



Paul Russell  
Senior Manager Operations  
RHI  
C/O OFGEM  
9 Millbank  
London  
SW1P 3GE

9 October 2017

Dear Sir

**Re: The Independent Public Inquiry into the Non Domestic Renewable Heat Incentive (RHI) Scheme**  
**Provision of a Section 21 Notice requiring the provision of evidence in the form of a written statement**

I am writing to you in my capacity as Solicitor to the Independent Public Inquiry into the Non Domestic Renewable Heat Incentive (RHI) Scheme (known as 'the RHI Inquiry') which has been set up under the Inquiries Act 2005 ('the Act').

I know that you will be familiar, from my previous correspondence, with the RHI Inquiry's Terms of Reference, which remain available on the Inquiry's website. You will also be aware that the RHI Inquiry is conducting its investigations into the matters set out in its Terms of Reference. The Inquiry is continuing with the process of gathering all of the relevant documentation from relevant departments, organisations and individuals.

In addition, the Inquiry is also engaged in the process of requiring individuals who have been, or who may have been, involved in the range of matters which come within the Inquiry's Terms of Reference to provide written evidence to the Inquiry Panel.

In keeping with the approach we are taking with other individuals, the RHI Inquiry is now issuing to you a Statutory Notice (known as a 'Section 21 Notice') pursuant to its powers to compel the provision of evidence in the form of a written statement in relation to the matters falling within its Terms of Reference.

The Section 21 Notice enclosed with this letter requires you to provide evidence to the RHI Inquiry Panel in the form of a written statement addressing the matters identified in the Schedule to the Section 21 Notice. As the text of the Section 21 Notice explains, you are required by law to comply with it.

The aim of the enclosed Notice is to require you to provide all relevant evidence you have within your knowledge, information or belief which is pertinent to the Inquiry's Terms of Reference. The Schedule to the enclosed Section 21 Notice provides further detail as to the matters which should be covered in the written evidence which is required from you. In the event that there is a category of information in respect of which you have no evidence which you can provide, please state this in your response. Where you can provide evidence, the more comprehensive your statement is, the less likely it may be that the Inquiry will have to revert to you at a later stage for clarification, although in many cases this is likely to be necessary to some degree.

It is vital that the witness statement you provide to the Inquiry is your own evidence, absent the influence of others; that it is comprehensive; and that it fully explains your involvement in the matters about which you have been asked.

As you may be aware, the Inquiry has already required the provision of a statement setting out the corporate position of Ofgem in relation to the Northern Ireland RHI Scheme. However, the Inquiry Panel is also interested in the roles played by individual officials from Ofgem who were involved with the Scheme. Moreover, the Inquiry Panel recognise that individual officials may have a different perspective from, or may even disagree with certain aspects of, the position adopted by the organisation they work for. The statement, which is required from you pursuant to

the enclosed Notice, is your opportunity to explain what you did in relation to the Northern Ireland RHI Scheme and why you did it; and also to make the Inquiry aware of any concerns you may have about the actions of others.

I appreciate that you may require or desire access to some documentation in order to assist you in preparing your statement. In particular, you may wish to see documentation to which you previously had access but now no longer have access in your current post. If that applies in your case, I understand that Ofgem will assist you, at least in the first instance. You should contact Mark Mills, Principal Legal Advisor at Ofgem. He is contactable at [Mark.Mills@ofgem.gov.uk](mailto:Mark.Mills@ofgem.gov.uk). I have informed Mark Mills that you may be making contact with him to arrange access to documentation, or for general assistance and support; but there is, of course, no obligation upon you to do so. If you encounter any difficulties, of whatever kind, you should not hesitate to get in touch with me.

I also refer you to Restriction Order No 2 made by the Chairman of the RHI Inquiry on 22 June 2017, a copy of which is enclosed for your convenience. This restriction order prohibits you from publishing any documentation received from the RHI Inquiry (save that you may show it to your legal representative) unless you first obtain the consent in writing of the Inquiry Chairman.

In addition to the four restriction orders made by the Chairman of the RHI Inquiry (which you will find published on the Inquiry website) receipt of this correspondence and its enclosures also places you under a duty of confidentiality to the RHI Inquiry in respect of them. You may share the correspondence and the enclosed Notice and documents with your legal representative(s), but neither you nor they may show, communicate the contents of, nor provide this correspondence or the Notice or documents to any other person or organisation without the express permission of the RHI Inquiry. Any breach of this duty of confidentiality is actionable at the suit of the Inquiry Chairman.

You will also find attached to the Section 21 Notice a Guidance Note explaining the nature of a Section 21 Notice and the procedures that the RHI Inquiry has adopted in relation to such a notice. In particular, you are asked to provide your evidence in

the form of the template witness statement which is also enclosed with this correspondence.

Given the tight time-frame within which the RHI Inquiry must operate, the Chairman of the Inquiry would be grateful if you would comply with the requirements of the Section 21 Notice as soon as possible and, in any event, by the date set out for compliance in the Notice itself.

Finally, I would be grateful if you could acknowledge receipt of this correspondence and the enclosed notice by email to [Patrick.Butler@rhiinquiry.org](mailto:Patrick.Butler@rhiinquiry.org).

Please do not hesitate to contact me to discuss any matter arising.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Patrick Butler', with a stylized flourish at the end.

**Patrick Butler**

Solicitor to the RHI Inquiry

02890408928

**SCHEDULE****[No 503 of 2017]***Background*

1. Set out a description of your occupational history, qualifications and experience.
2. Set out a summary of your role or roles within Ofgem. Please provide details of dates between which you held the role/s, and what the role/s entailed. In each instance, describe how this role related, if at all, to the Non Domestic Renewable Heat Incentive (RHI) Scheme in Northern Ireland ('the NI RHI Scheme').
3. Explain, insofar as is relevant to any involvement you had with the RHI Scheme, to whom you were accountable and/or reported in Ofgem and who, if anyone, was accountable and/or reported to you.

*Involvement with Northern Ireland RHI Scheme*

4. Please summarise any involvement you had with the NI RHI Scheme, whether in respect of its creation, operation, administration, or otherwise, and during what period you were so involved.
5. In respect of your particular role or position:
  - a. Explain what proportion or percentage of your role was devoted to work on the NI RHI Scheme (giving details, if applicable, of how this altered over time or at different periods);
  - b. Explain how you carried out your roles or responsibilities in relation to the NI RHI Scheme on a day-to-day basis; and
  - c. Specify whether you consider you were adequately trained and/or resourced in respect of your roles or responsibilities in relation to the NI

RHI Scheme. (If not, please specify clearly in what respects you contend this was not so and, if applicable, what steps you took in relation to this).

6. Identify, in your view, any actual or potential problems, flaws, anomalies, or difficulties with the NI RHI Scheme and/or its operation or administration, explaining in each instance, so far as you can, how those problems, flaws, anomalies, or difficulties manifested themselves, how they came about, and with whom (if anyone) responsibility or accountability for them lay.
7. Please identify when, and how, you first became aware of each of the aforementioned problems, flaws, etc..
8. Please identify and explain any difficulties you encountered within Ofgem in respect of the operation of the administration of the RHI Scheme.
9. Please identify and explain any difficulties you encountered in the relationship between Ofgem and the Department of Enterprise, Trade and Investment (DETI) (later, the Department for the Economy) in Northern Ireland in respect of the operation of the administration of the NI RHI Scheme.

*Involvement with Great Britain RHI Scheme*

10. If you had any involvement in the Northern Ireland RHI Scheme (as addressed above), please also address the following issues:
  - a. State whether you were also involved in the analogous RHI Scheme which operated in Great Britain ('the GB RHI Scheme');
  - b. If you were involved in the GB RHI Scheme, summarise briefly the extent and nature of your involvement in it;
  - c. If you were involved in both RHI Schemes:

- i. state whether, based upon your experience of each, there were lessons to be learned for the NI RHI Scheme from the GB RHI Scheme and, if there were, clarify what those lessons were, whether they were learned, and, if they were not learned, what you understand to be the reasons for this;
- ii. state whether, based upon your experiences of each, there were differences in how Ofgem dealt with each Scheme and if there were such differences, clarify whether any of them impacted adversely upon the NI RHI Scheme (in particular, concerning the proper administration of that Scheme), clarify what those particular differences were, and set out the reasons for those differences as you understand them.

#### *Promotion of the NI RHI Scheme*

11. Specify whether you promoted the NI RHI Scheme and/or encouraged any third party to seek accreditation under the Scheme, assisted any third party in so doing, or provided any third party with information knowing that they might apply, or consider applying, or that they might advise, encourage, assist, or cause other persons to apply, or consider applying, for accreditation under the Scheme. In respect of any such instance, please provide full details including (but not limited to) the third party concerned and the date of any steps taken by you in that regard.

#### *Lobbying and pressure*

12. Identify any instances, to your knowledge or belief, of lobbying or encouragement of Ministers, Special Advisers, Civil Servants or other relevant persons in relation to the terms of the NI RHI Scheme and/or the introduction, non-introduction, variation or delay of the introduction of cost controls into the Scheme (including, but not limited to, the amendment of tariffs, tiering, degression and Scheme suspension or closure) at any stage but, in particular, at the creation of the Scheme and in the period from mid-2015 to early 2016.

13. Identify any instances, to your knowledge or belief, where influence or pressure was exerted on you in relation to any aspect of the NI RHI Scheme. In respect of any such instance specify:
- a. who provided that influence or pressure;
  - b. when it occurred;
  - c. what it consisted of and how it was conveyed;
  - d. what you believed the motivation to have been (and what you now believe the motivation to have been, if different), and why you believe that; and
  - e. how you dealt with it.
14. Identify any instances, to your knowledge or belief, where influence or pressure was exerted on someone else in relation to the NI RHI Scheme. In respect of any such instance identify:
- a. who provided that influence or pressure;
  - b. who it was exerted on;
  - c. when it occurred;
  - d. what it consisted of and how it was conveyed;
  - e. what you believe the motivation to have been, and why you believe that;
  - f. how it was dealt with; and
  - g. how and when you came to be aware of the influence or pressure.

*Standards of conduct and conflict of interest*

15. Identify any instances, to your knowledge or belief, where a Minister, Special Adviser, Civil Servant or any other person involved in the NI RHI Scheme (including, if applicable, yourself):
- a. breached relevant standards (including, but not limited to, the Nolan Principles, the Ministerial Code of Conduct, the Civil Service Code of Conduct, the Code of Conduct for Special Advisers and/or terms or



conditions of employment or service) or acted in a way incompatible with their duties (including, but not limited to, by means of making premature or unauthorised disclosures);

- b. acted in circumstances relating to or touching upon the Scheme in any way where they had a real or perceived conflict of interest;

in respect of any such instances, providing details and specifying the basis for any belief that there has been a breach of a relevant standard or duty or that a conflict of interest arose.

- 16. Specify whether, to your knowledge, you have any connection to a person or body receiving payment under the NI RHI Scheme or benefiting commercially from the Scheme in some other way (for instance, by supplying equipment, plant, fuel or other goods or services used by Scheme claimants). In this request, a 'connection' includes (but is not limited to) circumstances where the Scheme claimant or beneficiary is a relative, friend, close acquaintance, business associate or (in the case of politicians or special advisers) donor or supporter (either to or of you or your political party).

#### *Whistle-blowing and raising of concerns*

- 17. Identify any instances of which you are aware of whistle-blowing in relation to the Scheme, or disclosures made in the public interest raising concerns about the NI RHI Scheme, setting out details of when this occurred, to whom and by whom any relevant disclosure was made and how it was dealt with.
- 18. In particular, provide an account of how you dealt with any disclosures raising concerns about the NI RHI Scheme made or communicated to you at any time. In relation to each such instance, identify precisely how the concerns were communicated to you.
- 19. Specify when you first became aware that subsidies payable under the NI RHI Scheme exceeded the cost of biomass fuel used to produce heat (so that there

was an incentive in some cases to produce heat merely to make profit from the Scheme) and how you so became aware.

*General*

20. Considering the RHI Inquiry's Terms of Reference, please identify any representations made to you about the RHI Scheme (which you regard as significant and about which you consider the RHI Inquiry should be aware), whether those representations were made by colleagues, or otherwise. In respect of any such representations please indicate when they occurred, where they occurred, who was involved, and what was said or communicated to you.
21. Considering the RHI Inquiry's Terms of Reference, please identify any conversations or discussions you had about the RHI Scheme (which you regard as significant and about which you consider the RHI Inquiry should be aware), whether those conversations or discussions involved colleagues, or otherwise. In respect of any such conversations or discussions please indicate when they occurred, where they occurred, who was involved, and what was said to you.
22. Provide any further evidence within your knowledge or belief which is relevant to the matters which the RHI Inquiry is investigating as set out in the RHI Inquiry's Terms of Reference.

**NOTE:**

It is important for the efficiency of the RHI Inquiry that the issues identified above are addressed as fully as possible and by reference, where available, to the dates and locations of specific incidents to which reference is made. The statement should be broken down into paragraphs, which should be numbered sequentially from '1' to the end. The use of appropriate section headings or sub-headings is also encouraged. A template witness statement is provided with this Notice for your assistance and should be used as the format for your response.



**INQUIRY INTO THE RENEWABLE HEAT INCENTIVE SCHEME**

**RHI REF: Notice 503 of 2017**

**DATE:**

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**Witness Statement of: Paul Russell**

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I, Paul Russell, will say as follows: -

*Background*

1. My occupational history is as follows:
  - a. Head of Operational Delivery ND RHI – Ofgem: August 2017 to present.
  - b. Senior Operations Manager – Ofgem: July 2016 to August 2017.
    - i. *Applications Team position: November 16 to August 17.*
    - ii. *Customer Service Team position: July 16 to November 16.*
  - c. Operations Manager – Ofgem: November 2014 to July 2016.
  - d. Assistant Manager – Ofgem: January 2014 to November 2014.
  - e. Customer Service Advisor – Scottish Power Prepayment: September 2013 to January 2014.
  - f. Customer Service Advisor – Student Loans Company: June 2011 to November 2011, June 2012 to October 2012, May 2013 to September 2013.
  - g. Building Contractor: January 2005 – May 2011

My qualifications are as follows:

- MA (Hons) in Politics – Upper Second Class from Glasgow University: October 2001 to December 2004, October 2011 to May 2013
- Prior to starting University in 2001, I completed 6 years of High School and held a number of part time jobs.

2. My roles at Ofgem are detailed below:



***Head of Operational Delivery – GB & NI Non Domestic RHI: August 2017 to present***

Key Responsibilities:

- Lead, manage and develop a team of cross-site staff.
- Delegated authority to take decisions in relation to the administration of the GB & NI RHI schemes (such as accrediting generators and approving payments as appropriate).
- Line management responsibilities, supporting the personal development of staff.
- Support leadership team on key corporate projects.
- Manage team performance and meet operational key performance indicators
- Represent Ofgem at meetings with industry, government and consumers as needed
- Manage relationships with key internal and external stakeholders
- Assist development and testing of communications and review processes and procedures to improve performance and efficiencies; both on the GB & NI RHI schemes.
- Play a key role in the leadership team.

**Senior Operations Manager – GB & NI Non Domestic RHI: Applications Team from November 2016 to August 2016 and GB & NI Customer Service Team from July 2016 to November 2016**

Key Responsibilities:

- Applications - Management and strategic leadership of a team of over twenty staff who assess technically complex applications and sustainability information for accreditation; both on the GB & NI RHI schemes.
- Customer Service - Management and strategic leadership of a customer facing team of c.15 staff who provide support to applicants/participants of the scheme by phone and email, carry out ID/Bank verification of applicants/participants details and deal with any scheme complaints/disputes; both on the GB & NI RHI schemes.
- Carry out forecasting of volumes and trend analysis in relation to resourcing and for reporting.
- Day to day line management of reports.
- Delegated authority (DA) for both the GB & NI RHI schemes - undertaking governance assurance checks for QA for Periodic Data, Account changes, Functional Amendments and multiple technologies at Applications stage.
- Represent the scheme and the business regularly at stakeholder events both in terms of delivering presentations and answering QAs.
- Work as an active member of the scheme leadership team in terms of delivering key messaging, project work, and supplying management information.



- Responsibility for risk and issue identification, mitigation and fraud prevention by identifying risks.

### **Periodic Data Operations Manager – GB & NI Non Domestic RHI: November 2014 to July 2016**

#### Key Responsibilities:

- Management of a team of c. ten staff who analyse and process data submissions to ensure correct calculations for payment; both on the GB and NI RHI schemes.
- Quality Assurance through Delegated Authority with responsibility for checking and signing off submissions to be paid; both on the GB and NI RHI schemes
- Analysis of submission volumes, forecasting of future work volumes / submission trends and team outputs to feed into reporting.
- Handled escalations for my own team, the Enquiries team relating to Periodic Data.
- Subject matter expert in Periodic Data and the Periodic Data IT system.
- Responsible for planning and overseeing training for new staff for the team.

### **Assistant Manager – GB Non Domestic RHI only: January 2014 – November 2014**

#### Key Responsibilities:

- Assess applications for accreditation to the GB scheme against the scheme eligibility criteria and regulations within set timescales to deliver KPIs.
- Answer complex queries from applicants/participants on eligibility and technical requirements.
- Liaise with internal teams in relation to shared application work to ensure that risks of any non-compliance were minimised.
- Supported line manager by taking ownership of challenging and complaint cases, to resolve them in a timely manner.

#### 3. Involvement with the NI RHI scheme as per below:

- a. Head of Operational Delivery: Report to Gareth John – Associate Director for GB & NI ND RHI schemes.
  - i. Reportees: 2 Senior Managers and 6 Ops Managers over the period.
- b. Senior Operations Manager: Reported to Teri Clifton – Head of Operations for GB & NI ND RHI schemes.
  - i. Reportees: 6 Operations Managers over the period.
- c. Operations Manager: Reported to Lewis Martin – Senior Operations Manager for GB & NI ND RHI schemes.



- i. Reportees: Up to 10 Assistant Managers over the period I was in post.

*Involvement with Northern Ireland RHI Scheme*

4. I have had involvement with the administration of the NI RHI scheme in the roles detailed above in 3. In section 2 I have given a thorough break down of the tasks under taken in these roles and the time periods. The roles that are relevant to the NI RHI scheme are the Periodic Data Operations Manager & Senior Manager for Customer Service & Accreditations and Head of Operations role. I was working on NI RHI scheme in various administrative functions as detailed above and making Delegated Authority decisions on periodic data submissions and applications eligibility.
  
5.
  - a.
    - i. For the Periodic Data role estimating time commitment; I would say c.15 % of my time.
    - ii. For the Senior Managers Role for Customer Service estimating time commitment; I would say c.10 % of my time.
    - iii. For the Senior Managers Role for Applications and current role, I would estimate between 20 - 25 % of my time.
  - b. A full break down of my roles is supplied above at 2. However, out of the tasks above, the main focus for each is
    - i. For the Periodic Data role I spent as much time as was required to check and approve submissions reviewed by the team at Delegated Authority, to ensure our KPIs were maintained; the submission volumes vary from month to month. Additionally, I checked and approved all late data estimates for the NI RHI scheme, prior to the participant being able to submit data for the relevant periods. Additionally, I discussed cases with the team and gave steer on approach and correspondence with applicants. Furthermore, I checked and approved any under or overpayment calculations as required, for installations on the NI scheme.



- ii. For the Senior Managers Role for Customer Service, I mostly was involved with Delegated Authority checks and approvals for Account Change and Functional Amendments made to installations who were already on the NI scheme and were making changes. I also attended board meetings with DFE as required.
    - iii. For the Senior Managers Role for Applications and current role. My involvement has centred round the QA and Delegated Authority of applications for approval and rejection; for the NI RHI scheme. I have spent time assessing the eligibility of applications for Accreditation in isolation and with other Senior Management colleagues as required. I have given the team steers as required on eligibility checks and content for further information requests when dealing with cases. I have also engaged with external stakeholders on a regular basis mainly with regards to discussing requests for further information and the evidence requirements to prove eligibility. Additionally, I have spent undertaking formal reviews as required. Finally, I have attended board meetings with DFE and other meetings with the task force as required.
  - c. In terms of my roles detailed above I feel that adequate training was given and support was given as requested. Additionally, I feel that I was adequately resourced with regards to my roles in relation to the NI scheme.
6. Based on my experience of my role as Operations Manager for the Periodic Data team when the scheme was open, I did not face any difficulties administering the scheme within this team. With regards to problems or anomalies, I did not face any of these circumstances in this role and I oversaw the processing of submission as per the stand operating procedure effectively. Post scheme closure, I have continued to progress the case work for the NI RHI scheme as per the SOP and as per above did not face any difficulties or anomalies.



7. I am unable to provide a response to this question based on my answer above at 6.
  
8. With regards to the Operation of the scheme in my role as Operations Manager of the Periodic Data team; I have no incite that I can offer with regards to any difficulties with the administration of the scheme. Operationally, we process the data submissions as required to meet the required key performance indicators; as per the SOP. Additionally, in my Senior Manager for Customer Service role, I didn't face any difficulty and had relatively low interaction with the NI scheme at this time. In my Senior Manager for Applications role and current role; the only difficulty that I faced was in regards to the timescales which some applicants took to respond to requests for further information for their applications; to allow me to complete the assessment of the outstanding application in the portfolio in as timely a manner in 2017 as I would have liked. However, I used the NI Regulations where possible to reject any applications that could not provide the information required in a timely manner.
  
9. My exposure to direct contact with DETI/DFE has been limited to project boards after the scheme closed, from the point where I took up my Senior Managers role and I attend one task force meeting in 2017. Prior to this point I did not deal with DFE/DETI directly so do not have any experience of whether there were any difficulties in the working relationship between Ofgem and DETI/DFE; so cannot comment further on this question.

#### *Involvement with Great Britain RHI Scheme*

10.
  - a. I have been involved in the GB scheme throughout at my time at Ofgem, in all of my roles.
  
  - b. My roles are detailed above in section 2. However, I have given a further synopsis below. In my original role as an Assistant Manager I was responsible for assessing the eligibility of applications for the GB





scheme, dealing with participants on the scheme in relation to their applications and recommending applications for approval. In my role as the Periodic Data Operations Manager I was involved in the management of the team who reviewed and processed the Periodic Data submissions for the GB scheme. In my Senior Operations role I was responsible for the strategic operation of the teams under my control on the GB scheme; firstly the Verifications, Enquiries and Complaints & Disputes team, then I moved on to oversee the work of the Applications team. Since August I have taken on the post of Head of Operational Delivery for Accreditations, Amendments and Periodic Data with responsibility for oversight and ensuring the delivery in these areas for the GB scheme; including working closely with BEIS.

- c.
- i. In terms of my own experience in the role that I was involved in while the scheme was open, there were not lessons to be learnt from the GB scheme given the different Regulations in force at the time for the GB and NI schemes; which is what I worked to for each scheme. I believe that lessons can be learnt in hindsight but operationally we ensured compliance to each schemes Regulations as is our role at the time.
  - ii. From my perspective in terms of operational approach the schemes ran in parallel and were treated both properly and comparatively from my perspective. In terms of split for the GB and NI schemes; I believe they were reviewed and quality checked in the same manner re their SOPs for each schemes Regulations and given the same attention by the Operational Teams. The SLAs for payment etc. were all the same and adhered to.

### *Promotion of the NI RHI Scheme*



11. I have neither promoted the NI scheme or either encouraged/assisted any third party to apply for the scheme.

*Lobbying and pressure*

12. I have no knowledge of the circumstances detailed in section 12, so I am unable to comment.
13. I have no knowledge of the circumstances detailed in section 13, so I am unable to comment on parts 13 a – e.
14. I have no knowledge of the circumstances detailed in section 14, so I am unable to comment on parts 14 a – g.
15. I have no knowledge of the circumstances detailed in section 15 a or b; so I am unable to comment.

*Standards of conduct and conflict of interest*

16. I have no knowledge of any connections relating to the circumstances detailed in section 16, so I am unable to comment.

*Whistle-blowing and raising of concern*

17. I have been involved in the discussion of cases on the Northern Ireland scheme where there has been instances of whistle blowing. These whistle blowing allegations were made via Ofgem's anonymous whistle blowing Service. This service is managed through another team in Ofgem environmental schemes central delivery unit. My involvement has only been with regards to providing input at case consultations, re the Accreditation cases specifics. I do not see the specific allegations received, I only provide Operational advice/make decisions on the eligibility of installations with regards to any allegation; at the request of colleagues. I have only input on a number of occasions in 2017, when requested by the relevant team with Ofgem. Due to the circumstances detailed above, then is not possible for me to provide the times of occurrence, to whom and by whom disclosures were made and a conclusive description of how it was dealt with.



18. No disclosures have been made to me personally, so I am unable to comment in this regard.
19. I first became aware that the subsidies payable under the NI RHI Scheme exceeded the cost of the biomass fuel used to produce heat via the extensive national media coverage in 2016, post scheme closure.

*General*

20. No representations have been made to me that I consider significant re the TOR of the Inquiry.
21. I have not had conversations or discussions that would be significant re the TOR of the Inquiry.
22. I do not have any further relevant evidence within my knowledge or belief to disclose re the TOR of the Inquiry.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:

Dated: 22.10.2017