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Please find on the following pages our response using the Template as requested

As we unfortunately find ourselves in another race to the finish of another Renewable subsidy – this time the RHI – we'd like to stress how difficult it is for Installers to adjust again and prepare to navigate a new scheme

We do however feel it is important to at least try and engage on these matters as we all ultimately want the Govts. plans for decarbonization to work so have spent considerable time that we do not have doing just that

The fact that the Ofgem consultation document points out that it is unlikely there will be further consultation & starts with.... installer needs to submit 2 applications doesn't bode well ?
We will have to carefully consider whether we decide to sign up to this one ?

I can't stress enough how damaging the GHGVS was on a number of levels and wrote to our local MP at the time
The response I received was less than satisfactory and it doesn't look as though much of the feedback on that has been listened to ?

It is encouraging though that Ofgem are to be the administrator but why is the RHI not just adapted to the new scheme rather than introduce 50 pages of new scheme ?
The criteria seems to be similar and the technology is the same so why not use the best bits and improve what's in place already

Administration of the scheme must also recognize the role of Installers as key and the work that is already involved in providing consumers with energy efficient heating (design, quality, training, compliance & safety) under our accreditation bodies.

Instead we are burdened with layer on layer of administration that could easily be centralized or linked to what is already in place.

Again one of the biggest flaws with the GHGVS was everything we have to do anyway under the standards to which we work had to be duplicated (and paid for!) again through Trustmark. The Sightline APP added another level of admin at the front end that we had no access to further down the line. Evidence had to be duplicated and loaded to different platforms. The "bodies" involved all need to work together cohesively

Installers must not be accused of wasting tax payers money when historically it is the schemes themselves where the waste is. The insurance companies, App developers, finance co's etc. etc. make money from these schemes but for the Installer there is no incentive – just responsibility, accountability & squeezed margins
Fast track Installers who consistently show full compliance and have a good H&S and Consumer Code record
Link everything together and make it simple

If these schemes are to work the layers of administration should be taken away from the Installer so they can maximize opportunities to install well designed, technically compliant quality products safely under regulated standards

Our response is largely in line that of MCS but have added a few details – we hope they are helpful?
With kind regards

Gaye Wilmot



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:	Solec Energy Solutions Ltd.
Organisational Type:	Ltd. Company – Installer of Solar PV, storage & Air Source Heat Pumps
Completed by:	Gaye Wilmot
Contact details:	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
Confidential response:	Yes <input type="checkbox"/> No <input type="checkbox"/> Partially <input checked="" 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>We agree with the MCS response on this especially with regard to burdening the Installer with layer on layer of administration – submitting essentially the same information to different bodies using APPs working independently from each other was a major issue with the GHGVS</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>This would be an example of an additional layer of paperwork – why can’t it be submitted to Ofgem directly by the homeowner – pre or as part of the application Referring again to the GHGVS – much time was wasted on the amount of non viable enquiries. Simple pre-qualifying questionnaires / tick lists would mean Installers can focus on Installing.... And cope with navigating a new scheme Consistency is much needed</p>

3. Is there any other evidence we should request to prove that properties are custom-build?	Agree fully with the MCS response
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.	Agree with MCS response
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 with MCS We are however concerned with the continuing varied quality of EPC's and how much information is assumed. Referring to the work involved in Designing a Heat Pump – Heat Loss Calcs are much more accurate Would welcome more dialogue on how EPC's could be improved to support Installers
6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.	Difficult to digest this section – complex and raises a number of issues. Need more time to comment fully
7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?	Agree with MCS response. In addition to what they say the Sightline APP was not accessible. information & evidence was "uploaded" and disappeared into the Cloud!? Then a different set of administration was required via Trustmark in addition to the requisite meeting of standards under our MCS accreditation. All "bodies" needed to support Ofgem in administering the scheme should all share the same information which Installers should only have to evidence once. Trustmark's communication and customer service was also less than satisfactory Why not base the new scheme on what's already in place with the RHI ? The application form is user friendly – Installers have got to grips with the process. Adapt it rather than waste tax payers money. Look at what went wrong with the GHG
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 with MCS – sounds like the administration is already Installer heavy

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.
Unclear – need to read and investigate further And yes utilise records & data already there
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 with MCS response – make it simple
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.
Again this is difficult to answer when we are not yet sure the practicalities of what's involved
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?
Sounds like more duplication?
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
Agree with MCS
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
Agree with MCS

16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
<p>Agree with MCS but to be honest the payment process is still a major concern Often Heat Pumps take months to install if part of a major refurb. Of a property Under the RHI we were able to accept deposits Smaller co's don't have the cash flow It's not really clear when the 5 day payment term starts ?</p>
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
<p>Ref. MCS comments – Voucher scheme in principle is OK Learn from GHGVS Can't vouchers be re-deemed as soon as the work starts ?</p>
18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
<p>As above – this all just sounds like the GHGVS Why can't the application process be more like the RHI application but in advance of the install rather than after. The quote could be uploaded initially instead of the MCS certificate. Then all the information is in one place - Ofgem could then allow Installers to access the information and add any other documentation required</p> <p>The practicalities of Installing Heat Pumps with the supply chain as it is, consumer demand and the expertise needed to install is not considered in an administration process burdening installers with more and more paperwork</p>
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
<p>Again its all a bit unclear but if payments to installers are going to be made after the application is successful that is good</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>No problem with any kind of auditing and yes this could help – clarity from the start will be helpful</p>
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
<p>Fine by us!</p>
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
<p>Again this is fine. The success of the scheme is equally dependant on quality of install as how it is administered. As long as the process is fair & works towards a resolution</p>

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.
Would look to MCS recommendation on this
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?
Ref. MCS recommendation