



The Certification Mark for Onsite
Sustainable Energy Technologies

GSHPA Members' Day & AGM

Chris Roberts, Director, MCSSCo

20th September 2018, NCC

Novation & Beyond

- Novation complete April 2018; new Board in control
- Board Focus: making MCS the best it can be and viable for the future
- Achievements to date:
 - C&E Manager (Ben Howe) appointed
 - Fee increase process completed and launched
 - System for charging for duplicate/amended certificates introduced
 - Licence documents updated
 - New MID under construction following detailed tender process
 - New MCSSCO CEO (Ian Rippin) appointed
 - C & E work ongoing, focussing on cases unresolvable by CBs
 - First Stakeholder Advisory Group meeting in July
 - Communications consultant audit of MCS external comms, and is starting to progress recommendations – new format Newsletter out later this month.
 - Review and refresh of scheme documents – to be commissioned by CF
 - Consumer research project on brand recognition
 - CF funding for legacy projects underway: heat pump guidance, biomass, 2 PV projects
 - Joint MCSSCo & MCS CF FiT response submitted
 - Engaged with EHC and internal position adopted



Each Home Counts / QM (TM v2)

- Numerous discussions with EHC & TM to explore working together
- Included Implementation Board and BEIS facilitated meetings
- Progress slow and desire for coordination / alignment seemed limited
- Only option proposed for single QM was single-entity via a full merger
- Commissioned independent consultant to define all options
- Extensive Board / Trustee meeting to decide position



MCS / TM Options

Options

1. MCS aligns to create single entity
2. MCS aligns to provide QM provider (operational)
3. MCS aligns to provide ownership status with QM
4. MCS operates alongside QM (Joint or parallel licence)
5. MCS continues to operate alongside QM

Considerations

- Consumer benefit
- Consumer protection
- Risk to MCS as a scheme, and a business (MCSSCO)
- Acceptability under Charity law
- Practical barriers



MCS / TM Conclusions

- Only 2 possible options:
 1. MCS operates inside QM (Joint or parallel licence)
 2. MCS continues to operate outside QM
- Given express wish of all that there should be a joined-up approach, we've formally written to BEIS to:
 - Clarify which of the above it will support
 - Publicly confirm to industry & stakeholders MCS is the quality mark for Microgeneration





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Compliance & Enforcement

Ben Howe, MCSSCo Compliance &
Enforcement Manager

Some background

- One of the first MCS assessors at BRE
- Over 2 years working on the scheme from 2008
- 4+ years as Renewables Survey Manager at Mark Group
- 20+ years in sustainable energy - commercial energy auditing (ESOS, DECAs); M&T; M&V; energy contracts



MCSSCo – post novation

- Licence Agreement obligation on the MCSSCo to investigate complaints
- Historically, scheme administrator acted as ‘one-stop shop’, with complaints only handled by Cert Bodies and Consumer Codes
- Led to poor outcomes and higher costs to the scheme
- Implementation of new complaints process
- ‘Whistle-blower’ complaints fell through the cracks



MCSSCo – post novation

- Consequentially:
 - Industry frustration at not exercising the powers available in the Licence Agreement
 - Complaint data lacked clarity, with little statistical vigour making management decisions impossible
 - Consumers given unrealistic expectations of what the MCS could achieve
 - Inconsistencies and costs of trying to coordinate all complaints meant poor value for money



The New Complaints Process

- A fresh, simplified, effective approach
- Investigations by CBs ('post-sale/ installation') & CCs (pre-sales) initially
- 2 categories:
 - Consumer complaints
 - Whistle-blower complaints
- New infographic on MCS website
- Drawing on the broader compliance provisions in Licence Agreement for bringing the scheme into disrepute
- Compliance & Enforcement Manager role:
 - Potential for 'fees for intervention' and
 - The ultimate sanction – withdrawal of MCS licence



Reactive & Proactive Investigations

- In addition to addressing customer complaints escalated directly to Helpdesk...
- Proactive investigations based on risk factors, using data in consolidated complaints log – ‘complaint ratio’
- Recent proactive case – full investigation of a PV installer with high CR
 - QMS found to be lacking
 - Follow-up actions requested, to be fed back to installer’s CB and CC
 - On-going monitoring of installer and complaints



Whistle-blower Cases

- As 1 person, I will be prioritising cases
- Feedback via Certification Body Forum
- Improvement of scheme standards
- Recent case 1:
 - PV installer photographed not using scaffolding or PPE while working at height
 - Installer investigated at their offices, with follow-up
 - Feedback to installer's Cert Body to be considered for subsequent MCS surveillance assessments



Whistle-blower Cases

- Case 2:
 - Reports from major roofing contractor regarding a PV installer's practices – old case, having fallen through the cracks
 - Allegations of non-compliant installation of in-roof modules & frames, brackets, support battening, flashing
 - Potential impact on wind-loading and water ingress
 - 14 days for installer and Cert Body to respond with evidence
 - Investigation due later this month





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Thank you

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