

Service charge legislation means that improvements cannot be charged for under the LTA. In order to improve efficiencies then allowance must be made for improvements on insulation etc. to be made via service charges.

Various but also Q34 - Heat network costs are mostly governed by energy prices. The level of commission energy brokers are permitted to receive should be limited first and foremost. In 2022 we had one energy broker taking 17p per kWh of electricity!

Generally speaking smart meter installations should be much more time specific. If boilers and/or lifts need to be shut down for the meter swap then this needs to be a timed event.

Table 3 would be time consuming and difficult to provide data for blocks of flats. This will add costs to the boiler works to comply with statutory reporting.

Pass through of costs needs be permitted for blocks of flats especially where these are not for profit and there is no-one else to pay for these costs.

Q15 – No – comparing chalk and cheese is of no use. A 1950s boiler vs a 2020 boiler is going to be vastly different. Further benchmarking takes time and labour which means additional cost.

For blocks of flats the price charged is the cost of the gas over the year and the cost of any maintenance and repairs. How this is comparable even between similar blocks is questionable nevermind over different areas and completely different blocks of flats.

Unbundling costs from service charges will just make an already complicated set up even more complicated with no benefit.

Under 4.33 – this information is just not known without employing consultants (more cost for the end user!) to try to find out. • network pipe length (metres) • annual network demand (kWh)

Q23-26 are not relevant for blocks of flats where there is no profit.

Q27-33 – the idea of benchmarking for individual blocks of flats is quite frankly absurd. You can't compare one boiler room to another in two matching blocks nevermind comparing between vastly different blocks and in different areas of the country. Plus it will add reporting costs which will result in higher costs to the end user!

