus preventing the installer from receiving the grant through no fault of their own. For this reason, we would not routinely inform customers that this is an option, and would always try to get the customer to install the insulation before we apply for a voucher and carry out the installation.

It would be helpful to installers if there was a process to claim the money back from customers if the voucher redemption fails due to the customer failing to fulfil their obligations under the scheme.

It is not clear what would happen if the installer installed the heat pump and redeemed the voucher when the house was eligible, but the owner subsequently makes changes to the house, rendering it ineligible – eg they install an additional heat generating plant, or remove loft insulation. If Ofgem were to then audit the house and find that it is ineligible, would the grant money be clawed back from the installer? How can we protect ourselves from this event and how could we obtain evidence that the house was eligible at the time of installation?