

# Microgeneration Strategy

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DECC Consultation Response 2011



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# Who we are

Ascertiva Group is one of the world's leading third party certification companies with brands servicing business, industry and government. We have been in operation for over 50 years.

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## NICEIC

Originally formed in 1956 in response to electrical industry concerns on safety in the home, NICEIC operates under license competent person's schemes and the Microgeneration Certification Scheme (MCS).



## NQA

Our NQA brand offers the certification of management systems over a range of products and across a wide breadth of industry sectors, including MCS.

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# Executive Summary

- Consumer safety should be a paramount consideration when microgeneration technologies are installed in the home. Consumer reassurance should be provided by the relevant certification, issued by competent persons.
- DECC has stipulated that the Microgeneration Certification Scheme (MCS) is part of the qualification criteria to install the technologies safely. This is a sound policy.
- MCS should continue to be responsible for certification and cover all sizes and scales of microgeneration technologies, preferably across the whole of the UK. One registration scheme is easier to manage with cost efficiencies to installers and simpler compliance checking.
- MCS should be operated under licence from DECC with defined rules and it should be assessed independently by UKAS. The operating costs should be transferred to trade associations or registration bodies that DECC approve to run the scheme. MCS would impose little cost to the taxpayer, other than for basic administration of the licence.
- The existing electrical, heating and plumbing and building trades must play a key part in delivering the government's microgeneration strategy. These trades can be mobilised (by the business opportunity afforded by the Feed in Tariffs and the Renewable Heat Incentive) to provide the army of installers which are needed to deliver a critical mass of microgeneration installations and, therefore, help to achieve the government's carbon budgets and renewable energy targets.
- Training and competence is the key to large scale deployment for all microgeneration technology. The current training provision infrastructure, including private enterprise and the registration of installers in competent person's schemes, could be adapted to ensure competence and the development of skills in the workforce.
- DECC could license a register of accredited designers on a national database, in order to ensure the technologies were designed competently and to maximise the potential of the technology. Design information and advice for consumers should be held in a central hub, such as a website.
- The performance of Gemserv and REAL must be regularly monitored and reviewed by an independent body such as the United Kingdom Accreditation Service (UKAS) to ensure their suitability for the market.
- The Building Regulations and the microgeneration strategy need to be aligned to ensure delivery at a practical level for installers. Close collaboration between DECC and CLG is important.
- The Green Deal should embrace all viable renewable technologies, to ensure that consumers are provided with the best possible advice and, ultimately, the most appropriate technology.
- The microgeneration strategy needs to include consistent communication between consumers, installers, product manufacturers and energy providers, in order to ensure joined up delivery to the market.

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# Chapter 1 - Quality

## Protecting consumers and large scale installations, maintenance requirements and the Standard Assessment Procedure.

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### Question

**1. The Working Groups made clear MCS should continue to be responsible for certification in the microgeneration sector. Do you agree?**

### Answer

We agree. MCS has established a number of governance documents and a suitable framework to deliver responsible certification activities. Any change now would create more confusion in the industry and further

delays in large scale deployment of microgeneration technologies.

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**2. Do you agree that MCS governance should be improved and that it should move towards becoming a free-standing company? Please provide evidence to support your views.**

MCS should be operated under license from DECC, in order to provide independence without the liabilities of a free standing company and the potential conflict of interests which may arise. This is based on our experience with the Competent Persons Forum (CPF), which reports into CLG. It has been suggested that the CPF should be constituted as a free standing company. However, conflicting interests between members of the CPF would prohibit the running of a successful company. Similarly, the majority of the members of the CPF

are commercial companies in their own right or trade associations. As a result, many are reluctant to come under the direction of another commercial body. We believe MCS governance should not be compromised by the liabilities of becoming a free standing company and in fact should be operated in exactly the same way as Competent Persons Schemes through CLG. [See Question 3]. We would also be concerned that a free standing company would essentially be operating a monopoly, able to increase fees at will.

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**3. How can MCS be put on a more sustainable financial footing without compromising its independence and without the use of public funds?**

MCS should be operated under licence from DECC with defined rules, independently assessed by the United Kingdom Accreditation Service (UKAS). The operating costs would be transferred to the trade associations or registration bodies

which DECC would approve to run the scheme. MCS should then have no cost to the taxpayer other than basic administration of the licence.

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## Question

4. Do you agree that MCS should be extended to support technology limits over the strict microgeneration limit (<50kWe for electricity and <45kWth for heat)?

## Answer

MCS should cover all microgeneration technologies. Additional schemes for these larger technologies will lead to confusion in the industry. One registration scheme is easier to manage and

delivers cost efficiencies to installers with simpler compliance checking.

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5. What size, in terms of the upper limit for each technology, should MCS cover? Please provide evidence to support your views.

A size limit would not provide installers or consumers with useful information. An average consumer would not understand what size of microgeneration technology they may need. MCS

should be a universal qualification for installation and product.

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6. What type of insurance schemes should the industry consider?

A number of insurance activities should be a mandatory requirement for all registration bodies within the schemes. These should include: public liability; professional indemnity; and insurance backed warranty. Professional indemnity would cover the consultation/ design activities at the time and

for the life of the installation thereby protecting the customer. The insurance backed warranty on the installation would provide suitable protection for all against unforeseen problems and help to enhance consumer confidence in the installers and product.

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7. What are the specific concerns about the governance, transparency and flexibility of SAP?

The complexity of SAP can make it difficult for the untrained installer to achieve an understanding of its calculations and operating principles.

However, SAP is a useful tool for calculating the performance and energy requirements of a property.

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8. Do you agree that once RDSAP is aligned with SAP 2009 in 2011 it will be effective in assessing microgeneration technologies? If not, please identify other areas of concern that should be considered as part of future reviews.

We agree that once RDSAP is aligned with SAP it will be an effective tool in the majority of single installation cases and could assist with deployment.

However, our understanding is that even the proposed aligned version will not provide suitable calculations for multiple technology installations.

Market conditions and current trends suggest that some consumers may opt for more than one technology and would therefore require a full SAP calculation to be performed.

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# Chapter 2 - Skills

Installation, maintenance skills and capacity, ensuring good design and the supply chain.

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## Question

**9. How do we ensure that sector skills are in-step with sector growth? This will be about improving skills of the existing workforce as well as modified apprentice training - how will this be cascaded to companies and individuals most effectively?**

## Answer

Sector growth is currently difficult to predict. DECC figures suggest that Solar PV installation will continue at approx 150,000 per annum through to 2020 – resulting in approximately 1.2 million installations. There are estimates that the number of new solar thermal installations will be at around 85,000 per annum after the RHI comes into effect. For heat pumps, estimates post-RHI range from 25,000 per annum to 150,000 per annum. DECC projects 450,000 biomass installations by 2020.

On the basis of the available estimates, we believe that training and proof of competence is the key to large scale deployment for all environmental technologies. The infrastructure to provide the necessary training is already in place and has the potential to work well within the private sector.

Existing training providers already offer specific training to Competent Persons Scheme registrants. For instance, NICEIC offers electrical, oil and gas training for registered installers. The same model is capable of providing adequate coverage for MCS registered installers if MCS governance followed the structure of competent person's schemes.

As demand for the technologies grows, apprenticeships will need to evolve, in order to reflect the changing nature of installers' work. The National Skills Academy should set a National Occupational Standard and will have a key role in setting criteria for apprenticeships that are consistent.

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**10. What role could manufacturers play in training provision?**

Manufacturers play an important role in providing excellent product specific skills training, just as they currently do in the construction

industry. However, registration for competency lies with registration bodies such as NICEIC.

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## Question

**11. How can the marketing of, and accessibility to, training reach smaller companies and individuals?**

## Answer

Competent Person's Scheme operators, such as NICEIC, have a successful history of training SME's to a level compatible with the schemes they operate. For current small to medium sized businesses already operating in the construction industry, trade associations and registration bodies would therefore be the first port of call in terms of training.

Our brand name is associated with assessment, certification and verification and we have expertise in marketing and providing UK wide access to the training needed to achieve excellence for electrical, oil and gas installers. NICEIC also has a suite of training for microgeneration technologies. Therefore the route to market for and accessibility to, training is already established and the path for marketing the courses exists.

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**12. Are there enough people who can be trained – given the increasingly high uptake of solar PV, for example? How can we ensure that training gives sufficient weight to repair and maintenance?**

We believe there are sufficient existing numbers of skilled operatives within the existing trade sectors who can be "upskilled" to cope with the existing demands. This is subject to two conditions. Firstly, the business opportunity must be communicated to businesses which we have already begun. Secondly, homeowners should begin to see microgeneration installation as worthwhile and "normal".

With recognised and agreed national criteria, apprentice programs starting right now could deliver more skilled operatives within three years as demand grows. Existing apprentice training programs could supply additional semi skilled workers in phased batches to the industry in a regulated and formal structure.

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**13. How can we ensure that we capture the training needs of those installing these technologies in the commercial sector?**

Our views expressed in reply to questions 10, 11 and 12 apply to all sectors.

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**14. How can we ensure that design advice capacity is in place to meet demand projections?**

We propose that DECC could licence a register of accredited designers on a national database. Such a licence would enable the scheme operator to promote the register, build critical mass and ensure that installers are able to find designers quickly and efficiently. To provide the level of reassurance that is required, it is essential that

designs are fit for purpose. The competence of individual designers could be measured by individual certificates of competence under ISO/IEC 17024:2003. They would need to renew their certification on defined timetables, in order to provide assurance that an operator's competence had kept up with changes to technology.

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## Question

**15. What are the interim solutions to ensure householders are given the right advice now?**

## Answer

An interim solution would be to provide information on DECC's website or Consumer Direct's website, which could be referenced by householders and included in MCS literature. Manufacturers

could have an important part to play in giving the right advice to householders. They have a financial incentive, and often the marketing resources, to do so.

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**16. How should this approach be modified for the commercial sector?**

Manufacturers already have the experience and in many cases the resource to manage this on behalf of the installers.

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**17. What further steps should be taken to ensure that appropriate training and knowledge-sharing reaches all those working on wider energy, construction and environmental issues?**

Joined up thinking across government, regarding consumer safety, the building regulations and microgeneration policy issues is key to a successful delivery of any strategy. Close collaboration between DECC, CLG and BIS is needed.

Similarly, product manufacturers, builders' merchants, electrical

wholesalers and the construction supply chain need to be primed to look past competitive issues and take a more strategic role in enabling the strategy and knowledge sharing to be successful. This could be through a forum hosted by DECC and also facilitate the gathering of information – see Question 19.

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# Chapter 3 – Technology

Market development, technology specific issues, integration with the broader electricity system, storage and efficiency of non-renewable technology.

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18. What sort of market intelligence should industry and Government be collecting?

Market intelligence that should be collected include:

- Number of microgeneration product units sold
- Number of smart meter connections
- Number of Gemserv certificates issued
- Number of MCS registered installers
- Number of MCS product registrations
- Number of microgeneration-specific training courses undertaken

By comparing the amount of product sold in wholesalers versus the number of certificates issued, some idea of compliance may emerge;

for instance if more product is sold than certificates issued then one can assume that installers are not complying with MCS.

The levels of knowledge and awareness of the technologies and their impact need to be measured and regularly monitored. This needs to be gathered from the trade, consumers and commercial sectors. Without this, the progression and take up of the microgeneration strategy will effectively be immeasurable. Take up of training courses is therefore an important measure of the progress in upskilling installers.

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19. How should this market intelligence be collected using existing networks and relationships such as trade bodies, MCS and Certification Bodies?

The data could be collected by the existing networks through an established electronic notifications system. Most existing work types and installations require notifications under the building regulations. Rather than investing in new IT infrastructure, an overhaul of these existing systems and multiple databases could produce a faster and more efficient notifications process.

Levels of knowledge could be identified by traditional market survey analysis. Degradation measurement could be captured by installers on return visits to their customers if repair, maintenance and improvement (RMI) is built into not only their training, but also the installation practice.

We also recommend a supply chain forum hosted by DECC which could collect information, such as market intelligence.

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## Question

**20. Do you agree that industry working with Government should update route maps and use them as a tool to support technology development?**

## Answer

Yes. Route maps should be revisited to identify their purpose and ensure they are correct and accurate in terms of current and future deployments. At such a pivotal time for the industry any discussion of

reviewing the existing incentives will create uncertainty and may hinder deployment. The exercise should, therefore, be approached with care.

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**21. What could Government and other parties do to ensure that the grid is ready to cope with impacts of an increase in microgeneration technologies, in particular heat pumps?**

This is not an area within Ascertiva's expertise.

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**22. How can DNOs and the microgeneration industry work better together so that both sectors understand the relevant technologies, their impacts, and how to manage these impacts in a cost-effective manner?**

We believe DNOs have a significant role to play in the microgeneration industry. Many DNOs refuse to accept many training/competences that could be universally accepted. This needs to be addressed by

the DNOs so that the need for training, bureaucracy and barriers to future installations especially with smart meters and energy monitoring devices can be reduced.

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**23. How can heat pumps be rolled out at scale and integrated into a low carbon electricity system – what are the best ways of achieving this?**

All technologies can be deployed relatively easily and none should necessarily be singled out. Heat pumps can be deployed because of their on/off grid potential and community heating systems should

also be considered as we move forward with building design and planning. Retro fitting of heat pumps is an option for terraced, semi and detached properties.

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**24. How can the controls and microgeneration industries work closer together to ensure that a systems approach becomes a reality?**

Government could set up and endorse a technology steering committee, made up of interested manufacturers and developers of

control systems and microgeneration products. This could be run under the chairmanship of DECC.

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Question

25. How should the industry, other stakeholders and Government tackle the need to raise consumer awareness of how heating systems can work more effectively?

Answer

The key to success lies in reassuring consumers that their decision to use the technology is as normal as having, for instance, central heating installed. The technology must come to be seen as a "need-to" rather than a "like to have" installation.

Although the business opportunities may provide manufacturers and installers with incentives to enhance consumer awareness, the mainstream media will have a role to play in promoting the technology.

Consumer awareness would be raised if leading members

of government promoted microgeneration technology personally and by installing it onto government buildings.

A marketing and public relations strategy should be put into place if consumer awareness is to be raised.

Government could set up a website on which consumers could obtain information on technologies and typical costs see Questions 15 and 32. Ascertiva Group would be ready to help DECC with any such project.

26. As a means of future proofing buildings for microgeneration technologies, how can heating solutions that provide for hot water storage be encouraged?

The Building Regulations can be used to future proofing buildings by, for example, requiring the provision of twin coil cylinders/ thermal stores when installing or replacing existing equipment. This must mean significant engagement across DECC,

CLG and the construction industry, to ensure that the microgeneration strategy informs the current proposed changes to the Building Regulations and those who are installing the technologies understand under which regulations they fall.

27. What should the microgeneration industry do to take forward the development of storage technologies?

The microgeneration industry should consult with planners and architects to identify future design types, where and how the equipment can be installed in buildings of the future. Government can

play a significant role here, by facilitating a consistent approach to future buildings through the building regulations and the planning process.

28. What more should the industry be doing to promote Flue Gas Recovery Systems to increase take up?

Industry should have an independent authority established to check and accredit product performance. MCS has a requirement for product testing and the MCS installer scheme also goes so far as to provide an estimated saving to the end user after the installation of a

microgeneration technology. The scope of MCS could, therefore, be expanded to include all heat recovery systems. Consumers would have a better understanding of the capital outlay costs and indeed the potential savings with these measures.

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# Chapter 4 – Advice and information

Overall awareness, knowledge and confidence, availability of advice and information, links to the Green Deal, property specific advice and consumer knowledge.

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## Question

**29. How can you help Government disseminate the results from best practice and exemplar projects?**

## Answer

NICEIC would be able to communicate quickly and effectively with its network of approved assessment centres, its installer

network and trade media any best practice or case studies.

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**30. Do you agree that MCS is the best route for providing a directory of installation companies? If not what alternative do you suggest?**

MCS should be the industry recognised standard for installing microgeneration technologies and any central directory needs to be operated by an impartial third party. However, as MCS providers grow in size it is only natural that

they will promote their installers above any competitors. Market forces must be allowed to work and as such directories become well known to consumers and commercial specifiers in this way too.

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**31. Do you agree that installation companies removed from the MCS scheme for malpractice should be clearly reflected in the directory of installation companies? Please provide evidence to support your answer.**

We agree. Removal from any MCS register must be an option if the scheme is to provide peace of mind for consumers and for the trade. NICEIC removes contractors from its register of Approved Contractors and Domestic Installers when necessary as part of an UKAS accredited complaints procedure. NICEIC also has a “wall of shame” on its website where consumers can see those rogue companies misusing the NICEIC logo.

Current MCS complaints and appeals are adequate but they could be simplified with the responsibility placed firmly in the hands of the certification body. The requirement to join a consumer code, which has neither a power of redress nor a complaints process of its own, is meaningless. This is an example of red tape which could be removed.

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**32. What is the best way of making sure that microgeneration and Green Deal advice provision work together?**

The best way to achieve effective collaboration between MCS and the Green Deal is to make sure that DECC is responsible for both. There should be a central online information

hub which is government owned and could also serve as a database of installers, those removed from the register and technical information and guidance.

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Question

33. What role should MCS installation companies play in providing objective advice on which technology to install?

Answer

MCS companies can play a significant role in providing objective advice. MCS should be separated from the installation activities so that independent and clear impartial advice is given. The insurance

industry has very good systems in place here and advice should be sought from that sector to see how they maintain impartiality whilst offering solutions to consumers.

34. Do you agree trade bodies should collate information on the advice their respective members are providing? If not, what alternative do you suggest?

The **certification** bodies should retain the information on the advice their respective members are providing. Notifications are perhaps the only practical way of monitoring the installations and therefore advice on technology. We believe that

trade bodies should concentrate on providing best practice guidance and installation techniques and of, course, representing their members to government, the industry and consumer organisations.

35. Do you agree that such information sheets would be valuable? Please provide evidence to support your view.

Information sheets are a valuable tool and we produce many of these information sheets for trade

and consumers. A central online hub would be the best place for these to be downloaded.

36. Who do you think is best placed to write and disseminate them? Please provide evidence to support your view.

Ascertiva Group already offers a range of pocket guides across a number of technologies and would be well placed to produce

such information sheets for a fee or licence these to other certification bodies, trade and consumer outlets.

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# Chapter 5 – Decentralisation and cross-cutting issues

Community energy, Local Authority and private sector opportunity, cross-cutting, future energy networks and smart grids.

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## Question

**37. What aspects of the Green Deal Framework will need to closely align with the microgeneration consultation as set out in this document?**

## Answer

The Green Deal framework should align with the microgeneration framework, the most obvious link being that all installations are conducted by MCS registered companies using MCS product. The Green Deal should include all

viable renewable technologies, in order to provide consumers with choice and significant protection against mis-selling of inappropriate technologies. This would also protect the Green Deal brand.

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**38. Can you illustrate with examples the potential opportunity that the 'community energy' sector presents?**

A community project is being planned on the River Kennet in the North Wessex Downs. The proposed project will involve a number of stakeholders working in partnership to reduce the overall cost of individually installed water turbines that will service a number of properties and local projects along the entire length of the river.

Work has begun to engage with all parties in understanding all views and positions supporting and opposing the project. If the project is successful in its application a number of opportunities exist including looking at an "MOT" of existing installations and current electrical systems before any new alterations are added.

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**39. What do you feel are the non-financial barriers to developing community energy?**

The non financial barriers include perceptions and attitudes of property owners to community energy, the legal barriers and complexity of such arrangements prevent communities moving forward. Local council or

community liaison is essential in this regard and small operatives and small wholesale suppliers are the key to future successful projects, managed locally at a town level.

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# Contractor Case Study

## True Power Electrics

True Power Electrics was set up seven years ago by female contractor Kellie Dillon-Welch. As someone who always took an interest in the environment, it was a natural progression for her to get involved in the microgeneration industry. She has now built up a wealth of experience working on solar PV installations across the South East.

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Kellie initially enrolled on the NICEIC's MCS accreditation scheme which gave her the expertise and certification to carry out renewables work. She also opted for an additional course on testing and commissioning which helped when it came to the complexities of testing the systems from the inverters to the PV Arrays.

"It was tough at first as it involved a whole new set of skills, but I have continued to update my training whenever I can," she added. I like to have all the knowledge possible as the industry is constantly evolving; it also gives the client greater assurance."

Since gaining the appropriate qualifications in April 2010, Kellie has worked on more than a dozen jobs with, Eternal Energy. They carry out all the consultation, survey and installation work with Kellie connecting the system up to the domestic supply. Explaining the skills required, Kellie said: "The solar PVs are connected to DC cables which then connect to a stop switch. An inverter then converts the power into AC which is linked to the export meter via more safety stop switches.

"It is preferential to keep the DC cable as short as possible so we install the inverters in the loft where possible. The electrical side of the job usually takes between 2-5 hours, with a complete installation taking between two and three days. With the Government's recent decision to retain the feed-in-tariff scheme and progress with a renewable heat incentive, those connected to the renewable industry are expecting to



see a rise in demand for their services over the next few years. Microgeneration is set to play a prominent role in the future of housebuilding so it should be a great opportunity for those with the skills and knowledge to supply and install renewable products," added Kellie

"We have definitely seen the market pick up in the last few months and I think as the summer comes round more and more people will look into the possibility of generating their own electricity. Clients I speak to are generally more interested in the eco benefits rather than the financial gain, but the payback from these systems can mean people save hundreds off their fuel bills."

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# Contractor Case Study

## A.P. Chant

A.P. Chant began life as a small plumbing outfit in 1993. Just seven years later its founder, Ashley Chant, employed 50 staff, and in 2006 he bought an electrical company to complement the growing business. He now employs just under 100 staff and has seen the move into renewable energy a natural progression for the firm.

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Ashley believes the microgeneration industry is a huge opportunity for plumbers and electricians and has dedicated a section of his workforce to develop that side of the business.

“The renewable side of the business has been a natural progression. We have had to change with the times as old forms of heating and energy use are becoming redundant,” comments Ashley. Rather than see this as a challenge, we have seen it as an opportunity and are investing vast sums into it to ensure we are at the forefront of this renewable revolution. We pride ourselves on our superior customer service and the use of high quality materials by highly trained professionals and competent staff.

“As we were already a member of NICEIC with our electrical division we only considered NICEIC for MCS accreditation. In order to achieve compliance we had to ensure that we implemented the correct standards and procedures throughout our company. Although the inspection was thorough we passed with no non-conformances which we were really pleased with. We put a number of electricians and plumbers on microgeneration courses specific to their area of expertise alongside members of the management team to widen their knowledge. Our specialist team complete the installation we do not subcontract any of the work.”

As an MCS approved installer A.P. Chant customers are eligible for clean energy cash back incentives via the Feed-in tariff, which provides guaranteed payments to businesses and householders

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for small scale electricity generation. Similarly, solar thermal and heat pumps customers will be eligible for the Renewable Heat Incentives (RHI's), due out in June, which offers a similar cash back scheme to the consumer.

A.P. Chant provides the entire micro-generation service from initial consultation through to survey, quote and final installation.

“The public is becoming more and more aware of the impact of the energy that they use, driving the demand for renewable technology,” says Ashley. “In terms of growth, the microgeneration business has some real potential, more so than any other industry in the UK.”

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# Consumer Case Study

## Andy Wooton

Andy Wooton had been considering renewable energy for quite some time but felt held back because there appeared to be little or no expertise in the field until recently.

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“The eco side of things had always interested me and it was something I had considered, but I didn’t know where to start, nor indeed was I sure about what questions I should ask.” said Andy.

“However, after a chance meeting with a reputable supplier I discovered the process was fairly simple. The company sat me down and explained everything. There were no extra hidden costs and with the FIT (Feed In Tariff) rate guaranteed for the next ten years it seemed a sensible investment.”

In October 2010 Andy had 15 solar PV panels and a solar thermal system attached to the roof of his home in South London.

The installation took place over four days, and after recently receiving his first FIT payment, Andy admits he couldn’t be happier with the decision.

“I was asked to show my current energy provider the MCS certificate as proof of the products used and was sent an application form,” he added.

“I now have an arrangement with my supplier whereby I note down and supply the meter readings each month, so that they can monitor PV performance across a range of different properties. This is building up a valuable source of data on a relatively new energy source.”

With an inverter fitted next to his traditional metering system Andy is able to keep a close eye on the output levels of the PV system.

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“After just few days the inverter display started showing how much energy was being produced. Since then, the output levels have increased on a daily basis and I check it almost every day. It has become a bit hypnotic, but rather fun!

“The solar PV panels have produced more than 100 KW hours which is quite good considering the time of year (October-January).

“My expectation is that, as the days get longer, they will cover all my electricity consumption during the Spring/Summer months and the solar thermal system will provide all our hot water needs throughout the same period.

“We have so much spare capacity on our roofs in this country that I think Solar Power is a great idea.

“My advice is to take your time to seek estimates from professional, good quality installers. It’s what I did and I have no regrets about that decision whatsoever.”

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