# **Proposed amendments to the Boiler Upgrade Scheme Regulations**

Response from: Salvador Acha and William Baker

1. **Do you agree with the proposal to allow for the potential differentiation of the grant levels for different types of property or property owner within the regulations? Please provide evidence to support your response.**

*Yes, we agree. Differentiation could be helpful to better target grants and subsidies towards accelerating the transition away from certain fossil fuel heating technologies.*

*Any differentiation based on property type, owner, fuel source etc must be implemented in the simplest manner possible such to not further complicate the processes by which one can claim the grants (perhaps with an easy-to-use calculator enabling applicants to quickly determine how much they can claim given their circumstances). It is also important that industry is made aware of the offered grant levels and eligible parties for each to ensure they are able to provide accurate quotes to consumers.*

*Overall, we believe the level of funding needs to increase but it also needs to be more targeted towards early adopters of low carbon heating systems to gain momentum in the market. The approach could aim at supporting two types of households. First, homes of a large size that irrespective of the economic wellbeing of the household need support to convert such dwellings. And secondly, aiming for older properties that urgently need renovation due to their poor thermal performance, regardless of household income.*

1. **Should we maintain the current requirement for a valid EPC with no outstanding recommendations for loft or cavity wall insulation? Yes/No. Please provide evidence to support your response.**

*We support the requirement for an EPC with the caveat that we also believe some reform to the EPC is necessary (see below).*  *Aside from reviewing the EPC scheme it is critical to reduce heating demand across the UK. Therefore, recommendations for loft or cavity wall insulation would support consumers making sound choices when retrofitting homes. It is important that heat pumps are only installed in suitable properties to ensure adequate levels of heating performance. This is essential to ensure customer satisfaction and to grow consumer confidence. If the insulation recommendations are removed, a boost in heat pump installations in the short term may occur, however uptake could be hindered in the long run due to low levels of satisfaction with the heating levels provided compared to existing fossil fuel systems.*

*To streamline the process, it would be preferred for consumers to install both a new low carbon heating system and do the insulation altogether (with grants for the heating system issued upon confirmation that the required levels of insulation has been installed)*

*We support the requirement of an EPC but recommendations on insulation is important for them to be included in such assessments. It is widely recognised that there are many flaws with the current EPC rating system and it needs to be urgently addressed. In this* [*report*](https://www.imperial.ac.uk/grantham/publications/energy-and-low-carbon-futures/decarbonising-buildings-insights-from-across-europe.php) *published by the Grantham Institute at Imperial College, we recommend that the EPC should be reworked to base energy efficiency on real-world insulating and operational performance of materials and the SAP should be made more comprehensive.*

 **3. If you consider the EPC requirements to be a barrier to uptake, what specifically do you consider to be the issue:**

-          **Requirement to have a valid EPC**

-          **Requirement to have a valid EPC with no outstanding recommendations relating to loft or cavity wall insulation**

-          **Other**

*The EPC requirement does not present a major barrier provided that acquiring a new EPC certificate can be achieved as part of the procedure to claim the grant rather than an entirely separate process the consumer has to go through (i.e. while attempting to claim the grant consumers are offered the opportunity to book an EPC assessment directly) .*

1. **If we retain the EPC requirements, are there any potential changes we could make to ease the consumer journey without risking heat pumps being installed in unsuitable properties? For example, allowing the submission of an expired EPC with no recommendations for loft or cavity wall insulation.**

*By merging the processes by which one can acquire a new EPC with the application for grants, this will take a lot of the pressure off the consumer and streamlines the process. The intention should be that through filling out a single application form the consumer can submit the required documents, if available (and therefore be able to claim the grant immediately), or alternatively book an EPC assessment as part of the grant application. Following the assessment, the new certificate should be submitted automatically by the assessor without consumer input to move the application to the next stage.*

*To ease the consumer journey, the addition of having to provide a valid EPC should NOT constitute an additional burden from an organisational standpoint. We advise it should be one process to apply for one grant for one heat pump installation.*

**5. Should we allow biomass boilers with a cooking function provided the cooking function is integrated and cannot be controlled separately to the heating function of the property? Please provide evidence to support your response.**

*If it’s only for large rural homes where the power grid is not robust, biomass for cooking is a sensible option to compliment biomass boiler. The caveat of this approach would require ensuring an affordable and ethically source biomass fuel can procured for this market segment.*

*Yes. It is important to subsidise the installation of low carbon heating systems which are suitable in instances where heat pumps are not. This will support the broader transition away from fossil fuel heating systems. Moving away from natural gas consumption should be a national priority.*