

## MCS Equivalence

Ofgem consultation on criteria for 'Equivalent' schemes to MCS for eligibility to apply for domestic RHI.

<b>Consultation Open</b>	20th March 2015	Each question within the Call for Evidence is listed below & has been separated by subject.
<b>Consultation Closes</b>	29th May 2015	
<b>Question #</b>	<b>Question</b>	<b>VG Comments / Evidence</b>
<b>Section 3 - The Consultation Process</b>		
3.1	Do you have any comments relating to the consultation process we have selected?	NA
3.2	Do you have any comments on the timescales outlined?	NA
<b>Section 4 - Guiding Principles</b>		
4.1	Do you agree with these principles?	
4.2	Do you have any comments on the principles outlined in this section, such as suggestions to make them more appropriate?	The objective of MCS or equivalent should be to get people to engage in renewable technologies. One of the guiding principles should be reducing complexity to ensure that the scheme is as accessible as possible. It should also be that all renewable heating systems should follow the same heating system sizing methodology to maximise performance, efficiency and carbon savings.
4.3	Are there any areas not mentioned that you feel should be covered?	Focus should be on the quality of the installation and we believe that both MCS principles and MCS equivalent principles should include a section regarding this. Focus should also be on simplifying the administration.
<b>Section 5 - Initial Proposals</b>		
5.1	Do you agree with our proposals on MCS equivalent criteria?	Yes, we agree with the proposals made for an MCS equivalent as these mirror current MCS. However, we believe that the current MCS framework is not suitable for the industry. For example, it would need to be able to demonstrate independence and impartiality and place the same expectations of compliance on each technology. For example, biomass is not currently subject to the same heat loss calculations/ system sizing methodology as heat pumps.
5.2	What additional criteria, if any, do you suggest should be considered?	MIS 3005 heat pump sizing methodology should be used for all space and water heating systems. All renewable heat technology should be subject to extensive field trial such as the energy saving trust field trial into heat pump performance. The quality of installations under MCS needs to improve to ensure maximum consumer protection - for example an MCS quality assessor/site inspector who is not qualified to install a product in compliance with MCS standard should not be able to pass comment on the quality of the installation/suitability of the product. Warranties should be the responsibility of the manufacturer/installer and not pre-defined by MCS. The warranty for the system should be the responsibility of the MCS installer and the warranty for the product should be the responsibility of the manufacturer to define. No warranty periods should be pre-defined by MCS. MCS007 product testing requirements should be replaced with European testing standards for ErP. Professional indemnity should be the responsibility of the installer (under RECC).

**Section 6 - Scheme Criteria Assessment**

6.1	Do you agree with our approach on assessment of criteria from a scheme claiming to be MCS equivalent? If not, can you suggest an alternative assessment process?	We propose that ErP product testing is accepted as an equivalent to MCS product performance testing requirements MCS007.
6.2	Do you agree with our proposals on the audit and verification of MCS equivalence by a scheme claiming equivalence?	
6.3	Are there any other aspects relating to the assessment of an alternative scheme's claim to MCS equivalence that you feel we should consider?	
6.4	Do you think that there are or should be alternative methods that equivalence to MCS could be demonstrated to Ofgem?	
6.5	What ongoing evaluation of an equivalent scheme do you think is needed and how often?	
6.6	Are there any additional points that you want to make?	One fundamental inclusion is that the scheme should be easy to administer and not complex, for example there are a number of duplications. For example, the product eligibility list (PEL) is in addition to the MCS certified product list . An equivalent would be an education/ certification similar to the Gas Safe model Currently there are no level 3/4/5 training courses for purely renewable designs. By ensuring that installers are educated to a certain standard/certification (similar to Gas Safe) this would reduce the complexity/ administration of each installation by an MCS installer.