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Update to the 2012/13 parts of the NI RHI Feasibility Study

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DETI/01

Publication date:5th October 2012**Contact:** Paul Heigl**Team:** NI RHI**Tel:** 020 7901 7316**Email:** paul.heigl@ofgem.gov.uk**Overview:**

This update is to be read in conjunction with the original Feasibility Study that was published in December 2011. It identifies those areas that are either in addition or constitute a change to the original scope of that Feasibility Study. This paper sets out the proposed direction of the NI RHI with regards to resources, IT and Legal requirements and costs. It documents the changes in scope, assumptions, dependencies and timings for delivery.



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Context

The original feasibility study for the NI RHI was conducted in December 2011 anticipating an April 2012 launch. However, due to a combination of the delay in the launch of this scheme and more certainty as to how the scheme will be administered than when the original feasibility study was submitted to DETI, the scope and plan for delivery has been updated. This report aims to illustrate changes in scope, resourcing, delivery timings and cost.

The scope has changed since the original feasibility study and is now more in line with that seen on the GB RHI scheme. The inclusion of Air Source Heat Pumps (ASHPs) as an eligible technology has now been removed from the draft NI regulations as has the inclusion of the 17 heavy industrial sites in Northern Ireland.

The delivery deadline for the project (Figure 2) has now been changed to be no earlier than 1 November 2012 and our NIRHI development team have reassessed the costs for delivery, these are discussed in detail within this document.

Associated documents

GB Renewable Heat Incentive Guidance Volume One: Eligibility and how to apply.

http://www.ofgem.gov.uk/e-serve/RHI/howtoapply/Documents1/RHI_Guidance_Document_Vol_One.pdf

GB Renewable Heat Incentive Register – User Guide.

<http://www.ofgem.gov.uk/e-serve/RHI/howtoapply/Documents1/RHI%20Register%20User%20Guide.pdf>

Summary of support information for RHI applicants.

<http://www.ofgem.gov.uk/e-serve/RHI/howtoapply/Documents1/Summary%20of%20supporting%20information%20for%20RHI%20Applicants.pdf>

GB Renewable Heat Incentive Fuel Measurement Questionnaire.

<http://www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=25&refer=e-serve/RHI/howtoapply>

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Executive Summary

- i. As a result of DETI's delay in instructing us to start development of the NI RHI and due to changes in scope, we have needed to review and update the original NI RHI Feasibility Study, submitted to DETI in December 2011.
- ii. The core of the deliverables and activities stated in the original Feasibility Study, submitted to DETI in December 2011, are still valid but with some changes. In reviewing these, we have also taken account of our improved knowledge of scheme operations and costs since the original study was completed.
- iii. Changes to the original study are listed in this document. This should be read in conjunction with the original feasibility study document. Changes include:
 1. The scheme is planned to go-live on 1 November 2012;
 2. DETI have confirmed that there will be no separate treatment of large industrial customers and that air source heat pumps will not yet be included in the RHI, but also that biomass installations above 1MW will be ineligible;
 3. In order to contain IT costs, changes to the RHI Register (IT system) will still need to be done in conjunction with changes being made to the GB RHI. These changes are expected to take place in January-February 2013 and so in the interim period between 'go-live' and February 2013 we will be running a manual administration process. This is discussed in more detail in Chapter 4;
 4. As forecast in the feasibility study, the IT cost forecast has decreased from £286,000 (£143,000 plus 100% contingency) down to £190,000 (including 33% contingency). This is because we have been able to scope the IT requirements in more detail, having received confirmation of policy from DETI. We will need to receive agreement to the full £190,000 in order to deliver IT changes for the end of January 2013;
 5. Due to greater certainty regarding the regulations and their similarity to the GB scheme regulations we have been able to revise legal costs downward from £186,000 (£62,000 plus 200% contingency) to £67,000.
 6. We have managed to reduce other development costs by £5,000, in effect meaning that contingency funding is not needed for any development costs other than IT development costs. In total we have therefore reduced the forecast funding required from £772,000 (£386,000 plus 100% contingency) down to £433,000;
 7. We have included support to DETI to conduct stakeholder consultation sessions on the guidance document. This consists of a 4 week consultation period with two engagement sessions (Belfast and Western Northern Ireland).
 8. 2012/13 operating costs are forecast at £140,000 (a £5,000 increase). The costs associated with operating a manual process until the end of January 2013 have outweighed savings from part year operations.

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1. Key working assumptions

Chapter Summary

This chapter sets out the changes to the key working assumptions that had previously formed the basis of the work we were to undertake for the development and implementation of the NI RHI.

Legal framework

NI RHI Regulations

- 1.1. A key working assumption of this update to the Feasibility Study is that DETI will finalise the regulations governing the NI RHI, detailing the scheme functions and which body will be responsible for administering the scheme. It will be DETI's responsibility to ensure that the regulations are in place in time for scheme launch on 1 November 2012.
- 1.2. The costs and delivery timeframes cited in this paper are provided on the basis of the draft regulations shared with us on 13 September 2012. If final scheme policy and regulations differ considerably from those draft regulations on which this update has been based, DETI and we will have to re-negotiate the costs and delivery timeframes possible based on the final detailed policy position.
- 1.3. We will make every effort to prevent any impacts on scheme cost and delivery in the event of issues arising in DETI finalising the regulations providing we have adequate time to review them. However should delays occur due to regulations are not yet being in place, we may require funding to cover any consequent cost overruns.

Changes in scope

- 1.4. The broad approach is consistent with the GB RHI scheme. However there are some key differences from that outlined in the Feasibility Study:
 - we are no longer developing solutions to the inclusion of Air Source Heat Pumps (ASHPs) and the 17 Heavy Industrial Sites; and
 - Technologies using biomass >1MW are excluded from the NI RHI scheme. Deep geothermal including CHP and heat pumps if >1MW are not excluded however.
- 1.5. A key assumption of this update to the Feasibility Study is that the timeframes for delivery outlined throughout this update report are based on the current scope. Any changes to this scope will need to be examined in relation to how they will impact on the current approach and recommendations.
- 1.6. Additional feasibility work may be necessary to define the resource requirements before IT systems development and guidance and business processes can be finalised.

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Fraud Risk

- 1.7. We have undertaken an assessment of the feasibility of the NI RHI on the assumption that the level of fraud risk is the same as that for the GB RHI. This will be reassessed during this Development phase following an independent risk assessment to identify key areas of risk to the scheme including any local factors that may require a different approach to the GB RHI. As agreed with DETI, we deferred the independent risk assessment planned for the Feasibility Phase as the areas of highest risk were not reflected in the draft regulations.
- 1.8. Any change to that risk assessment may have implications on existing fraud prevention measures and auditing and associated costs.

Scale

- 1.9. The expected volume of generators for the NI RHI scheme is difficult to predict and the uptake from generators will very much depend on the level of tariffs set, the administration systems for the scheme, the efficiency of the scheme and, of course, the desire for renewable technology.
- 1.10. The NI RHI represents up to £25 million of investment in the Northern Ireland renewable heating sector over the first four years of the scheme.
- 1.11. For the purposes of this update we have been advised by DETI that the uptake figures provided in the original Feasibility Study are still consistent with those listed in Table 1 below.

Table 1: Forecast NI RHI scheme uptake

NI RHI	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Total Non Domestic	0	247	498	931	1,628	2,175	2,990	3,836	5,017	6,291

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2. Key Dependencies

Chapter Summary

This chapter sets out the key dependencies that form the basis on which we are progressing with the development of this scheme.

2.1. This update to the feasibility study has been drafted based on assumptions agreed with DETI and it has been prepared on the understanding that we will work towards a November 2012 launch date provided the following conditions are met:

- **DETI will affirm their NI RHI regulations in parliament they will be brought into force by 1 November 2012;**
- **DETI will confirm, in writing, their agreement to the Administrative Arrangement between Ofgem and DETI before the launch of this scheme;**
- **we can draw down adequate funds from DETI to cover all tariff payments on time by 1 February 2013;**
- **DETI will confirm their commitment to cover the development costs of the scheme, £433,000, and the agreed administration costs for the ongoing administration of the scheme, £140,000 for 2012-13, by 29 October 2012.**

Should there be delays in gaining these approvals and key dependencies, this could result in a delay to the delivery of this project and ultimately impact on the 'go-live' date.

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3. Development Team

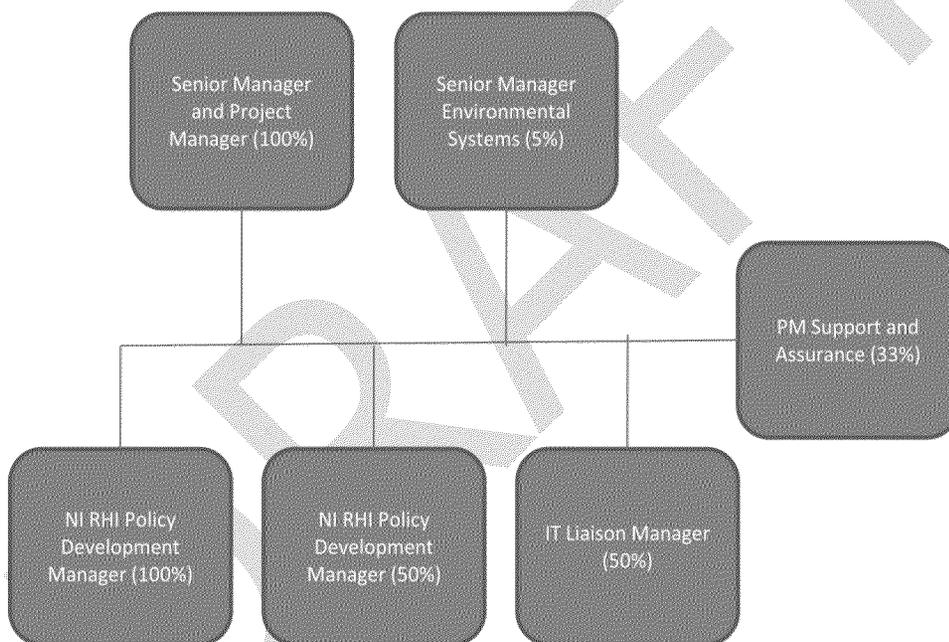
Chapter Summary

This chapter discusses the additional resourcing requirements for the development of the NI RHI scheme compared to that seen in the Feasibility Study.

Resources

3.1. The update to that seen in the Feasibility Study is that the Senior Manager and Project Manager’s input to the development team has been increased from 50% to 100% (Figure 1) in order to ensure that the complex deliverables and tight deadlines are achieved.

Figure 1: Proposed NI RHI Development Team



Deliverables

3.2. The deliverables for the NI RHI have not changed significantly since those scoped out during the Feasibility Study, but a more exhaustive list is provided in Table 2 below. A delivery plan can be seen in Figure 2 below.

Table 2: NI RHI deliverables

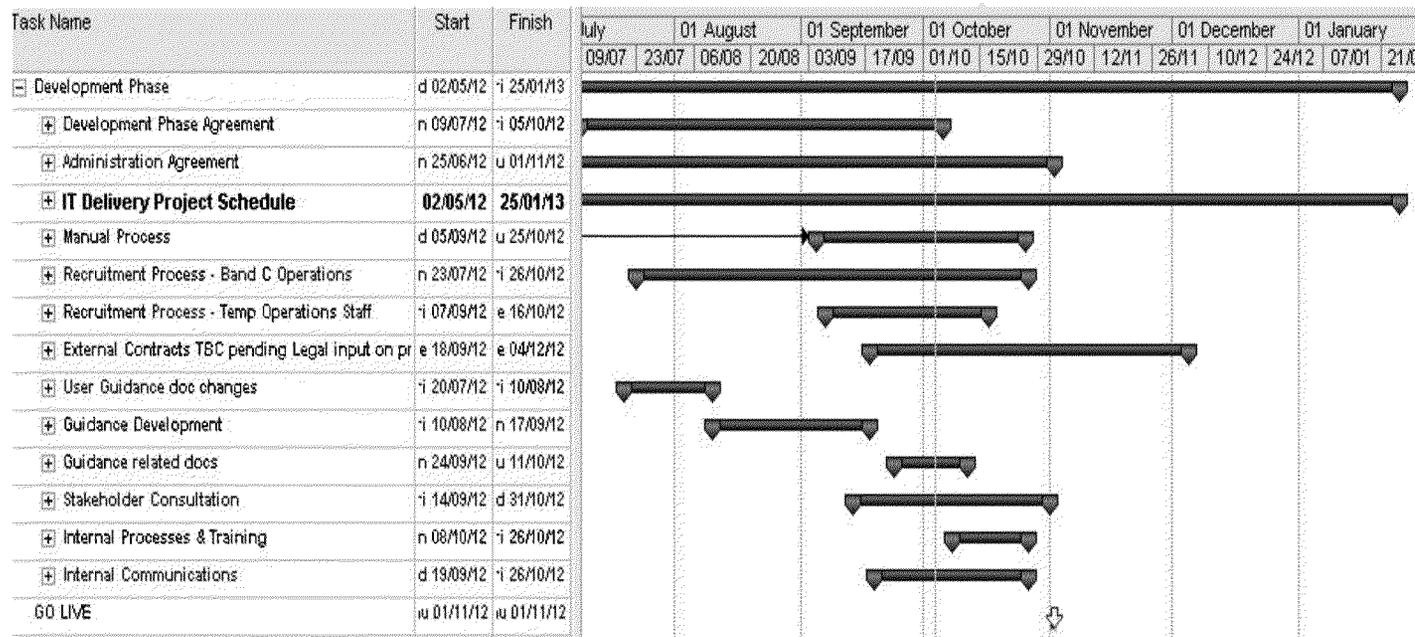
Business and operational Development	IT Development
Administrative Arrangement between Ofgem	Finalise Administrative Arrangement and

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and DETI	payment recovery process with DETI
Revision of the Development Phase scope, resource requirements and costs.	Recruiting additional resources
Revise operational cost forecasts using current data	Extending current audit and procurement contracts to include NI RHI
Update existing internal RHI operational procedures, manuals and call lists to include the NI RHI processes	Risk assessment and assurance
Update all external user guides and additional information for NI RHI participants	IT system development, testing and release
Design, test and implement an interim manual solution for accreditation of NI RHI participants	
Internal staff training on the interim manual solution and key differences between the NI and GB schemes	
Procurement of Ofgem administered external contracts for effective operation of the NI RHI	
Staff recruitment	
Regular contact meetings between Ofgem and DETI to direct project specific issues.	

3.3. We envisage that this development team will be formed in July 2012 and be required until November 2012. However it will be necessary to extend some of the team beyond this period, for instance, through to February 2013 for the IT release, or their remit expanded before this time in order for it to undertake development work for subsequent phases of the NI RHI scheme.

Figure 2: NI RHI Delivery timetable



Recruitment Need

- 3.4. There is a need for a permanent full time Operations Manager recruited at Band C for once the NI RHI scheme is operational. This post will be located in our Glasgow Office. Although this is an operational position, the recruitment process will occur during this development phase and therefore the recruitment costs must be reflected here. The rest of the operational resource will be taken as a proportion of our GB RHI operational team.

Recruitment Cost

- 3.5. The additional costs of recruiting the Band C Operations Manager will be provided from within the Development Team Resource budget.

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4. Manual Solution

Chapter Summary

This chapter maps out how we will administer the NI RHI scheme manually until an effective IT system can be implemented.

Context

- 4.1. DECC have announced that they will be making amendments to the GB RHI legislation in January 2013 to primarily streamline the accreditation process for generators and will include significant extensions to the scheme, such as regarding air quality, biomass sustainability and substituting long term cost control provisions for the interim ones that come into force in July 2012.
- 4.2. In order to maintain NI RHI development costs close to the Feasibility Study forecast, we will need to administer the scheme manually until the existing GB RHI IT system can be amended to incorporate the changes listed above. By 'piggybacking' the NI RHI IT system changes on those being made by the GB scheme we are able to reduce standalone change costs by £35,000.

The Manual Process

Accreditation

- 4.3. The manual application and preliminary application forms have both been developed previously for the GB scheme as contingency measures for if the IT system failed, they are available to download from our website or can be posted out to applicants if they contact us. We will be simply adapting these forms to be appropriate to the NI RHI scheme.
- 4.4. NI RHI applicants will need to contact us in order to get an application form, this is so that we can track applicants with an interim NI RHI number until the IT system is operational. At the same time applicants will be sent a Fuel Measurement System Questionnaire (FMSQ), along with the Terms and Conditions, a Guide to Information to provide, and the declarations they must sign - although these information documents will be available on our website. All of these forms must be completed and returned to us.
- 4.5. The completed application will be manually reviewed by us, using a new manual review checklist. We will then pick up on any noted queries and points of clarification with the applicant. We will assess the application against the eligibility criteria for a final decision from Senior Management.

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Internal data entry

- 4.6. We will store all communications and documentation in a Customer Relationship Management (CRM) system, collected in an 'Accreditation Case'.
- 4.7. We will fill in the internal spreadsheet (which mirrors that seen on the GB RHI IT system currently) with interim NI RHI number, date of submission and a link to where the application is stored on CRM/ SharePoint (our internal file storage tool);
- 4.8. NI RHI participant posts bank details and ID to the Fraud and Compliance team;
- 4.9. Our Generation team conduct their level 1, 2 and 3 reviews of the application form while communicating directly with the participant in order to solve outstanding issues;
- 4.10. Once Fraud and Compliance team have confirmation that all the bank details and ID are correct they will provide a sign off sheet to the operations manager with delegated authority for approval (Lindsay Goater);
- 4.11. Our Generation team will alert Lindsay Goater that all reviews of an application have been completed and Lindsay will complete the final review and sign off. At this point Lindsay Goater will mark a password protected checkbox in the internal spreadsheet;
- 4.12. Our Generation team will regularly check the internal spreadsheet and upon seeing the signed off application, will send out an email confirming that the participant is now an accredited NI RHI user. The email will also explain that they will need the interim NI RHI reference number for all future communications and will need to use the email address stated on the application form for all electronic communications. The NI RHI user will also be informed that the NI RHI reference number is only for an interim period and they will be asked to set up an online account once the IT system is functional – expected early 2013 Periodic Data Submission
- 4.13. All NI RHI Participants are required to make a Periodic Data Submission (PDS) to us, and some Participants must also submit information about Fuels and Sustainability.
- 4.14. NI RHI participants will need to email in all their periodic data in a spreadsheet, the template can be found on our website, 3 months after their official accreditation date.
- 4.15. PDSs will be tracked on a spreadsheet to support later review and upload to the IT system when that becomes available.
- 4.16. We will then calculate payments against NI tariff levels and complete the payment cycle.
- 4.17. We confirm that an IT system will be operational by 1 February 2013, although as covered at 4.19 there is a risk that DECC's legislative amendments are delayed which could impact on this date.



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Additional Operating Cost

- 4.18. Manually operating the accreditation and periodic data collection elements of the scheme increases the operational costs (estimated at an additional £4,750 per month on top of the forecast operational costs in the Feasibility Study).
- 4.19. There is a risk that DECC's legislative amendments are delayed and changes are not made in January 2013 to the GB scheme. This would result in either additional monthly operational costs continuing until such time as the IT system can be amended in conjunction with GB changes or a standalone IT release charge being incurred to bring the NI RHI IT system online.

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5. Stakeholder Consultation

Chapter Summary

This chapter discusses the scope for stakeholder consultation, the logistics and finally the costs for delivery.

Consultation Strategy

- 5.1. DETI have confirmed that they will lead the stakeholder consultation, publish and produce materials for the workshops and will collate all evidence and feedback. This evidence will be passed on to us for analysis and to make amendments to the Guidance.
- 5.2. A four week consultation was launched by DETI from 20th September to 18th October and is on the Guidance Materials for NI RHI scheme users. Two stakeholder engagement sessions in Northern Ireland will be held during that period, the DETI run sessions were planned for the 25th and 26th September 2012 and held in Belfast and Western Northern Ireland. The engagement sessions were an open forum for stakeholders to comment on the content of the draft guidance document, ask direct policy questions to DETI with us playing a supporting role to answer specific administrative questions.
- 5.3. For the sessions we travelled to NI in the morning, attended the two sessions alongside DETI over the two days and travelled back the following evening in order to reduce resource use and costs.

Costs

- 5.4. We didn't anticipate requiring external technical consultants to assist in this stakeholder event.
- 5.5. All printing and preparatory materials were produced by DETI in-house.
- 5.6. The additional costs of supporting DETI's consultation were provided from within the Development Team Resource budget.

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6. Legal Cost Increase

Chapter Summary

This chapter sets out the justification for the increase in proposed legal costs.

Feasibility Stage Costs

- 6.1. During the development of the Feasibility Study there were still some considerable uncertainties which are set out in the 3 scenarios of legal involvement. The contingency levels of 200% for each scenario reflected the level of uncertainty and risk associated with that forecast of £62,000.

Current Legal Cost Projection

- 6.2. We have now seen a near final version of the regulations and a detailed project plan has been developed which sets out the scope of legal involvement.
- 6.3. Our legal senior management have worked up the current cost projections for the legal resource required to deliver the NI RHI.
- 6.4. The costs have increased by just over 8% to £67,000 due to factors including two full legal reviews of the guidance materials development and time spent to date on the NI regulations development in association with DETI.
- 6.5. An exacerbating factor for legal costs is that the NI RHI project team's allocated legal resource is sourced externally at a higher unit cost than our internal legal staff. This is an unavoidable consequence of workload and changing project timescales.

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7. Revised IT Amendments and Costs

Chapter Summary

This chapter sets out the justification for the increase in proposed legal costs.

IT System Amendments

- 7.1. The original cost forecast in the Feasibility Study was based on NI RHI amendments to the IT system being made at the same time as GB RHI changes to reduce costs. In order to remain in line with the Feasibility Study costs we must avoid making standalone changes to the IT system for the NI RHI.
- 7.2. We have had to delay the release of the IT system changes so that they can be combined with changes that are being made to the GB RHI scheme to introduce air quality and sustainability requirements (these are currently planned for January 2013).
- 7.3. This allows us to avoid the significant additional costs of a separate IT release – around an extra £35,000. To do so however means that we will need to operate manual accreditation (and data collection) processes between scheme go-live and the IT release.

Feasibility Study Costs

- 7.4. The costs stated in the Feasibility Study for IT development amounted to £143,000 plus 100% contingency until the end of the Feasibility Study work, at which point it would decrease to 33% contingency to reflect greater scheme certainty. This was based on the scope denoted in the draft NI regulations in 2011.
- 7.5. The estimate was based upon an April 2012 launch of the NI RHI scheme which would have tied in with changes being made to the GB RHI online register and additional services.

Current IT Cost Projection

- 7.6. As we are delaying the amendments to the RHI IT system until changes can be made in conjunction with the GB scheme, we have been able to remain in line with the forecast cost in the Feasibility Study of £143,000. As there is now more certainty regarding the detailed requirements of the NI RHI scheme, the contingency necessary has reduced from 100% to 33%. However this is entirely dependent upon there being no change in the scope of the detailed requirements compared to what we currently understand is required.
- 7.7. A detailed breakdown of the IT development requirements can be seen in Appendix 1.

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8. Proposed Budget

Chapter Summary

This chapter summarises and breaks down the proposed budget for development of the NI RHI scheme and the operational costs for 2012-13.

Development Costs Forecast

- 8.1. The following forecasts have been put together based on the available material and assumptions, including the draft regulations circulated 18 June 2012. This revised budget forecast is based on a 1 November 2012 launch, and includes savings and efficiencies that have been achieved through planned resource allocation.
- 8.2. Our legal costs have increased by £5,000, however we have found cost savings of £5,000 through 'piggybacking' on the independent risk assessment that is about to be carried out on the GB scheme.
- 8.3. The IT costs remain unchanged but we require from DETI the 33% contingency (£47,000) mentioned in the Feasibility Study that is appropriate for level of uncertainty and risk of the development phase.

Operational Costs Forecast

- 8.4. We have also now revised our 2012/13 operating cost forecast to take into account the part year operations, as well as taking into account our experience on the GB scheme with administration processing time.
- 8.5. As a result we have been able to revise down the base operating costs by almost £15,000, although this is offset by a need to increase operating costs due to the impacts of operating without IT until January. The net effect is a small increase of £4,340 to the 2012/13 operating costs so that total operating costs for 2012/13 are now forecast at £140,000.

Table 3: Development Costs Forecast

Delivery Component	Cost (£)
New Scheme Development delivery team (including: Band C Operational Manager – recruitment process & Stakeholder engagement costs)	£96,000
Internal Ofgem legal costs	£67,000
IT delivery costs	£190,000

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Independent risk assessment	£5,000
Overheads	£75,000
Total:	£433,000
Operational Costs	Cost (£)
Revised 2012/13 operational costs (pre IT delay)	£121,000
Additional 2012/13 operational costs due to delay to IT launch	£19,000
Total:	£140,000
Total 2012-13 forecast costs:	£573,000

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Appendix 1 – Detailed Breakdown of Revised IT Costs

Task	Analyse		Design		Implement		Test		Infrastructure		Total
Project / Phase Setup	11	£4,664	0	£0	13	£5,512	0	£0			£10,176
Feature 2	5.55	£2,353	1	£424	1.5	£636	3	£1,272			£4,685
Feature 3	2.855	£1,211	0.5	£212	2	£848	1.05	£445			£2,716
Feature 4	5.3	£2,247	4.5	£1,908	13.5	£5,724	0	£0			£9,879
Feature 5	5.925	£2,512	4.5	£1,908	11.75	£4,982	3	£1,272			£10,674
Feature 6	0.625	£265	1	£424	2	£848	0.75	£318			£1,855
Feature 7	3.45	£1,463	5	£2,120	12.5	£5,300	2	£848			£9,731
Feature 8	4.855	£2,059	4.5	£1,908	16.5	£6,996	2.55	£1,081			£12,044
Feature 9	1.9	£806	1	£424	1	£424	2	£848			£2,502
Feature 10	8.1125	£3,440	3.25	£1,378	2.5	£1,060	0.375	£159			£6,037
Feature 11	2.725	£1,155	1.25	£530	1	£424	0	£0			£2,109
Feature 12	0.25	£106	0	£0	0	£0	0	£0			£106
Feature 13	7.31	£3,099	1.5	£636	8.75	£3,710	2.85	£1,208			£8,654
Feature 14	3.775	£1,601	0.5	£212	4.75	£2,014	0	£0			£3,827
									21.2	£8,988.80	£8,989
Testing for three cycles	0	£0	0	£0	0	£0	14.2	£6,021			£6,021
Release	6	£2,544	0	£0	16.5	£6,996	0	£0			£9,540
	69.6325	£29,524	28.5	£12,084	107.25	£45,474	31.775	£13,473	21.2	£8,989	
	20.88975	£8,857	8.55	£3,625	32.175	£13,642	9.5325	£4,042	6.36	£2,697	
		£0		£0		£0		£0			
	90.52225	£38,381	37.05	£15,709	139.425	£59,116	41.3075	£17,514	27.56	£11,685.44	
	335.86475										
	£142,406.65										

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