CONSULTATION RESPONSE FORM

MIS 3005-D: The Heat Pump Design Standard

Thank you for taking the time to comment on this consultation. MCS values the input from all interested parties in the development of its Standards as without you we would not be able to define and raise the quality of installations. We would be grateful if you could use this form for your response which helps with collation and consideration of the feedback. The form is in two parts: the first part includes a table where you can make comments on each line/paragraph of the draft document; the second part includes specific questions that will help arrive at a final published version.

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| Introduction:  MCS are consulting on changes to MIS 3005-D: The Heat Pump Design Standard which aim to clarify the circumstances under which a hybrid heat pump heating system would be compliant with MCS requirements.  MCS is now consulting on the proposed changes to MIS 3005-D which include:   * The introduction of a definition of a hybrid heat pump system * The removal of the requirement that a heat pump should be selected that will provide at least 100% of the calculated heat loss when installing a hybrid heat pump system * Introduction of the requirement for a minimum 55% peak power output contribution from the heat pump at a 55°C flow temperature and at design conditions when installing a hybrid heat pump system   This consultation also seeks feedback on whether the heat pump should always be prioritised in a hybrid heat pump system or if there should be a set minimum of heat supplied from the heat pump. |

| Respondent Names: | Company Name: | Date | Document |
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| **Barry Sharp**: Chair of SNIPEF Low Carbon Forum  **Scott Sanford**: SNIPEF Technical Manager  Fiona Hodgson: Chief Executive, SNIPEF | Scottish and Northern Ireland Plumbing Employers Federation (SNIPEF) | 8 March 2024 | MIS 3005-D |

**Consultation Questions:**

1. Do you agree with the amendments to the requirements for hybrid heat pump heating systems?
   1. **Yes**
   2. No (please explain why)

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| SNIPEF supports the proposed amendments to the requirements for hybrid heat pump heating systems, recognising their potential to enhance system efficiency, promote sustainability, and facilitate the transition to renewable energy sources.  These changes are anticipated to streamline the adoption of heat pump technologies, aligning with SNIPEF/profession goals for greater environmental and sustainability awareness and energy efficiency.  SNIPEF believes that the amendments offer a pragmatic approach to improving heating systems' performance, encouraging innovation, and meeting the government's installation targets. |

1. Do you agree with the definition of a hybrid heat pump system stated in 5.5.2?
   1. **Yes**
   2. No (please explain why)

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| SNIPEF supports the definition of a hybrid heat pump system.  We find it accurately reflects the integration of heat pump technology with supplementary heating, providing a clear standard for industry adherence. This definition ensures uniform understanding and supports the deployment of efficient, sustainable heating solutions.  SNIPEF endorses this clarity in standards for promoting innovation and environmental sustainability within the heating sector. |

1. 5.5.2 d), Do you agree with the minimum contribution from the heat pump being 55% kW of the peak output at design condition at a 55 degree C flow temperature?
   1. Yes
   2. **No (please explain why)**

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| SNIPEF does not agree with the minimum heat pump contribution of 55% at a 55°C flow temperature. We believe an 80% threshold aligns better with long-term sustainability goals and the push for greater reliance on renewable energy.  This higher standard encourages innovation, drives technological advancements in heat pump efficiency, and significantly reduces carbon emissions. Setting the bar at 55% may shortchange the potential for energy savings and environmental impact.  An 80% minimum ensures heating systems are forward-thinking, promoting a swift transition towards more sustainable solutions and supporting the government's target for heat pump installations.  SNIPEF advocates for this adjustment to foster a robust commitment to energy efficiency and environmental stewardship, marking a vital step in our journey towards a greener future. |

1. 5.5.2 e) Do you agree with this amended language or do you think the heat pump should always be prioritised?
   1. **Yes**
   2. No (please explain why)

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| SNIPEF supports the revised language, recognising the importance of a mandatory requirement to ensure that heat pumps can provide at least 100% of the calculated heat loss. This change aligns with our commitment to rigorous energy efficiency standards and the broader objective of decarbonisation.  Mandating the selection of heat pumps that can fully meet a building's heating needs without supplementary electric heating underscores the industry's move towards sustainable, low-carbon solutions. While we acknowledge the importance of flexibility in system design, the urgency of addressing climate change and meeting ambitious carbon reduction targets necessitates a decisive approach.  By making this requirement mandatory, we ensure a consistent, high level of performance across all new installations, driving innovation and encouraging the development of more efficient heat pump technologies.  SNIPEF believes that adopting "**shall**" in this context is crucial for accelerating the transition to energy-efficient heating systems. This will ultimately reduce fossil fuel dependence and enhance the UK's energy security. |

1. 5.5.2 f), Should we set a minimum of how much the heat supplied should be from the heat pump?
   1. **Yes (please explain why)**
   2. No (please explain why)

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| SNIPEF supports setting a minimum threshold for the heat pump's contribution in hybrid systems, advocating for a standard that promotes sustainability and efficiency.  Considering the proposal for an 80% minimum (as highlighted in Q3), such a benchmark aligns with environmental goals and encourages renewable energy use.  SNIPEF believes that this approach ensures hybrid systems are designed for maximum efficiency and minimal carbon emissions, fostering innovation in heat pump technology.  Establishing a clear minimum is crucial for advancing green heating technologies, reducing reliance on fossil fuels, and meeting broader objectives for a sustainable energy future. This position reflects our own commitment to enhancing industry standards and environmental stewardship. |

1. 5.5.2 f), Should it be possible to supply 100% of the heat to the property from the alternative heat source?
   1. **Yes, what circumstances should that be acceptable? (i.e. if the heat pump fails?)**
   2. No (please explain why)

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| SNIPEF supports the capability for hybrid systems to supply 100% of a property's heating needs from an alternative source.  Inspired by Sweden's approach of an 80% heat pump contribution supplemented by electric backup, we advocate for flexible, adaptable solutions that account for each location's unique infrastructure and demand profiles. This approach facilitates effective heat pump integration, aligning with broader decarbonisation objectives while navigating the practicalities of energy supply and demand. |