

Hi Will

I hope you are well.

I should be grateful if you would treat this as PEPA's response to your consultation on HTTC.

We will keep this brief:

1. PEPA broadly supports the increased rigour that you propose introducing for HTTC measures
2. Wherever possible duplication of activity in the process should be avoided
3. We feel it is unfortunate that this has become necessary – we would suggest accompanying these changes that severe sanctions are introduced in respect of any party found to be deliberately abusing the system (it is tantamount to fraud).
4. Ofgem should consider that the production of photographic evidence becomes routine in the verification process. This is the norm in the production of EPCs and increasingly for all residential surveying.
5. Ofgem should consider changing the rules in respect of the professionals recognised to verify measures. There are many other appropriately (and some might argue better) qualified professionals as well as Chartered Surveyors who could verify HTTC measures. These professionals could be included by a broader definition that encompasses 'competent individuals' and then goes on to specify the required qualifications.

We hope these comments are useful.

With kind regards

Mike

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