

Response ID ANON-XEER-8HCG-X

Submitted to Boiler Upgrade Scheme and Certification requirements for clean heat schemes consultation
Submitted on 2025-05-06 17:16:46

About you

What is your name?

Name:
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What is your email address?

Email:
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What is your organisation?

Organisation:

What type of organisation are you responding on behalf of?

Private Individual

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:

Other (please specify):

LinkedIn

Part 1: Boiler Upgrade Scheme Consultation

1 Do you agree with the proposal to amend scheme eligibility criteria to allow more installations of heat pumps in combination with other electric heating appliances?

Yes

Please provide evidence to support your response.:

While efficiency is good, getting to net zero overall is the goal, and in practice it may be best for some homes (eg low-demand flats) to allow (say) simple resistance heating with a heat battery for DHW along with an air-to-air heat pump for space heating.

2 Do you have any views on the proposed eligibility criteria that should apply to multi-technology systems?

Yes

Please provide evidence to support your response.:

Any reasonable all-electric (and therefore zero-carbon ~2030) solution should be allowed especially for smaller systems, eg as a combination of on-demand resistive DHW and electric shower units with in-duct resistive heating for Passive House or similar which has very low demand and for which the CAPEX and up-front (embedded) carbon may not ever be repaid.

BUS should possibly cover reasonable and grid-friendly (eg frequency-responsive or DR-responsive) solar diversion schemes - for my home my new heat pump will be idle >6M per year while diversion covers all DHW demand. I added frequency response in software.

Other supporting tech that may support grid-friendly (Demand Response, frequency response, etc) space and water heating such as electric heat batteries should be considered also.

Thus, an all electric but otherwise technology agnostic approach might be appropriate, though maybe with less grant for resistive (low CAPEX, CoP=1) equipment.

3 Should the BUS provide grants to support the installation of air-to-air heat pumps?

Yes

Please provide evidence to support your response.:

They may be the most practical LCH solution for small premises, can be cheap, have a higher CoP than ASHP or GSHP, and can also mitigate future overheating risk, eg in office-to-residential conversions.

4 Do you have any views on the eligibility criteria that should apply to air-to-air heat pumps if supported by the scheme?

Please provide evidence to support your response.:

Noise and efficiency minima should be set.

Encourage DIY-able (eg non-F-gas) devices.

5 Do you have any views on the advantages of certain types of air-to-air heat pumps that could be supported by the scheme, such as products that provide both space heat and hot water?

Please provide evidence to support your response.:

Support for devices that need no external units for small homes (terraces) and without ground-floor space (eg flats) may be useful.

6 Do you have views on the appropriate grant level to support the installation of air-to-air heat pumps?

Yes

Please provide evidence to support your response.:

If they can become free or nearly so it may remove significant barriers for some homes to move to LCH.

7 Should the cost of an integrated or separate electric hot water heating appliance be included in determining an appropriate grant level? .

Yes

Please provide evidence to support your response.:

8 Do you have views on a reasonable level of air-to-air heat pump deployment on the BUS if a £1,000 or £2,000 grant was offered?

Please provide evidence to support your response.:

9 Do you have views on other barriers (i.e. non-cost related) to installing air-to-air heat pumps?

Please provide evidence to support your response.:

Solutions that deal with the realities of available space inside and outside smaller UK homes, and homes not at ground level, and the ability to in some cases self-fit to avoid a real/perceived MCS premium, ie not just meeting the constraints of homes of wealthy owner-occupiers in spacious detached homes with large gardens, would help uptake of LCH.

10 Do you have any views on whether government should provide grants to support the installation of electric heating technologies that are not heat pumps (e.g. heat batteries)?

Yes

Please provide evidence to support your response.:

Eg for space-constrained low-demand flats, heat batteries can make LCH practical, and with a better CAPEX/OPEX balance and reduce overall carbon footprint including embedded/upfront carbon. Larger capacity low-loss devices potentially help ride through dull days or even dunkleflaute.

My heat battery plus PV diversion means no mains electricity demand at all for heat for most of the year, for example. The >2d heat storage helps present a much better load profile to the grid than might otherwise be the case: <https://www.earth.org.uk/statscast-202012.html#2024-12>

11 What eligibility criteria should apply to other electric heating technologies?

Please provide evidence to support your response.:

Lower CoP (Coefficient of Performance) heating such as resistive (CoP=1) should usually only be accepted for small systems (low annual demand) or when it can be shown that higher-CoP solutions are not reasonable/practical, or where they are making agile use of electricity 'exergy' such as PV diversion, or where multi-day storage and other grid services (frequency response, DR) will be provided.

12 Do you have views on the appropriate grant levels to support the installation of other electric heating technologies (e.g. heat batteries) if supported by the scheme?

Please provide evidence to support your response.:

Part 1: Boiler Upgrade Scheme Consultation

13 Do you agree that hire-purchase and conditional sale agreements should be permitted alongside the BUS?

Yes

Please provide evidence to support your response.:

Many homes that should be retrofitted with heat pumps will not have the cash to pay outright, so other models of payment/ownership should be allowed. I have been discussing today a possible community energy scheme which heat pumps (and other low-carbon tech) might be part of, and which probably a minority of the householders would have free cash for.

14 Do you agree that hire-purchase / conditional sale 'plus' agreements combined with an energy tariff billed in kWh should be permitted alongside the BUS?

Yes

Please provide evidence to support your response.:

kWh electricity *in* in preference to or alongside kWh heat *out*

15 Should consumer hire agreements be permitted alongside the BUS?

Yes

Please provide evidence to support your response.:

16 Do you have any views on the level of demand for i) hire-purchase and conditional sale agreements and ii) consumer hire agreements alongside the BUS among different consumer groups?

i) hire-purchase and conditional sale agreements alongside the BUS among different consumer groups? Please provide evidence to support your response.:

Many homes that should be retrofitted with heat pumps will not have the cash to pay outright, so other models of payment/ownership should be allowed.

ii) consumer hire agreements alongside the BUS among different consumer groups? Please provide evidence to support your response.:

Many homes that should be retrofitted with heat pumps will not have the cash to pay outright, so other models of payment/ownership should be allowed.

17 Do you have any views on what industry and government would need to do to enable 'heat as a service' models to be offered alongside the BUS in the future?

Please provide evidence to support your response.:

I believe that HaaS models should be available and would be useful to a slice of the population, but much more R&D and installer and user education is needed to get there. Innovate UK and similar should keep priming the sector. Also looking to the Continent and to network heat schemes where heat kWh is sold to the end user, and it is not visible to the user how that is generated, may be useful, ie the heat pump could be treated as an opaque box and the generated heat is the Ofgem-regulated sale. Because of CoP issues the sale of DHW and space kWh might need to be separated, or the effect of CoP made visible.

18 Do you agree that third-party ownership providers wishing to access the BUS should be restricted to MCS certified companies?

No

Please provide evidence to support your response.:

There is already a lot of suspicion of MCS, and of MCS 'premium' on system costs, and entrenching a monopoly will neither enhance trust nor keep MCS on its toes. Equivalence of performance should be allowed.

19 Do you agree that third-party ownership providers wishing to access the BUS must be carrying out an activity regulated by the FCA and therefore be FCA authorised?

Yes

Please provide evidence to support your response.:

20 Do you agree that third-party ownership providers wishing to access the BUS must register with Ofgem and provide proof of FCA authorisation?

No

Please provide evidence to support your response.:

Probably yes overall, but possibly with exceptions or reduced overheads for small providers (limited by £ lent and/or number of sites) and small community schemes owned and/or controlled by those buying the equipment.

21 Are third-party providers wishing to access the BUS likely to operate as FCA authorised brokers or lenders, or both?

Authorised brokers

Please provide evidence to support your response.:

22 Are there any additional conditions beyond FCA authorisation and MCS certification that should be required for a third-party ownership provider wishing to access the BUS?

Not Answered

Please provide evidence to support your response.:

Fit and proper persons in controlling/senior roles, at least for larger or non-community owned providers.

23 Do you agree that the minimum requirements outlined above should apply where a third-party ownership agreement is delivered alongside the BUS?

Yes

Please provide evidence to support your response including whether there are any additional requirements that should apply, or any proposed requirements that are not appropriate.:

24 Do you agree that third-party ownership providers operating under the BUS should not be able to repossess or remotely decommission a heating system?

Yes

Please provide evidence to support your response including any potential unintended consequences for the provider and consumer.:

There are horror stories of residents ripping out and selling working heating systems for scrap, and delinquent but able bill payers, so maybe a 'limp-home' mode should be allowed (DHW and heating limited to non-luxurious temperatures) to encourage payment but not endanger health. Clearly a very sensitive topic.

25 Should there be a maximum term for eligible third-party ownership agreements delivered alongside the BUS? For example, restricting contract length to the average life span of a heat pump.

Yes

Please provide evidence to support your response.:

Loan term no longer than typical equipment life seems like a basic alignment of interests.

26 Should third-party ownership agreements delivered alongside the BUS adhere to standard clauses or a model contract setting out the minimum requirements to ensure that consumers are not subject to unfair clauses?

Yes

Please provide evidence to support your response.:

In general people are already failing to understand their systems and are (partly through FUD spread by incumbents) worried about transition to LCH, and such restriction of unfair clauses may help build trust.

However, if these go too far the other way, the risk premiums to cover the risks of malicious defaults etc may make the financing costs too high, and become a barrier to LCH happening at all, as arguably happened with the Green Deal.

27 Would the utilisation of standard clauses or a model contract delivered alongside the BUS cause any difficulties for integrated contracts that include packages of technologies e.g. heat pump and solar panels.

Not Answered

Please provide evidence to support your response.:

Part 1: Boiler Upgrade Scheme Consultation

28 Are there additional ways in which we can simplify the heat pump installation process to further improve access to the scheme?

Please provide evidence to support your response.:

Yes.

If DNO permissions and BUS grants could be approved same-day (and with some conditionality, eg covering a window of pump sizes) and heat-pump installers could do heat loss calcs on arrival, plus some other operational efficiencies that I intend to outline in an open letter to the SoS, most installations, including distress replacement of gas systems in winter, should be possible in two days. This also makes a heat pump installation possible for people who cannot take lots of time off work for example. And there are various companies bringing solutions to market to that end.

My attempt to get a heat pump took ~12 years, or about a year, or a full week, or a couple of months for the last serious fault to be rectified, depending on how you want to measure it. That lack of efficiency will not get heat pumps into the 15M to 20M UK homes currently with gas boilers still standing in 2050!

<https://www.earth.org.uk/Octopus-heat-pump-journey.html>

Part 1: Boiler Upgrade Scheme Consultation

29 Do you agree with the approval of the MCS Customer Commitment as a code of practice for the purpose of consumer protection on the BUS?

Not Answered

Please provide evidence to support your response.:

30 Are there additional measures the Department and Ofgem could implement to enhance consumer protection under the BUS?

Not Answered

Please provide evidence to support your response.:

Part 1: Boiler Upgrade Scheme Consultation

31 Do you agree with the proposal to require installers to deduct the grant amount from the upfront costs of the eligible plant?

Not Answered

Please provide evidence to support your response.:

Part 2: Certification requirements for clean heat schemes Consultation

1 What are your views on the current position in relation to the Boiler Upgrade Scheme, the Warm Homes: Social Housing Fund and the Warm Homes: Local Grant i.e., allowing for MCS or equivalent in relation to certification of clean heat products, installers and installations?

Please make clear in your response if your views apply across all schemes, or refer to a specific scheme/schemes.:

2 What are your views on the current position in relation to the Energy Company Obligation which allows for MCS or equivalent in relation to certification of clean heat products for innovation measures, data light measures and standard alternative methodology measures?

Please provide evidence to support your response.:

3 What are your views on the advantages that would stem from a sole certification scheme for clean heat measures?

Please provide evidence to support your response.:

4 What are your views on the advantages that would stem from a certification system which may include multiple certification schemes for clean heat measures?

Please provide evidence to support your response.:

5 Do you agree with the proposal to mandate MCS as the sole certification scheme for clean heat installations under government clean heat schemes and remove the option for equivalence?

Not Answered

Please provide evidence to support your response.: