

**Q1. Respondents are asked to provide any comments or evidence they have in relation to the equality impact of the proposed changes.**

**No comments from CES.**

**Q2. Do you agree that the final date for schemes bids to be submitted to the Programme Administrator should be put back to 31st December 2012 to allow more time for schemes to be developed following this consultation?**

**Yes CES agrees with this proposal.**

**Q3. Do you agree that the NISEP funding should remain static at the 2012-13 level until the NISEP is reviewed or a new energy efficiency measure is introduced?**

**Yes CES agrees with this proposal.**

**Q4. Do you agree that Solar PV should be the only type of renewable energy measure approved for NISEP schemes? (Bearing in mind that, as per Section 2.1 of the Framework Document, measures promoted must be in customers financial interest i.e. the present value of the lifetime customer benefits should exceed the cost of the measures.)**

**Yes CES agrees with this proposal, although we would be keen to see what other renewable technologies emerge.**

**Q5. Do you agree that a 10% ring-fence of funding for innovative and renewable energy measures (Solar PV), is more appropriate than a 5% ring-fence for renewable (Solar PV) and a 5% ring fence for innovative?**

**Yes CES agrees with this proposal.**

**Q6. Respondents are asked to comment on what the appropriate level of incentives should be for delivery of NISEP schemes.**

**CES supports the continuation of a full incentive mechanism and would not support the dilution of this through the proposed pro-rata system.**

**Q7. Do you have any comments on or issues with the revised Accedence Document contained in Appendix 8 of Annex 1?**

**This has not had consideration by CES legal department, and therefore we cannot comment. However we do note that the new requirement to sign the Accedence Document every year will add additional legal and admin costs to organisations every year which would not be welcome.**

**We think it would be beneficial for the Accreditation Document to show a timetable of key dates during the year.**

**Q8. Do you think that the guidance regarding compliance with State Aid, now contained within the Framework Document, is clear and adequate?**

**CES assumes that the Utility Regulator has understood State Aid requirements and therefore has no comments to make.**

**Q9. Do you have any comments on the additional clarification in the Framework Document regarding procurement arrangements, sub-contracting arrangements and partners?**

**Procurement should be fair; in return CES request that approvals are communicated in time, to allow for the procurement process outlined in advance of the funding year.**

**The value for money can be at odds at having a number of different installers. Having a range of subcontractors can be less cost effective than having one sub contractor.**

**CES require clarity on how to avoid the distortion of competition. For example does it depend on the size of the scheme or only the amount of work given to each subcontractor?**

**How are Primary Bidders to deal with employing additional subcontractors who have not satisfied the award criteria purely in order to avoid the distortion of competition?**

**If only a small number of contractors meet your award criteria does the Primary Bidder have to employ lower scoring contractors to avoid distortion of competition?**

**Q10. Do you have any comments on the revised Section 2.5, Payment of NISEP Funding, in the Framework Document?**

**No comment, CES welcomes the move to monthly payments.**