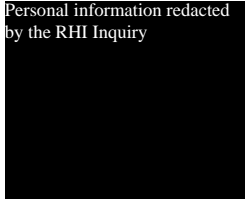


Andrew Crawford

Personal information redacted
by the RHI Inquiry



By post and email (Personal information redacted by the RHI Inquiry)

30 March 2017

Dear Sir

**Re: The Independent Public Inquiry into the Non Domestic Renewable Heat
Incentive (RHI) Scheme**
**Provision of a Section 21 Notice requiring the provision of evidence in
the form of a written statement (No 1)**

I am writing to you in my capacity as Solicitor to the Independent Public Inquiry into the Non Domestic Renewable Heat Incentive (RHI) Scheme (known as 'the RHI Inquiry') which has been set up under the Inquiries Act 2005 ('the Act').

I enclose a copy of the RHI Inquiry's Terms of Reference for your information; although I appreciate that you may already be familiar with these.

The RHI Inquiry is now conducting its investigations into the matters set out in its Terms of Reference. A key part of that process is gathering all of the relevant documentation from relevant departments, organisations and individuals.

In turn, an important part of that exercise involves seeking to ascertain the relevant means of communication used by those persons whose actions may fall within the purview of the RHI Inquiry's investigation, in order that the Inquiry can seek to ensure that it has been provided with all documentation relevant to its work; and in

order that it may take any necessary steps to identify, secure and retrieve such documentation.

In keeping with the approach we are taking with other individuals, the RHI Inquiry is now issuing to you a Statutory Notice (known as a 'Section 21 Notice') pursuant to its powers to compel the provision of evidence in the form of a written statement in relation to the matters mentioned above.

The Section 21 Notice enclosed with this letter requires you to provide evidence to the RHI Inquiry Panel in the form of a written statement addressing the matters identified in the Schedule to the Section 21 Notice. As the text of the Section 21 Notice explains, you are required by law to comply with it.

If it would assist you, I am happy to meet with you and/or your legal representative to discuss the requirements of the Section 21 Notice and what evidence you may be able to provide which is within the scope of the Section 21 Notice.

As you will see, part of the information sought by the Section 21 Notice is whether you have knowledge of any communications in relation the RHI Scheme, such as emails or text messages, that may have been deleted or otherwise rendered potentially unavailable or irretrievable. I wish to emphasise that you should not consider the making of this request to imply any form of wrongdoing on your part. Such a request is a standard request to be made to individuals who may have relevant communications relating to the RHI Scheme and who are in receipt of a Section 21 Notice requiring the production of such communications. It is simply designed to ensure that the RHI Inquiry is made aware at the earliest opportunity whether steps may have to be taken to recover any such communications.

You will also find attached to the Section 21 Notice a Guidance Note explaining the nature of a Section 21 Notice and the procedures that the RHI Inquiry has adopted in relation to such a notice.


Given the tight time-frame within which the RHI Inquiry must operate, the

Chairman of the Inquiry would be grateful if you would comply with the requirements of the Section 21 Notice as soon as possible and, in any event, by the date set out for compliance in the Notice itself.

Finally, I would be grateful if you could acknowledge receipt of this correspondence and the enclosed notice by email to Patrick.Butler@rhiinquiry.org.

Please do not hesitate to contact me to discuss any matter arising.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Patrick Butler', is written over a horizontal line.

Patrick Butler

Solicitor to the RHI Inquiry

02890408928

SCHEDULE**[No 71 of 2017]**

1. Identify all email addresses used by you (or used by others on your behalf) to send or receive communications in relation to any matter relating to, or touching upon, the RHI Scheme.
2. Identify all telephone numbers used by you (or used by others on your behalf) to send or receive text communications in relation to any matter relating to, or touching upon, the RHI Scheme.
3. Identify all social media accounts or platforms (if any) used by you to send or receive communications in relation to any matter relating to, or touching upon, the RHI Scheme.
4. Specify whether you are aware of any communications relevant to the RHI Inquiry, such as emails or text messages, that may have been deleted or otherwise rendered potentially unavailable or irretrievable.
5. If you are aware of any communications relevant to the RHI Inquiry, such as emails or text messages, that may have been deleted or otherwise rendered potentially unavailable or irretrievable, then please provide full details of any such communications.
6. Excluding Departments of Government (both at Westminster and devolved), civil servants employed within those Departments (although not including Special Advisers), GEMA/Ofgem and consultancy firms engaged by Departments of Government, please identify any individual or organisation that you consider may have, or may once have had, documentation or information relevant to the matters being investigated by the RHI Inquiry. In respect of any such individual or organisation please set out the basis for your belief.



INQUIRY INTO THE RENEWABLE HEAT INCENTIVE SCHEME

RHI REF: Notice 71 of 2017

DATE:

Witness Statement of Andrew Crawford

I, **Andrew Crawford**, will say as follows in response to the matters raised in the attached Schedule using similar numbering to that appearing therein :-

1. Personal information redacted by the RHI Inquiry; andrewcrawford@dup.org.uk; andrew.crawford@daera-ni.gov.uk; andrew.crawford@dfpni.gov.uk and andrew.crawford@detini.gov.uk
2. Personal information redacted by the RHI Inquiry and 07825141569 (Departmental mobile telephone)
3. None
4. I have deleted email communications touching upon or relevant to RHI.
5. I do not have a clear recollection of the details or timing but believe the material would have been confirmatory of what was in the public domain, and being expounded by interested parties, regarding the amendment of the scheme in 2015.
6. Aside from individuals or organisations that may be identified from the documents I have produced, I am unable to specifically identify any other individuals or organisations that are not already either in the public domain or excluded from the terms of this question.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: Andrew Crawford

Dated: 4th May 2017