

Non-Domestic RHI related correspondence 26/8/13 – 12/3/15:

1. When we first started selling our energy efficiency product back in 2012/2013, I spent much time going to energy/sustainability related events and out talking to potential clients. The pattern that I'd found was that an organisation who had already installed or were planning to install biomass boilers, did not seem interested in making any efficiencies/savings.
2. As a result, I started looking into the Non-Domestic RHI in NI and was amazed by the fact that it appeared to encourage wastage in contrast to the other RHI incentives in GB, which whilst encouraging uptake of the RHI also encouraged organisation to be more efficient with the tiered repayments.
3. I got so frustrated and was not sure who to raise the issue with, so I decided to email DETI and mark the correspondence FAO Arlene Foster. I used the generic (information@detini.gov.uk) email address and then after thinking that using the generic email address to DETI might mean that the message never got to Minister Foster so I took a few minutes and found Arlene Foster's public constituency email address online and wrote a similar email to this address and a further, more detailed email to this address the following week. She had kindly written back via DETI and arranged for me to go and meet with Fiona Hepper (DETI's Head of Energy Division at that time) and her Renewable Heating team.
4. The following detail tracks the correspondence. After the meeting, there were some subsequent emails from me asking for updates on progress made. The timeline is as follows:

Ref	Date	Activity	Summary
1	26/8/13 @11.17am	Email	Email to DETI To see if Arlene Foster would be free any time for us to ask some advice on how we align the energy efficiency that we deliver with the sustainability delivered by RHI (Email address used: information@detini.gov.uk)
2	26/8/13 @11.22am	Email	Email Arlene Foster at her constituency email address Stating that I wondered if Arlene would be free any time to hear about what we do and for us to ask some advice on how we align the energy efficiency that we deliver with the sustainability delivered by RHI. Adding that, given the benefits of RHI we find that many of our potential customers are no longer worried about becoming more efficient, because they are now more sustainable. I firmly believe that the two should go hand in hand and would like to be part of making that happen. (Email address used: arlene@arlenefoster.org.uk)
3	3/9/13		Follow up email to Arlene Foster at her constituency email address repeating the content of the previous email sent to this address and adding: Given the benefits of RHI we find that many of our potential customers are no longer worried about becoming more efficient, in fact it pays them to use as much as they can - in fact the incentive to use more is leading to misuse in some cases. I firmly believe that energy efficiency and sustainability should go hand and I'd really appreciate 20-30 minutes of your time to see what you think. (Email address used: arlene@arlenefoster.org.uk)
4	5/8/13	Email & letter	Email received from James Ingram (DETI Private Office) with a letter attached from Arlene Foster asking me to arrange a meeting with Fiona Hepper.
5	5/9/13 - 11/9/13	Email	Various emails liaising with Fiona Hepper's PA (Laura McCoy) to arrange a meeting
6	19/9/13	Meeting	Meeting with Steven Agnew in Stormont - following an introductory email on 12/8/13 - broadly about energy efficiency but part of which was to raise awareness of the RHI issue and ask his advice. He advised that he would question the DETI Minister on it during Minister's questions.
7	4/10/13	Email	Proposed meeting agenda Sent to Fiona Hepper's PA & passed on to Fiona Hepper and her colleagues prior to the meeting
8	8/10/13 am	Meeting	Meeting Location: FH's Office, Neterleigh, Massey Avenue Attendees: Fiona Hepper, Peter Hutchinson, Joanne McCutcheon from DETI and myself Agenda (proposed by me):

			<p>1. Overview of heatboss and its impact on the energy efficiency of commercial buildings</p> <p>2. Discussion on the impact of the RHI on energy efficiency levels</p> <p>3. Discussion on the potential opportunities to align RHI and energy efficiency measures</p> <p>4. Discussion on the potential for future incentives for energy efficiency measures in commercial and public buildings</p> <p>See notes (in attachment for Ref 8) for the main discussion points. I know this detail because I referred to these points in subsequent email to Peter Hutchinson (12/5/14), Fiona Hepper (9/6/14) and to Stephen Agnew's secretary (21/10/13).</p>
9	8/10/13 pm	Email	<p>Email received from Peter Johnston</p> <p>He attached current RHI consultation that proposed the extension of the scheme to the domestic sector and new tariffs/technologies for the non-domestic sector. I read the consultation document but domestic RHI was not relevant to me and unfortunately none of the consultation document mentioned amending the tiered repayments in line with GB. So, I didn't feel that it gave me the opportunity to add anything more than what I'd discussed already that day with the RH Team.</p> <p>In addition, he stated that we'd discussed that it might be useful for me to contact DFP as they have responsibility for energy efficiency and energy usage in the public estate. He gave me the contact details and advised me to explain that I had met with DETI and were advised that DFP might be interested to learn of a new energy efficiency product that could significantly reduce heating costs.</p>
10	21/10/16	Email	<p>Responses by DETI Minister from Steven Agnew's questions on the RHI:</p> <p>http://aims.niassembly.gov.uk/questions/printquestionssummary.aspx?docid=177011</p> <p>http://aims.niassembly.gov.uk/questions/printquestionssummary.aspx?docid=177014</p> <p>Received from Steven Agnew's PA re</p> <p>In the 2nd response the Minister advises that they promote energy efficiency first with the domestic RHI but omitted any mention of it for the Non-domestic RHI.</p>
11	12/5/14	Email	<p>Follow up email to Peter Hutchinson to re-iterate my concerns and confirm that what we were still seeing on the ground was that companies were being encouraged to waste energy to receive more RHI repayments.</p> <p>I added that we'd been told by a well-established local biomass company that it would be a good idea to remove the saving detail on our product's sales literature because their clients were no longer interested in making any savings. I told him that I'd hoped that he'd agree that there is something inherently wrong with that approach to funding.</p>

			<p>I asked if he could advise what the future plans were for the RHI tariffs for non-domestic within the coming years as we needed an awareness of this to ensure that our company can survive in Northern Ireland. I urged him to table this issue again for discussion again and advised that, if he needed proof of what's happening on the ground, I'd be happy to provide information adding that it had got to a stage now where it simply cannot be ignored any longer.</p>
12	9/6/14	Email	<p>Follow up email to Fiona Hepper (via her PA Laura) – same email as was sent to Peter Hutchinson above to re-iterate my concerns and confirm that what we were still seeing on the ground was that companies were being encouraged to waste energy to receive more RHI repayments. I added that we'd been told by a well-established local biomass company to remove the saving detail on our product's sales literature because their clients were no longer interested in making any savings. I told her that I'd hoped that she'd agree that there is something inherently wrong with that approach to funding.</p> <p>I asked if she could advise what the future plans were for the RHI tariffs for non-domestic within the coming years as we needed an awareness of this to ensure that our company can survive in Northern Ireland. I urged her to table this issue again for discussion again and advised that, if she needed proof of what's happening on the ground, I'd be happy to provide information adding that it had got to a stage now where it simply cannot be ignored any longer.</p>
13	9/6/14	Email	<p>Response from Fiona Hepper's PA to advise that Fiona and Peter had since left DETI.</p> <p>She advised that John Mills had taken over Fiona's post as Head of Energy Division and at the moment there is no replacement for Peter Hutchinson, Davina McCay is temporarily acting-up as Head of Renewable Heat Branch (in place of Joanne McCutcheon who has also left on a career break).</p>
14	11/6/14	Email	<p>Email from Davina McCay (Sustainable Energy DETI) in response to email Ref 12 to Fiona Hepper (sent 9/6/14).</p> <p>Davina stated that both Peter and Fiona have moved on to new work areas outside of DETI and Energy Division. She stated that Peter moved on in May 2014 so it's possible that my email (on 12/5/14) arrived after his departure.</p> <p>She advised that she was now looking after Renewable Heat and that she intended to review elements of the non-domestic RHI, including tariffs within the next few months. She apologised that she couldn't tell me anything more definitive than that at the moment, but that she wanted to let you know that the issues I had raised were on their radar.</p> <p>She advised that she would keep me up to date with any developments when she was in a position to do so.</p>

15	11/6/14	Email	Response to Davina McCay thanking her for responding and advising that I'd be keen to hear how things progress.
16	11/3/15	Email	<p>Email to Davina McCay Reminding her that she had advised that a review of the RHI non-domestic tariffs was to happen in the latter half of 2014.</p> <p>I reiterated that the RHI non-domestic tariff as it is currently set in NI has a huge adverse impact on us, as it means that potential clients which have moved to biomass are no longer interested in making any efficiencies. I added that I completely understood the need for the RHI and am delighted at the number of jobs that it has created within the province, but the tariffs need to include a motivation to save here, as is the case in the RHI tariffs across the water. For example, I had spoken to a company that installed a biomass boiler for a local company recently and they told me that their client would get a payback in 2 years (with the RHI payments) if he kept the heat on 24/7 Vs over 3 years if he kept the heat on the hours that it was needed (8hrs a day 5 days a week). In anyone's eyes this is completely wrong and motivates further waste.</p> <p>I added that I understood that this was only one small element of Davina's remit but that it was so important to me, not just because it impacts our business, but because of its impact on the environment – unnecessary waste of any resource should not be allowed and it should certainly not be encouraged.</p>
17	11/3/15	Email	Davina McCay forwarded my email to Seamus Hughes (DETI Energy Efficiency Branch)
18	12/3/15	Email	<p>Response from Seamus Hughes (cc'ing Stuart Wightman of DETI) in response to email to Davina McCay sent on 11/3/15</p> <p>Seamus advised that in terms of the non-domestic RHI he could advise that the phase 2 review is now underway but the final policy has yet to be determined. The phase 2 review will see the extension of the RHI to new technologies and tariffs, and these should be in place late in 2015. With regard to tiered funding, whilst this is not being proposed as a specific issue under the review it may be introduced at a later date as a budgetary control measure.</p>

19	12/3/15	Email	<p>Response to Seamus Hughes' email</p> <p>Advising him that I believe that the tiered funding in NI needs to ensure that people who avail of non-domestic RHI don't just waste fuel for the sake of earning money on the RHI repayments. I advised him that I had spoken to Fiona Hepper and her team about this 2 years ago. They'd advised me then that they didn't think that businesses would abuse the system, but we see it time and time again when out on client sites. To assume that this isn't happening is not acceptable in my view. This doesn't happen in GB as the higher rate RHI repayment only covers a certain amount (~around 75% of a 40 hr week) of their usage and the remainder of usage is at a lower rate - thus encouraging efficiencies.</p> <p>I advised him that I have been trying to speak to each person who has subsequently taken on the RHI role and Davina had acknowledged that when she was looking after Renewable Heat she intended to review elements of the non-domestic RHI, including tariffs. She had said that the issues that I was raising were on the RHI team's radar and would be dealt with. I told him that it was really disappointing to hear that that's not the case anymore, other than possibly in the future for budgetary controls. Adding that the rest of us, who are actually trying to save energy, money and the environment have an uphill struggle against such legislation. I understand that it is a renewable resource, if replanted, but really should it be being wasted for profit?</p>
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