



Date: 26/01/2022

Elmhurst Energy's Final response to:

Administration of the Boiler Upgrade Scheme

Prepared for: OFGEM

1. Introduction

Elmhurst Energy are pleased that OFGEM are seeking a consultation on the 'Administration of the Boiler Upgrade Scheme' and as such we are delighted to respond to each question in turn.

The Consultation asked 25 questions and we have answered them all below. We hope you find the responses considered and useful for taking the Administration of the Boiler Upgrade Scheme forward in a progressive manner.

2. Summary

In summary, we support this exciting transition that the country needs and welcome the upfront capital grants to support insulation of heat pumps and biomass boilers. The three main points that we wish to make are as follows:

- A pre and post EPC should be fundamental to allow the scheme to be measurable. This would also offer consumer protection, building on the knowledge of previous RHI schemes.
- The use of Trustmark approved (PAS 2035) installers are needed to provide quality assurance to the consumer and to mitigate any unintended consequences of poor insulation work. Clarity on the requirements of insulation within the property is also needed.
- Alignment with Part L of the building regulation is necessary.

3. Questions and Answers

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

We welcome the use of an up to date and valid EPC carried out within a reasonable time frame (Our suggestion is up to 12 months) to evidence the existing heating system present within the property. This we believe is the only grounds to make good decisions on a whole house approach when looking at both the heating system and insulation requirements.



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.

No strong opinion.

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

No strong opinion.

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.

We agree with the proposed approach but recommend a central place for this information to be verified.

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

We agree where a house has evidence of a fossil fuel boiler and no recommendation for cavity or loft insulation.

What we feel strongly about is the need for a pre and post EPC to offer; consumer protection, to demonstrate both the carbon and cost savings and to analyse the impact on homeowners.

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

We agree and support this approach. We feel that clarity is needed regarding the terms of this insulation requirement, does it relate to just a true cavity wall construction and pitched roofs (with or without access to the loft) or does it include solid walls and flat roofs? Further clarity is required.

We also strongly recommend the use of Government endorsed policies such as PAS 2035, looking at a whole house approach. Thus helping to mitigate any unintended consequences of poorly insulated homes and any knock on ventilation effects such as condensation/damp. Our intention is not to stand in the way of local trades wishing to carry out the work but we do not want to bring the industry into disrepute when a solution is easily identifiable.

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

No strong opinion.

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

We agree, but would advise that Ofgem consider using both the current EPC and also any previous EPC's for that property that appear on the register to verify if gas has ever been used.

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.

No strong opinion.

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.

No strong opinion.

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.

No strong opinion.

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.

No strong opinion.

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 strong opinion.

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

No strong opinion.

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

No strong opinion.

16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?

No strong opinion.

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

No strong opinion.

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

We agree with this approach.

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

No strong opinion.

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 agree with this approach.

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

No strong opinion.

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

No strong opinion.

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

No strong opinion.

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.

Annual reports seem sensible, we refer back to our proposal of Pre and post EPC's to allow this to be measurable, offering consumer protection and to analyse the impact on homeowners.



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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?

As above - Annual reports seem sensible, we refer back to our proposal of pre and post EPC's to allow this to be measurable, offering consumer protection and to analyse the impact on homeowners. Ofgem could use the pre and post EPC to identify an estimate on how much savings have been provided by the scheme

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