

Subject: Re: Dfe [OFFICIAL]

Thanks James

Helpful point on maintenance - I've fed in.....

With most of these we are into next step of the dept will put together a list of options for each issue and we can then respond on how far we will be able to go with each option in terms of the current regs.

So not sure what we are going to cover later in terms of legal input but will let you know....

Gareth John

On 3 Nov 2016, at 14:09, James Robinson <James.Robinson@ofgem.gov.uk> wrote:

Thanks Gareth, helpful.

Agree with your thoughts.

Very quick thought on the inefficient heating systems point – can this in any way be linked to maintenance? There is an ongoing obligation for participants to “keep their accredited RHI installation maintained to the Department’s satisfaction and keep evidence of this including service and maintenance documents”: is there a way in here, or is ‘inefficiency’ not a maintenance question?

J

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-----Original Message-----

From: Gareth John

Sent: 03 November 2016 13:50

To: gareth.john@ofgem.co.uk; James Robinson

Cc: Edmund Ward; Teri Clifton; Jane Pierce

Subject: Dfe

James just giving a readout as we go along:
DfE have put a slide up with key issues and badged as
Part 1

Current enforcement possibilities key issues:

- parasitic wood drying
- inefficient heating systems
- inefficient heating systems
- inefficient use of heat (being wasteful)
- predominant domestic usage
- ineligible heat use at application stage
- 3rd party / ESCo ownership
- multiple boilers - e.g. Dfe may have A proposal to enforce a multiple boiler user to only get 1.5p kWh as if it was a single 280kw boiler instead of 3 as they could have just set up a single boiler / system / circuit.
- economic viability of heat use - GJ : risk here is how do you examine this and consider all economic aspects rather than make a judgement call .

Gareth's thoughts:

All these in effect have the following consequences:

1. What is the proposed refined interpretation and consequence to the participant
2. What enforcement action are the department expecting moving forward (but in line with the current regs) to align with their view of policy intent.
3. If that expectation is not in line with our interpretation of what is reasonable we will need to