

**To:** Jacqueline Balian[Jacqueline.Balian@ofgem.gov.uk]  
**From:** Mark George  
**Sent:** 2013-08-15T13:38:45Z  
**Importance:** Normal  
**Subject:** RE: RHI interpretation  
**Received:** 2013-08-15T13:38:44Z

Jacqueline,

FYI - Edmund has now spoken to Alastair and answered all his queries.  
Mark

**Mark George**, Manager - RHI Operational Team, New Scheme Development, 9 Millbank, London, SW1P 3GE. Tel: 0207 901 3139. [www.ofgem.gov.uk](http://www.ofgem.gov.uk)



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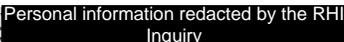
**From:** Jacqueline Balian  
**Sent:** 15 August 2013 12:40  
**To:** Mark George  
**Subject:** FW: RHI interpretation  
**Importance:** High

Mark,  
Could you have a look at this for me?  
Jacqueline

**Jacqueline Balian**  
Head of RHI Operations  
New Scheme Development  
9 Millbank  
London  
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**From:** Ali Nicol [<mailto:> ] Personal information redacted by the RHI Inquiry  
**Sent:** 15 August 2013 12:34  
**To:** Jacqueline Balian  
**Subject:** Fw: RHI interpretation  
**Importance:** High

Jacqueline

Can you help – reckon Edmund must be off on his holidays

Ali

**From:** [Ali Nicol](#)  
**Sent:** Thursday, August 15, 2013 9:53 AM  
**To:** [Edmund Ward](#)  
**Subject:** RHI interpretation

Edmund

Trust you are well ?

I seek some urgent advice on the interpretation of the RHI as applied in Northern Ireland. We work for a quasi Governmental Organisation in Northern Ireland and in one particular project they are adamant a multiple boiler solution may be used to maximise RHI benefits. This is at odds with my reading and understanding but perhaps you and or Jacqui could consider and clarify. The situation is probably best summarised by the three cases below – I've exaggerated the values to illustrate the case clearly.

The question is one of aggregation

Would you be kind enough to advise

Alastair

Case A

A hangar which requires 660kW of thermal input could either be heated with 1 x 660kW boiler qualifying for 1.5p/kWh or 7 x 99kW boilers. A Quasi Governmental department has suggested (and are adamant) that where 7 separate boilers are used each serving a separate hydraulic circuit, then each arrangement is separate and will qualify for the higher RHI support rate despite serving the **same** building.

Case B

Again a hangar requiring 1.2MW of heat input - The suggestion is made that heating this **single** building with two boilers and two separate hydraulic circuits will allow circumvention of the 1MW cap allowing the owner to claim 1.5p/kWh

Case C

Two separate hangars each with separate heating systems and each requiring 99kW of heat input, Located on the same airfield and owned by the same client The suggestion is that each of these would qualify for the highest rate RHI despite the aggregated site demand exceeding the cap for the higher rate.

Likewise 20 pellet boilers each of 99kW individually 20 small buildings on the same ex MOD site would result in a total installed size of 2MW but each could be registered and eligible for the highest rate of RHI.

Kindest regards

Alastair