



Date: 18/11/2012

Open Letter

Consultation reference: URN 12D/330 – Renewable Heat Incentive - Consultation on proposals for a domestic scheme

Dear Sir/Madam

The DECC consultation for extending the RHI scheme to domestic consumers is currently available for review and comment. The consultation will close on 7th December and we would encourage our existing customers and other interested parties to review the document and respond to the consultation. Below are a few points which we at AD Heating feel are of particular importance – we have responded via the online survey on the DECC website with this information, but feel that it may also be helpful for others to help form their responses. If you would like a full copy of the responses that we have made, then we would be happy to provide these.

Link to Domestic RHI Consultation document:

http://www.decc.gov.uk/en/content/cms/consultations/rhi_domestic/rhi_domestic.aspx

Link to online survey response:

https://econsultation.decc.gov.uk/decc-policy/rhi_domestic

Main points for comment:

- It is expected that those consumers that have received the RHPP and/or a Home Renewables Loans via the Energy Savings Trust will have this amount deducted from their potential RHI payments. For the RHPP this is understandable as a payment has been received from the Government, however we feel that it is unfair to those who have taken out the loan, as they will have to re-pay that loan – they will not be 'keeping' the money. (*Consultation question #6*)
- The consultation currently limits applications to 45kW or below. We have many domestic installations that require a greater heat load than 45kW for larger granite built Aberdeenshire properties; in addition to which log-boiler sizing requires an installation to be double that of a pellet boiler – so a 30kW installation becomes a 60kW installation to meet the design point of only filling the boiler once per day. Customers with these larger boilers will be penalised by not being able to apply for the non-domestic or domestic RHI schemes. We recommend that the MCS scheme which accredits boilers is extended to greater than



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45KW, or some other method is provided for domestic properties with larger boilers to still access the scheme. (*Consultation question #9 + #15*)

- All applicants will require to have implemented 'green tick' measures to ensure that their property is as efficient as possible prior to applying. There are some properties that will not be able to meet all of these measures without significant upheaval and investment. We believe that there needs to be clarification of how to manage these 'exceptional circumstances' to ensure that older properties which are more difficult to treat for efficiency measures do not suffer as a result of not being able to meet all of the 'green ticks' identified through the Green Deal assessment process. (*Consultation question #18 + #19*)
- Current proposals only cover retrofit heating solutions, so customers building a new house and installing renewable heating would not be able to apply for the RHI. We believe that there needs some method to include new build properties within the scheme. (*Consultation question #32*)
- We do not understand the logic for consumers not being allowed a back-up fossil fuel system when they are installing a biomass boiler. For many of our customers their oil boiler has not yet reached the end of its life, so it is cost effective to leave it in-situ and link it into the thermal store to provide back-up if necessary. We believe that there is no reason that this cannot be metered out for RHI payments, as with other technologies. (*Consultation question #42*)

There are a total of 75 questions in the consultation, to which AD Heating have provided a response to most (with a 'no comment' response where the question is asking for information outside of our area of expertise) – these five responses highlighted are the ones which we feel will most affect our existing customer base.

We hope that this information is useful and would be happy to answer any questions that you may have where possible.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Timperley', written over a faint, circular watermark logo.

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