

Installers Representative Panel
c/o Jimmy Egan
Hi-Speed Gas Ltd
Unit 6, Bluebell Business Park
Old Naas Road
Dublin 12.
22/10/2007

Mr Eamonn Murtagh
Commission for Energy Regulation
The Exchange Building
Belgard Square North
Tallaght
Dublin 24

Dear Eamon

The following is a submission on behalf of the Installers Representative Panel in response to your consultation paper

"The Regulation of the Gas Installer Industry with Respect to Safety" CER/07/125
The Installer Representative Panel is an elected panel set up to represent installers. The current panel was selected in November 2006 and will serve a term of two years from January 2007 until December 2008. The election process was independently conducted by Deloitte & Touche and all Registered Gas Installers were given the opportunity to vote.

The Installers Representatives are

Chris Ahearne	087-2535188	Midlands/Limerick	chrishaearne@eircom.net
Pat Kelleher	087-2598933	Cork/South	info@patkelleherandson.ie
Pat O'Shaughnessy	086-8102017	North East	cgpltd@eircom.net
James Brereton	086-2569754	Dublin	elainebrebreton@eircom.net
Sean Giffney	086-2582357	Dublin	gasjunction@eircom.net
Jimmy Egan	086-2330200	Dublin	Jimmy@hsg.ie

4.3 Training

We would like the CER to put in place a system, where apprentices as part of their apprenticeship are given the opportunity to complete a GID, allowing them to be fully qualified in gas on completion of their apprenticeship.

4.4.3 Analysis of current regime

“There are an estimated 5,000 installers operating within the Republic of Ireland with only circa 16% of these being members of the RGI”.

The Installers Representative Panel believes that more research needs to be conducted into these figures as they will be fundamental to all costing and planning for the operation of the new body and accurate figures will be required to produce a business plan

5.1 Gas safety framework

The Installers Representative Panel believes that the CER should consider bringing into phase one the regulation of LPG installers. We believe that this could also increase the pool of installation and installers where revenue can be acquired for the Regulatory Body and in turn reduce the cost of certificates.

6. The Criteria Document

“To enable the appropriate level of industry involvement, the Commission intends to establish an industry forum, called the Criteria Review Panel for the Regulation of Natural Gas Installers (CRP)”

The Installers Representative Panel would like its representatives to be included in the Criteria Review Panel.

7.2 Characteristics and Financial Structure of the Supervisory Body.

- ❖ The Installers Representative Panel would have a preference for the Supervisory Body to operate on a not for profit basis as we believe this would keep the cost of certification to a minimum.
- ❖ We would like the cost of different types of certificates to be cost reflective in relation to the different types of work to be undertaken
- ❖ We would like the cost of the certificates to be shown separately similar to the WEE charges. This would make customers aware of the certificates and their cost, while in the long term keeping a focus on reducing the cost of the certificates
- ❖ The CER should also factor into the public cost of the certificates an administration charge for the installer.
- ❖ Will the certificates be subject to V.A.T.?

7.4 Designation of the Supervisory Body

The cost of setting up the Designated Supervisory Body and the cost of any promotional campaign in relation to the promotion or establishment of its Logo or any public awareness safety campaigns should not be added into the cost of the certificates.

The CER should retain all right to the name, logo, computer system and data used by the body.

8.2 Certification of Gas Works

The Installers Representative Panel requires all servicing work to be exempt from certification.

“5. It will be a requirement of the new regime that new connections (or reconnections) to the gas system will require an appropriate Completion Certificate prior to Bord Gáis Networks making gas supply available at the dwelling or premises.”

Bord Gais currently operates an admit gas system for Registered Gas Installers. This system allows these Registered Gas Installers to admit gas into people's homes and return a Declaration of Conformance to Bord Gais within 10 days. The Installers Representative Panel requires this practice to continue. It is very much a practical solution allowing customers to use their heating systems quickly after an installation rather than have long delays in waiting on Bord Gais to call to admit the gas.

9.1 Membership Categories

The Installers Representative Panel would like to see a 6 Month time limit placed on provisional membership and we believe that these provisional members should be allowed to self certify during these six months.

The CER should make it an immediate priority to make available GIND courses as currently none are available making it impossible for a large number of non domestic installers to meet the criteria for registration.

The CER should enter into discussions in order to ensure mutual recognition of its Registered Gas Installers in the UK and Northern Ireland.

10. Public Awareness

The Installers Representative Panel require all public awareness campaigns to be funded from sources other than monies received by the Regulatory Body from the issuing of certificates

11.2 Training

The Installers Representative Panel request that an installer's representative be given a place on the Gas Training Development Group.

Yours sincerely



Chris Ahearn

Pat Kelleher

Pat O'Shaughnessy

James Brereton

Sean Giffney

Jimmy Egan

