

From: [Wayne Cullen](#)
To: [NI RHI](#)
Cc: brian@bsholdingsltd.com; eddie@bsholdingsltd.com
Subject: Re: rhi questions
Date: 03 October 2012 13:20:26

For the attention of Peter Hutchinson

Peter

To date BS Holding Ltd have a potential for bio fuel system sales of over one million pounds and this figure is growing each day all subject to RHI. We would appreciate a meeting with you to ensure that we can make all preparation for an application process and have a common understanding of any potential issues with no surprises.

I hope you can see us soon to discuss same.

See below previous correspondence on subject

Regards//Wayne

Wayne Cullen
BS Holdings Ltd

Personal information redacted by the RHI
Inquiry

www.bsholdingsltd.com

From: [Wayne Cullen](#)
Sent: Wednesday, September 26, 2012 1:46 PM
To: ni.rhi@detini.gov.uk
Cc: brian@bsholdingsltd.com ; eddie@bsholdingsltd.com
Subject: Fw: rhi questions

For the attention of Peter Hutchinson

Dear Peter

Thank you for the consultation time yesterday it was informative and interesting. The following are some aspects I feel should be considered moving forward.

Clarification is required regards simple metering. We were advised from the English rhi department that an external biomass plant in a building within a short distance (by this we presume 1-2mts) of the heated building (the load) could be accepted as simple metering. The pipe work between would be a trivial heat loss when properly insulated to modern standards (approx max 15watts/metre). We appreciate that longer distances become questionable but such short distances would appear to us to be acceptable to be classed as simple metering.

Clarification is required in complex metering where a competent person is required to verify metering installations. The legislation refers to B&ES for metering standards and being a

member of that group and attended their discussion forum on the subject, I am familiar with their work, I am also aware that as of last month there was only one meter assessor with B&ES in N Ireland, so I see this as an impediment to other installers. With the series of questions arising at today's meeting regards dual fuel meter / systems, I can foresee metering will be an area requiring further focus by your department if N Ireland is to improve on the GB installer pitfalls.

The scheme recognizes that in house accreditation of competent persons on metering is possible, what process is in place to achieve that as I see it as the obvious step for installers of schemes.

Planning and building controls regulation could be an impediment for commercial installations. PPS18 permits domestic installations where conditions are met, these are listed in PPS18, is it government intention to do something similar on commercial systems?

Approval of an rhi scheme is absolutely necessary so that owners and board directors can make decisions in N Ireland on assured facts for any financial planning they may have, presently to achieve RHI only after install, where a company or plant owner has invested large sums of money only to be told it does not comply is not acceptable. We have one such blue chip customer who has an annual heating oil charge of £380,000. Their board must approve a £500,000 spend for biomass plant coming in at 980kw so it will fall under the 1Mw threshold therefore presently under these regulations we could not even get preliminary approvals. The board would not be able to approve a spend based upon anything other than firm binding commitment. As an example of legislation already in place in the building industry, presently as a BRE commercial energy assessor we are required to complete a design sbem for building control submission before they will approve the plans, this shows the building should comply if installed as shown, upon completion a further demonstration sbem is provided showing it was installed as designed and does comply, building control can then sign off upon it. Something along these examples should be embodied in RHI.

Class 2 metering is problematic, suppliers of meters in NI are currently unfamiliar with standards. We recently built a 75kw demonstration biomass plant and asked the largest commercial wholesaler group in N Ireland to provide a class 2 meter, we received a class 3 and they could recognize what the differences were. It is also necessary for those suppliers and installers to recognize that any mixture of standard water using glycol or corrosion inhibitors alters the density of the water hence the meter will become less accurate. Density of water mixture must be given to the meter manufacturers to be suitably adjusted before installation. This is not noted that we could see in the regulations and will be a future problem.

Please clarify the use of liquid heating conversion to warm air to heat properties (the use of fan coil heaters or hot water air handling units to heat large open plan buildings such as machine shops, storage warehouses), is this permissible in present regulations?

Regards

Brian Hood

Personal information redacted by the RHI
Inquiry