

To: Marcus Porter[Marcus.Porter@ofgem.gov.uk]; Keith Avis[Keith.Avis@ofgem.gov.uk]; Lindsay Goater[Lindsay.Goater@ofgem.gov.uk]; Sophie Jubb[Sophie.Jubb@ofgem.gov.uk]
Cc: William Elliott[William.Elliott@ofgem.gov.uk]; Michelle Murdoch[Michelle.Murdoch@ofgem.gov.uk]; Paul Heigl[Paul.Heigl@ofgem.gov.uk]; Oliver More[Oliver.More@ofgem.gov.uk]
From: Marcus Porter
Sent: 2012-09-17T16:02:52Z
Importance: Normal
Subject: RE: NI RHI - "site" vs "building"
Received: 2012-09-17T16:02:53Z
[detiregsdraft2.docx](#)

All

I attach a further copy of the second draft of the DETI Regs, showing with track changes (in bold) my comments, for onward transmission to DETI please.

Marcus

From: Marcus Porter
Sent: 17 September 2012 11:35
To: Keith Avis; Lindsay Goater; Sophie Jubb
Cc: William Elliott; Michelle Murdoch; Paul Heigl
Subject: RE: NI RHI - "site" vs "building"

Fine. Thanks Keith.

Marcus

From: Keith Avis
Sent: 17 September 2012 10:59
To: Marcus Porter; Lindsay Goater; Sophie Jubb
Cc: William Elliott; Michelle Murdoch; Paul Heigl
Subject: RE: NI RHI - "site" vs "building"

Thanks Marcus.

Yes this will need to be flagged to DETI, but along with any other comments on the draft regs I suggest. So if you could let Michelle and myself have your views we can send a co-ordinated view across to Peter Hutchinson.

Keith

From: Marcus Porter
Sent: 17 September 2012 10:47
To: Lindsay Goater; Sophie Jubb; Keith Avis
Cc: William Elliott; Michelle Murdoch; Paul Heigl
Subject: RE: NI RHI - "site" vs "building"

Keith

This is potentially a complicated issue and it's not clear why DETI have made this change or (if they persist with it) what its ramifications will be, over and above the fact that it will certainly require at least some change to the draft guidance on which consultation is due to commence later this week. But, given the trouble that metering has caused the Ops team here since the GB scheme was introduced, anything that renders the concepts of "simple" and "complex" installation as used in the NI Regs any more complicated than they already are isn't likely to be received warmly by Ops – as is clear from Lindsay's email below.

I am considering the latest draft of the Regs today, including this issue. In the meantime though it seems to me that a sanitised version of Lindsay's comments needs to be passed on the DETI for them to chew over, if that hasn't already happened, not least because they have a meeting with their lawyers tomorrow.

Marcus

From: Lindsay Goater
Sent: 14 September 2012 09:40
To: Marcus Porter; Sophie Jubb; Keith Avis
Cc: William Elliott; Michelle Murdoch; Paul Heigl
Subject: RE: NI RHI - "site" vs "building"

Oh...

Definition of complex installations comes to mind, not knowing where "site" has been dropped in... Could mean what we treat as complex in GB (owing to both external pipework being considered an ineligible use, AND the fact that generation and use are not within one building) is not the same in NI...

I thought we were going for consistency with GB? This will, amongst other things, include **wording changes on IT**, and pre-empts GB saying process heat need not be in a "building"

Annotated by RHI Inquiry