

Domestic RHI applicants and
participants, renewable heat
installers and renewable heat
trade bodies

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Date: 25/01/2021

Dear Stakeholder,

Response following the open letter on the introduction of the 'Replacement Product Declaration Form'

The open letter dated 30 August 2019¹ outlined our interpretation and proposed operational approach when the renewable heat generating components(s) of an accredited heating system are replaced on the Domestic RHI. We proposed that the new Replacement Product Declaration Form is used, in order to help us determine the compliance of the heating system following such a replacement.

This document summarises the feedback we have received on the open letter, sets out our revised operational approach and introduces the declaration form we will use.

Summary of Open letter feedback

The open letter asked for any written feedback by 27 September 2019. We received three responses; one of them was from a Scheme participant, one from an MCS certified installer and one from a trade body. In summary:

- All responses welcomed the new operational approach, and did not object to our regulatory powers to request the completion of the replacement product declaration form;
- Feedback was received in respect to which heat generating components we identify as the product, under what circumstances we would expect a Replacement Product Declaration Form to be completed, and the terminology used in the form itself;
- Responses questioned how necessary it was to receive certain information on the Replacement Product Declaration Form and the scope of its use.

Ofgem's position

¹ <https://www.ofgem.gov.uk/publications-and-updates/open-letter-introduction-replacement-product-declaration-form-domestic-renewable-heat-incentive-scheme>

As explained in our open letter, we have continued our pilot programme with existing requests to change the products on accredited RHI installations. Ofgem continue to view the completion of the Replacement Product Declaration Form as sufficient and appropriate assurance that participants continue to comply with the Scheme regulations where the product of an accredited domestic plant has been replaced. Completion of the form is an ongoing obligation under the Scheme.

The form (and decisions made on that basis of its completion) will be implemented going forwards, subject to small changes to it and our interpretation of the heat generating components that constitute a 'product' (see ANNEX A). Those changes are:

- In the interests of clarity, removal of 'compressor' from the list of parts recognised as 'The Product' (as the compressor is contained within a heat pump unit itself) reflecting the fact that the compressor will be treated as part of the product;
- On the Replacement Product Declaration Form, requiring replaced 'product(s)' to be listed rather than individual 'parts' (product(s) are listed in Section 10 of the Essential Guide for Applicants);
- Also on the form, requirement of 'estimated annual generation' field to be completed will only apply to solar thermal plant (as this is the basis of RHI payments for that technology).. This is to streamline the form by requiring declarations that pertain to the technology- specific compliance of the plant.

The [Replacement Product Declaration Form](#) has been published on the Ofgem website, as well as guidance for those replacing any products that form part of their accredited heating system.

Whilst this process has been introduced to facilitate specific changes to accredited heating systems over the course of their tariff lifetime, we reserve the right to interpret comprehensive changes as amounting to a 'replacement plant'², and treat them accordingly.

This approach has been developed in response to administrative difficulties arising from the interaction between Microgeneration Certification Scheme (MCS) policy and the Domestic RHI regulations; any future legislative changes to the Scheme may affect Ofgem's current policy towards replacements on the Domestic RHI.

Yours sincerely,

RHI Policy team

² <http://www.legislation.gov.uk/uksi/2014/928/regulation/47/made>

[ANNEX A] Replacement Product Declaration Form

This form is to be completed by an MCS certified installer in the event that the MCS certified renewable product(s) of an RHI accredited heating system is/are replaced. Ofgem require this form to determine whether the participant is continuing to comply with their ongoing obligations.

To be completed by an MCS certified Installer	
RHI accreditation	
Application number (e.g. A123456):	
Scheme participant's full name:	
Property information	
Installation address:	
Installer information	
MCS Certificated Installation Company Name and Address:	
MCS Certificated Installation Company MCS number:	
Original Product information	
Original MCS Installation Certificate number:	
Original MCS Installation Certificate product name(s) and number(s):	
Please list the date when the original product ceased to provide heat to the property:	
Reason for decommissioning original product:	
Original product decommissioning date (if known):	
Replacement Product information	
MCS Certificated Product name(s) and number(s):	
MCS Certified Product Licence Holder:	
Technology type:	
Commissioning date of replacement product:	
Is the system meter ready ?	
Capacity:	

system product(s) which has been replaced:	
Estimated annual generation (solar thermal only):	
Please select the purpose of the plant: (Space heating/DHW/Space heating & DHW)	
Seasonal Coefficient of Performance (SCOP) (heat pump only):	
Flow temperature (heat pump only):	
Does the system contain more than one MCS certified product?	

Where the product was installed by the MCS certified installer completing this form:

I have given the participant a commissioning report: Yes No

I confirm that the participant holds heat loss calculations for the property: Yes No

I confirm the parts commissioned were all new and have attached evidence of this: Yes No

I have attached photos of the product's name plate and warranty information:

I declare that the information provided is correct to the best of my knowledge and belief

Installer signature

Signed _____

Date _____

To be completed by the participant	
Have you made any structural modifications to your property since your RHI accreditation date? (If yes, please describe these)	

I declare that the information provided is correct to the best of my knowledge and belief.

Participant Signature

Signed _____

Date _____