| **Template for response to “Administration of the Boiler Upgrade Scheme” consultation** |
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| 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. |
| Organisation Name:  | Association for Renewable Energy and Clean Technology (REA) |
| Organisational Type:  | Trade Association |
| Completed by: | Pablo John |
| Contact details: | pjohn@r-e-a.net |
| Confidential response: |  Yes  **No**  Partially Anonymous |
| **Questions on the proposed administration of the Boiler Upgrade Scheme** |
| 1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.
 |
| Yes, we agree with this proposed approach as it can easily be confirmed by installers and minimises inconvenience to the consumer, which could discourage consumers from signing up to the Boiler Upgrade Scheme. |
| 1. 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.
 |
| Yes, we agree installers should be the party to provide evidence to Ofgem. Installers possess the technical knowledge needed to successfully assess and report custom-built properties to Ofgem. |
| 1. Is there any other evidence we should request to prove that properties are custom-build?
 |
| No |
| 1. Do you agree or disagree with the proposed approach to evidencing that a property is not social housing? If you disagree, please say why.
 |
| Yes, the definition given under section 68 of the Housing and Regeneration Act 2008 gives clear precedence and legislative clarity for the definition of social housing. Using existing legislation will prevent confusion among local authorities. It will also prevent arbitrary or contested definitions of social housing. |
| 1. 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.
 |
| Yes, using an API and taking an EPC reference number from installers will create the most seamless way of gathering evidence, preventing the burden from falling on consumers or installers. |
| 1. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.
 |
| Yes, we agree with the approach to administering insulation exemptions. However, when a letter is required we would like to see further clarity on the contents of the letter, the information provided, and the source the letter would need to originate from to be considered acceptable.  |
| 1. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?
 |
| Further input needed |
| 1. 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.
 |
| Yes, requiring installers to declare whether a property is on the gas grid seems the most reasonable approach as it takes the need to understand grid connections away from the consumer and minimises the amount of paperwork on the consumer end. |
| 1. 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.
 |
| Yes, we agree with the use of the ONS tool as a appropriate for determining if a property can be considered rural. Further input needed |
| 1. 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.
 |
| Further input needed |
| 1. 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.
 |
| Yes, the use of an authorised signatory will simplify the process as it will give Ofgem a clear senior contact at each business to discuss Boiler Upgrade Scheme installations and any issues that might come up during the lifetime of the scheme. |
| 1. 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.
 |
| AgreeFurther input needed |
| 1. 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?
 |
| No, the information collection set out in this consultation seems enough. We also appreciate the proposed flexibility in information collection - allowing provisional quotes at the application stage. This will give renewable heating installers much needed flexibility in making applications and changes to any quotes made. |
| 1. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
 |
| Yes we would agree, we especially support the ability for property owners to confirm online. This gives flexibility to consumers allowing them to confirm their consent in a manner that works best for them. |
| 1. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
 |
| Yes, but we would support chasing phone calls and emails to ensure property owners are made aware of the need to directly grant consent. If consent if failed to be provided in seven days there should be a mechanism for late consent to be granted in exceptional circumstances. |
| 1. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
 |
| Further input needed |
| 1. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.
 |
| YesFurther input needed |
| 1. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
 |
| Yes, however there should be chaser mechanisms in place such as phone calls or emails to remind installers of their obligations and deadlines. |
| 1. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
 |
| AgreeFurther input needed |
| 1. 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.
 |
| Agree, installers must be required to inform property owners and confirm this to Ofgem. |
| 1. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
 |
| We would support giving further notice to installers by giving installers notice within 7days of an Ofgem decision. This will allow installers to fix whatever error has led to thewithholding of payments and account for a financial loss of payments.  |
| 1. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
 |
| Further input needed |
| 1. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
 |
| Further input needed |
|  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.  |
| We would like reports on vouchers and budget to be published monthly. This will bring the Boiler Upgrade Scheme in line with other schemes such as the RHI. |
| 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?  |
| Further input needed |