

Jeff Partridge
Finance Management Branch
Finance Division
Department for Economy
Adelaide House
Adelaide Street
Belfast
BT2 8FD

By post and email Jeff.Partridge@economy.ni.gov.uk

9 August 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 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 respective corporate positions of both the Department for the Economy and the Department of Finance in relation to the RHI Scheme. However, the Inquiry Panel is also interested in the roles played by individual civil servants 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 their Department (or former Department). The statement which is required from you pursuant to the enclosed Notice is your opportunity to explain what you did in relation to the 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 the Department for the Economy (DfE) is making arrangements to permit such access, at least in the first instance. You should contact Terence Coyne at DfE, who is the Department's RHI Task Force Information Manager, to organise this. He is contactable at Terence.Coyne@economy-ni.gov.uk. I have informed Mr Coyne that you may be making contact with him to arrange access to documentation; but there is, of course, no obligation upon you to do so.

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 three 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.

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 long, sweeping horizontal stroke extending to the right.

Patrick Butler

Solicitor to the RHI Inquiry

02890408928

SCHEDULE**[No 388 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 the Department for Economy (previously the Department of Enterprise, Trade and Investment) ('the Department'). Please provide details of dates between which you held the role/s; when, how and why you were appointed to 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 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 the Department and who, if anyone, was accountable to and/or reported to you (and during what periods).

Finance Division within DETI/DfE

4. Please explain the nature of Finance Division (and the Branches within it) and how it fits into the overall operation of the Department. If this changed during your time in your role in Finance Division then please set out when the changes occurred and what they were.
5. Please explain the structures that operated in Finance Division and the general method of working within the Division. Please include an explanation of the accountability mechanisms within the Division.
6. Please explain the mechanisms in place for interaction between Finance Division and others, including:

- a. with the Department for Finance and Personnel (later, the Department of Finance); and
 - b. how, in turn, Finance Division would consequently interact with your own Departmental Divisions arising from interaction with the Department for Finance and Personnel/Department of Finance;
 - c. with Her Majesty's Treasury; and
 - d. how in turn Finance Division consequently interacted with the Department for Finance and Personnel/Department of Finance, and with your own Departmental Divisions arising from interaction with Her Majesty's Treasury.
7. Explain the structures that operated between Finance Division and Departmental Divisions such as Energy Division.
 8. Explain the nature of finance documentation required within the Department. (For instance: were there finance reports and/or monitoring returns? How often were they required? What were they expected to cover? *Et cetera*).

Finance Branch

9. Explain the purpose and functions of Finance Branch (within Finance Division).
10. Please set out anything else about the operation of Finance Branch (or Finance Division) of which you consider the RHI Inquiry should be aware.

General involvement with the RHI Scheme

11. Please summarise what involvement you had with the RHI Scheme, and during what period.

12. In respect of your particular role or position:
 - a. Explain what proportion or percentage of your role was devoted to work on the RHI Scheme (giving details, if applicable, of how this altered over time or at different periods);
 - b. Explain how you would have carried out your roles or responsibilities in relation to the RHI Scheme on a day-to-day basis;
 - c. Explain who you would have interacted with over the RHI Scheme, and in what regard; and
 - d. Specify whether you consider you were adequately trained and/or resourced in respect of your roles or responsibilities in relation to the 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).
13. Explain in detail any involvement you had in relation to, or touching upon, the RHI Scheme including (but not limited to) any role or involvement you had in respect of the setting up, design, implementation, operation, promotion, oversight, governance, funding, amendment (including the introduction of cost controls), suspension and/or closure of the Scheme, from its inception up to the present day.
14. Without prejudice to the generality of paragraph 13 above, explain your involvement (if any) in:
 - a. the creation and development of the Scheme in, or before, 2012;
 - b. the administration/operation of the Scheme;

- c. any problems or difficulties which emerged in respect of the Scheme (including, but not limited to, the causing or permitting, identification, consideration and/or remediation of any such problems);
- d. the amendment, suspension or closure of the Scheme;

in each instance providing:

- i. details of any relevant interactions with Civil Servants, Ministers, Special Advisers, MLAs, politicians, political parties and other potentially relevant persons (e.g. consultants, the renewable heating industry, actual or potential applicants for accreditation under the Scheme, journalists, etc.);
 - ii. where you made any decision, or gave any advice, in respect of any of the matters set out at paragraph 13 above, the reasons for that decision or that advice (as the case may be); and
 - iii. details of any documents which are of significance or particular relevance (which should be annexed to the witness statement if you have access to the documentation which permits you to do so; or, otherwise, which is identified as clearly as you can).
15. Please explain when you were first involved with the RHI Scheme, and what that involvement was.
16. Please identify when you first became aware that there was a problem or problems with the RHI Scheme and explain what they were.
17. Explain your understanding of the funding arrangements for the Scheme, including how that understanding was gained; how (if at all) it developed; what steps (if any) you took or directed to clarify the funding arrangements for the Scheme; whether, if you misunderstood the funding arrangements for the Scheme at any material time, you consequently communicated an inaccurate

description of the Scheme's funding to other persons (in particular, more junior officials) at any material time (identifying the approximate date and recipient of such communications) and, if applicable, the steps you took to correct any misunderstanding on the part of other persons regarding the funding arrangements for the Scheme (identifying the approximate date of each such step and the name of each relevant person).

18. Identify, in your view, any flaws or difficulties with the Scheme and/or its operation, explaining in each instance, so far as you can, how these difficulties or flaws came about, when they first came to light (if they should have come to light sooner when that should have been and why) and with whom (if anyone) responsibility or accountability for them lay.

The RHI Scheme and AME and DEL – 2011 emails

19. Please provide a summary explanation of your understanding of the term 'DEL' and your understanding of the term 'AME'. In doing so, please also set out the differences between DEL and AME, and the differences in how they are treated within departmental finances.
20. From information received by the Inquiry, it appears that, on 15 April 2011, Alison Clydesdale forwarded to Bernie Brankin an email which she had received from Jon Parker in Her Majesty's Treasury (HMT). The email can be found at WIT-00842 to WIT-00843 in the Inquiry's evidence bundle and a copy is provided herewith. The forwarded email from Jon Parker included the following passage:

"The other key point it is necessary to let you know about is that DECC RHI spending is not being treated as standard AME, where the Exchequer takes on all risks of overspend. Instead, there is a risk-sharing arrangement whereby should RHI spending in one year exceed the SR profile, then DECC would need to repay this in future years. They can do this through announcing changes to the SR that will bring cost savings relative to the SR profile in future years. However, a small

proportion of any required future savings (still to be determined, but likely to be of the order of 5%) will have to be funded through contributions from DECCs DEL. Again, these rules should be applied in equivalent fashion to NI. ”

It further appears that, on 3 May 2011, Bernie Brankin sent an email to Alison Clydesdale (at WIT-00840 to WIT-00841) about the nature of the funding available for the RHI Scheme. Bernie Brankin’s email included the following passage:

“Energy Division’s AME has now been confirmed. I have spoken to Stuart Stevenson regarding [NI Scheme] AME allocation. [NI Scheme] spending is not being treated as standard AME. This means that your [NI Scheme] budget allocation is being treated the same as DEL allocations ... if you overspend in any year, [the Department’s] budget will be reduced by the amount of overspend in future years.”

As to these communications, please address the following:

- a. What role, if any, had you in respect of this issue, and what input, if any, had you to Bernie Brankin’s email?
- b. Had you come across non-standard AME (or AME with a potential DEL effect) before? If so, when, and in what circumstances?
- c. How significant was it to be told that the funding was not standard AME?
- d. What did this mean to you in terms of how the RHI Scheme would have to be set up, dealt with and managed?
- e. Did you bring the fact that the funding for the RHI Scheme was not standard AME to the attention of your superiors? If you did, why did you do this? If you did, what (if anything) to your knowledge did they do about it? If you did not, why did you not do that?

- f. What steps could have been taken within Finance Division to highlight, and keep highlighted, the fact that funding for the RHI Scheme was not standard AME?
 - g. To your knowledge, what steps were actually taken within Finance Division to highlight, and keep highlighted, the fact that funding for the RHI Scheme was not standard AME?
 - h. What steps do you say Energy Division should have taken on foot of Bernie Brankin's email, and why do you say they should have taken any such steps?
21. If this type of "non-standard AME" (or AME with potential DEL effect) was unusual; not properly understood; and/or potentially posed greater risks for the Department; what was done to deal with those facts, and by who, and, if different, what should have been done, why, and by who?
22. In relation to your understanding of the May 2011 funding position, please explain your understanding of:
- a. How the 5% would work;
 - b. What it was of which 5% would be subject to penalty;
 - c. From what resource any 5% penalty would come;
 - d. If the 5% penalty had to come from over and above any RHI budget, how this would be managed by DETI; and
 - e. Whether any 5% penalty levied could be recouped in some way, and from what.
23. In relation to the potential for a penalty to accrue against DETI's DEL budget, how was this fact recorded in DETI Finance Division records?
24. Was the fact of this type of funding arrangement (AME but with a potential DEL consequence) something that should have been brought to the attention

of the Permanent Secretary of the Department? If so, please explain the basis for so saying.

25. If there were no “non-standard AME” (or AME with a potential DEL effect) budget lines within Departmental finance computer systems and reports, then please explain why this was so. If there should have been please explain why this was not the case.
26. What measures were in place to ensure that “non-standard AME” (or AME with a potential DEL effect) was flagged and any risk associated with it properly managed within the Department? If there were other steps you consider should have been taken, please explain what these were and why you consider they should have been taken.
27. Were quarterly monitoring returns in respect of, or including, the RHI Scheme headed “AME”? If so why was this the case if in fact the RHI funding was “non-standard AME”.
28. Who was responsible for titling monitoring returns? Was it possible to title them differently? If so, why was this not done, to reflect the actual type of funding involved?

Previous experience of similar schemes

29. What previous experience (if any) had you of dealing with schemes that were similar in principle to the RHI Scheme? Please describe any previous similar schemes.
30. Of what previous experience of similar schemes are you aware which DETI Energy Division had when it embarked on the RHI Scheme?
31. If you were involved with, or gleaned learning from, the “Reconnect” Scheme then please describe that scheme and set out what the problems were, when

they occurred, what was done to deal with them, and what learning came from that Scheme.

32. What warnings in respect of the RHI Scheme, if any, arising from your previous experience, did you give; to whom did you give any warning; and when did you give it?

2011 to March 2015

33. For the period between 2011 and March 2015 please set out in what way you were engaged with or carried out work relating to the RHI Scheme.
34. When did you first become aware that there was any problem with the RHI Scheme? In relation to that:
- a. How did you become so aware?
 - b. Who informed you?
 - c. What were you told as to the problem at that point in time?

Emails of 26 March 2015, 19 May 2015 and 20 May 2015

35. From information received by the Inquiry, it appears that, on 26 March 2015, Sandra Thompson forwarded you an email of 25 March 2015 from Stuart Wightman. Stuart Wightman's email of 25 March 2015 had in turn forwarded the email of 11 April 2011 sent by Jon Parker to Alison Clydesdale (referred to above). The Jon Parker email of 11 April 2011 explained, in terms, that RHI funding was not being treated as standard AME, and could have DEL consequences. It further appears that Sandra Thompson's email of 26 March 2015 was not responded to until 19 May 2015, when it was responded to by you with a warning. As to that:
- a. Please give an account of the discussion Sandra Thompson refers to having had with you in the body of her email of the 26 March 2015;

- b. In the discussion, what did Sandra Thompson ask you to do?
 - c. Why did it take until 19th May 2015 for you to reply to her email?
 - d. How long should it have taken you to reply?
 - e. Whom did you bring the email to the attention of, and when did you do so.
 - f. Please give an account of the preparation of your reply including when the work was done and by whom.
 - g. Should it have been elevated within the Division? Please explain the reasons for your answer.
 - h. At this point should the issue have been elevated to the Permanent Secretary? If not, why not? If yes, please explain the reason for your answer? If the issue should have been elevated to that level, but was not, then please explain why this did not happen.
36. Were you aware of, and/or involved in, a further sequence of emails of 19 and 20 May 2015 involving Finance Division telling Energy Division to stop entering any further RHI commitments, and/or that direction being rejected by Energy Division in favour of seeking further clarifications from DFP? As to that, what should have happened within Finance Division the moment it was known that the direction given (to stop entering into RHI commitments) was not going to be followed?
37. How significant an issue is it for DETI/DfE Finance Division that there may be an overspend and/or DEL consequence within the departmental budget, and what should happen if this is the case? Please explain the basis for your answer.

March 2015 to June/July 2015

38. Please set out and explain any involvement you had in dealing with the issue of the RHI Scheme and its budget implications between March 2015 and July 2015.
39. Please explain any steps you took to deal with, highlight and/or resolve issues relating to the RHI Scheme during that period.
40. Please describe any liaison you had with Stuart Wightman (or others in Finance Division, Energy Division or at more senior level in the Department) in respect of the RHI Scheme during that period.

Financial Forecasting

41. What discussions did you have over the financial information and forecasting you were receiving from Energy Division in relation to the RHI Scheme?
42. Please evaluate the financial information you were receiving from Energy Division in relation to the RHI Scheme. In particular, please indicate whether this information was useful and adequate. Please explain the reasons for your answer.
43. What steps did you, and Finance Division, take to improve any deficiencies being found with the financial information and forecasting in relation to the RHI Scheme?

Draft Ministerial submission about RHI of 7 July 2015

44. What involvement, if any, did you have in respect of the draft Ministerial submission about RHI of 7 July 2015 (actual submission dated 8 July 2015)?
45. If you were involved in the drafting of the submission what observations (if any) have you to make about it?

46. The draft Ministerial submission about RHI of 7 July 2015 appears to have described the source of RHI funding as AME, and thus not directly impacting Northern Ireland Departmental budgets. In relation to the submission in this regard:
- a. Was it accurate?
 - b. Should a more detailed explanation about AME with DEL consequences have been provided to the Minister?
 - c. If it is the case that the funding position was not as described in the draft submission, whose responsibility would it have been to correct that inaccuracy in the submission?

June/July 2015 to December 2015

47. Explain what involvement you had in respect of the RHI Scheme during the period June/July 2015 to December 2015?
48. If you consider that there were delays occurring within DETI during this period in addressing the problems that had become apparent with the RHI Scheme, then (in respect of each delay) please explain what the delays were, to what they related, what was causing them, who was responsible for them, and what was done to try to avoid them.
49. Please give a chronological account of the work done to obtain further funding to deal with the overspend accruing in the 2015/16 year. Please include what was done, who did it, what resulted from it, what the RHI budget had been, and, as a result of the work done, what the RHI budget became.

Lapse in DFP Approval in March 2015

50. What role, if any, does Finance Division play in relation to a scheme within Energy Division that needed renewed approval from DFP/DoF? Whose responsibility is it in the Department to recognise the need to renew and to begin the process? Does any responsibility lie within Finance Division? Please explain the basis of your answer.
51. If a renewal is due by March 2015 then when should the process of obtaining the renewal begin? Please explain the basis of your answer.
52. How, in practical terms, would you expect the need for renewal of DFP approval to be managed so as to ensure that it is not overlooked?
53. What role, if any, does DFP/DoF play in identifying that a requirement it had for renewal of approval had not been dealt with by a department such as DETI/DfE? Please explain the basis for your answer.
54. Please explain how the need for renewal of the DFP approval of the RHI Scheme was missed.

Communication arrangements over financial matters relating to the RHI Scheme

55. Given the potential involvement of HMT, DECC, DFP and DETI, what was your understanding of the communication mechanisms which were to operate in respect of the RHI Scheme?
56. How effective, or otherwise, were those mechanisms? Please explain the reasons for your answer.

Promotion of the Scheme

57. Specify whether you promoted the 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

58. 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 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.
59. Identify any instances, to your knowledge or belief, where influence or pressure was exerted on you in relation to any aspect of the 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.
60. Identify any instances, to your knowledge or belief, where influence or pressure was exerted on someone else in relation to the 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

61. Identify any instances, to your knowledge or belief, where a Minister, Special Adviser, Civil Servant or any other person involved in the 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.

62. Specify whether, to your knowledge, you have any connection to a person or body receiving payment under the 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

63. 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 Scheme, setting out details of when this occurred, to whom and by whom any relevant disclosure was made and how it was dealt with.
64. In particular, provide an account of how you dealt with any disclosures raising concerns about the Scheme made or communicated to you at any time. In relation to each such instance, identify precisely how the concerns were communicated to you.
65. Without prejudice to the generality of paragraph 64 above, provide a full account of the following matters in particular:
 - a. When you first became aware of communications from Janette O'Hagan to the Department, its Minister, and Departmental officials, commencing in 2013 and continuing until 2015, seeking to draw the Department's attention to alleged flaws in and/or abuses of the RHI Scheme;
 - b. How you became aware of the said communications and/or the issues being raised by Ms O'Hagan;
 - c. Every action you took to ensure that the concerns raised by Ms O'Hagan were investigated and addressed;
 - d. How, if at all, her concerns were investigated and addressed; and
 - e. Any steps which you consider ought properly to have been taken in response to Ms O'Hagan's communications but which were not taken either in time or at all.

66. Specify when you first became aware that subsidies payable under the 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

67. 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.
68. 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.
69. 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 388 of 2017

DATE:

Witness Statement of: Jeff Partridge

I, Jeff Partridge, will say as follows: -

Background

1. I commenced work in the NICS in June 1982. I have spent the last 24 years working in DETI Finance Division at EO2, Eo1, SO and DP grades, including working in Finance Branch for the last 14 years in my current grade. I have no formal accountancy qualifications, but have completed all AAT accounting technician examinations and have 9 'O' levels and 3 'A' levels including mathematics.
2. I was promoted in situ to DP in Finance Management Branch (FMB) in 2003, and held the post until I was transferred to Business Engagement Branch in June 2016 as part of an internal reorganisation of finance functions following the reduction in NI departments and the formation of DfE. My role in the DETI FMB included:

Monitoring of Expenditure – contributing to the management of DETI's resources including conducting monitoring exercises commissioned by DFP;

Budget / CSR Exercises – contributing to the completion of Budget Exercises commissioned by DFP for DETI allocations in forward years;

Financial Information - providing financial information to senior management on a monthly basis by way of departmental board reports covering budgets



and expenditure to date, and on an ad hoc basis by way of financial information for meetings with NDPBs and other DETI Businesses; and

Outturn - Reporting DETI monthly outturn and forecast outturn to Senior Management and DFP, and producing annual provisional and final outturn returns to DFP.

I was in this post and performed this role from the introduction of the RHI Scheme in 2011 until June 2016.

3. My involvement with the RHI scheme included allocating and monitoring overall budgets based on expenditure projections received from Energy Division, both for in-year budgets and across budget periods, and reporting outturn. During this period I reported to Bernie Brankin (G7) and Trevor Cooper (G5), and I had a team of two staff officers, an EO1, and two AOs reporting to me.

Finance Division within DETI/DfE

4. Finance Division provides core support functions to other departmental divisions and branches, and in essence has provided an unchanged role during my time in the division. Finance Division currently has four branches:
 - Financial Management** - Budgets, Estimates, Forecasts, Profiling
 - Financial Accounting** - Accounting, Accruals returns, journals, Account NI, Cognos Reporting
 - Financial Governance** - EU, Tax including VAT, Losses and Special Payments, Compliance
 - Commercial Services** - Procurement and Contract Management
5. Finance Division was headed by a grade 5 (Finance Director), with each of its branches headed by a grade 7. There was a division plan and individual branch plans, and each member of staff had a Personal Performance Agreement agreed with their line manager. Other accountability measures included the completion of Divisional Risk Registers and Six-monthly Assurance Statements.



6. Mechanisms for interaction between FMB and:
 - a. **DFP:** FMB held regular stock take meetings with DFP Supply Division, generally at G5 and G7 level. In general, all interaction between DETI and DFP relating to finance matters was channelled through FMB and directed to DFP Supply. Occasionally FMB also dealt directly with DFP Central Expenditure Division.
 - b. **Departmental Divisions:** FMB analysed information requests from DFP and sought input directly from Departmental Divisional contacts, usually by way of generic or specific commissioning notes.
 - c. **HMT:** FMB did not generally deal directly with HMT; this was a role performed by DFP.
 - d. HMT information was sent to DFP, which in turn informed FMB as required, which in turn informed Departmental divisions as required.
7. FMB provided a financial support function to DETI Divisions including the allocation of budgets, monitoring budget forecasts in-year and across forward years, adjusting budgets in-year, conducting multi-year forward budget exercises, and collating outturn information. This was usually performed through commissioning information from G5's copied to business area finance contacts. Occasionally information was also sought directly from these finance contacts. Returns requiring budget adjustments normally required sign-off at G5 level.
8. Before the start of each financial year, FMB allocated annual budgets to Business Areas, along with multi-year budgets if these were available. On a monthly basis FMB provided financial management reports and requested business areas to report actual spend to date and forecast expected spend across the remainder of the financial year. There were generally three in-year monitoring exercise in which business areas had with the opportunity to adjust

budgets. There were also separate in-year exercises (generally two per year) to profile / adjust AME budgets across current and forward years. Where applicable, FMB commissioned multi-year budget (CSR) exercises. In all exercises where financial information was requested, FMB provided a covering commissioning letter or email to G5's copied to finance contacts within each division, which included the purpose of the exercise, the action required from business areas, and templates showing the current financial information. Generally FMB required business areas to make their returns using the templates provided, and these normally requested both financial information and supporting narrative.

Finance Branch

9. Finance Division includes Financial Management, Financial Accounts, Financial Governance and Commercial Services. FMB's role within the division is to optimize, control and account for DETI's financial resources and assist in their efficient use, and to provide the Minister and Senior Management with briefing and financial information packs.
10. N/A.

General involvement with the RHI Scheme

11. I was part of a team that was involved in providing a financial support function to Energy Division including the allocation of budgets, monitoring budget forecasts in-year and across forward years, adjusting budgets in-year, conducting multi-year forward budget exercises, and collating outturn information. I performed this role from 2011 to 2016.
12.
 - a. The percentage of my role that was devoted to work on monitoring RHI Scheme budgets probably amounted to less than 1%. This increased from March 2015 when projected expenditure was first forecast to



exceed allocated budgets. However, I would say that the proportion would probably still have been less than 5%.

- b. I did not have any responsibilities in relation to RHI on a day-to-day basis. My role was limited to seeking Energy Division input to the normal budgeting, forecasting and profiling, and outturn exercises.
 - c. I would have interacted with my staff who were collating financial returns from Energy Division, and in dealing with any queries regarding budgeting and financial exercises, and I would have interacted with my line management regarding Energy Division input to financial exercises. I would also have interacted with Sandra Thompson, as our main finance contact in Energy Division, and latterly I also interacted with Stuart Wightman regarding expenditure forecasts.
 - d. My role and responsibilities in relation to the RHI Scheme was the same as with all other business areas in the department, and I received sufficient training and resources to fulfil this role for the department.
13. I was involved in confirming the initial RHI budget allocations to Energy Division for 2011-15, and I was involved in FMB's role in subsequent budgeting and monitoring exercises, profiling and forecasting, and outturn exercises. I had no input in respect of the setting up, design, implementation, operation, promotion, oversight, governance, amendment, suspension and/or closure of the Scheme, from its inception to the present day.
- 14.
- a. None, apart from confirming to Energy Division the budget allocations that FMB received from DFP Supply.
 - b. None.



- c. I was involved in providing tables of financial information including historical expenditure and budget forecasts to management in the period following the emergence of difficulties with the Scheme. I also had a number of meetings with David Conliffe (Accounts Branch) and Trevor Cooper to look at the methodology being used by Energy Division to make their expenditure projections to establish if it was sound or could be improved, and I had meetings with Energy Division regarding their forecasting methodology, looking at how different/updated forecasting models would impact on 2014-15 expenditure/accrual projections and the impact on future year budgets.
- d. None.
- i. N/A.
- ii. N/A.
- iii. N/A.
15. My first involvement with the RHI Scheme was in 2011 when FMB confirmed the DFP allocation of £25m budget for the period 2011-15 to Energy Division.
16. Budget profiles for RHI were always well within budget in the first four years of the Scheme, and the Scheme was beset with underspending against budget. The first profile received for budgets beyond 2014-15 was in an exercise conducted in August 2013 for budgets up to 2019-20, and these budgets were confirmed in a DFP Control Annex in October 2013. This was also the case in subsequent profiling where forward budgets were confirmed by DFP. It was not until March 2015 that I became aware of potential problems when Energy Division wrote to Finance Branch as they were unable to get advice from DECC on budgets for future years against an increasing profile of expenditure.
17. Initial budgets were allocated from DECC (GB) via DFP based on the Barnett Formula percentage of funding that determined the Northern Ireland share of

RHI budget. The 4-year budget for 2011-15 was confirmed to Energy Division, and the special treatment of this AME budget was explained to Energy Division verbally and by email. FMB staff and Energy Division contacts were fully apprised of the contents of the HMT email of 11 April 2011. The budget was then monitored by FMB as part of the profiling, forecasting and budgeting exercises used for other AME budgets. In the first four years of the RHI Scheme the budget was always underspent, so the special treatment attached to the RHI AME budget was not relevant during these years.

18. It was not my role to understand / judge the operation of the RHI Scheme. From a budgeting perspective the Scheme was perennially underspent and I therefore had no concerns regarding overspending. It was not until future expenditure profiles received from 2015 onwards began to show potential overspending that I first became concerned, but even at this stage I was not aware of any inherent flaws in the RHI Scheme.

The RHI Scheme and AME and DEL – 2011 emails

19. The term DEL stands for Departmental Expenditure Limit, and represents the expenditure limit within which a department has responsibility for resource allocation. DEL limits are set in spending reviews and may not be exceeded. The term AME stands for Annually Managed Expenditure and is expenditure that does not fall within DEL. AME expenditure is less predictable and controllable than DEL as expenditure may be demand led or have inherent volatility. AME requires careful monitoring and management and essentially is just as important as DEL.

DEL and AME are recorded separately in DoF and DfE databases, and are usually subject to separate monitoring exercises. FMB monitor both through monthly profiling, in-year monitoring exercises and outturn exercises.



20.

- a. I played no role in respect of this issue and cannot recall having input to Bernie's email.
- b. No. This was the first time I was ever aware of non-standard AME.
- c. It was significant in that the use of non-standard AME had the potential to create charges against DEL in future years if overspend occurred.
- d. At that time FMB had no indication of the format of how the RHI Scheme would operate. As Bernie pointed out to Energy Division, controls would have to be put in place to prevent significant over spending. I understood at that time (and Bernie made the point to me) that FMB would have to monitor this budget over the four year allocation (2011-15) and flag any potential overspend at the earliest opportunity. In the event, the RHI Scheme was very slow on the uptake with significant underspending and reprofiling or budgets, and there were no concerns of overspend until March 2015.
- e. My manager (Bernie Brankin, G7) was fully aware that the funding for the RHI Scheme was not standard AME from the point at which Jon Parker's email of 15 April 2011 was copied to FMB, as was I.
- f. In hindsight, we could have labelled the expenditure line and budget category in a way that signified the expenditure as non-standard AME. In allocating the initial budget, DFP included the RHI budget lines within the AME category along with the other standard AME lines, and a separate category of budget for non-standard AME was not created.
- g. No additional physical steps that I recall were taken to highlight the non-standard AME.



- h. At the time of the email in question from Bernie, Energy Division had not devised the RHI Scheme and how it would operate, and any steps to manage the budget effectively would have formed part of Energy Division's internal procedures.

Energy Division is responsible for managing their budget allocations effectively. My expectation would have been that Energy Division, as the budget holder, would have followed procedures to produce a business case which included expenditure controls, and obtain departmental and DFP approvals as required.

Whenever FMB confirms budget allocations before the beginning of each financial year, business areas are reminded that under no circumstances should commitments be entered into where they do not believe they will have sufficient budget cover to manage the in-year consequences thereof.

21. Non-standard AME was unusual, and the budget holder was aware of the consequences of issues surrounding the management of non-standard AME as evidenced by Jon Parker's email of 15 April 2011, Bernie Brankin's email of 3 May 2011 and Alison Clydesdale's email of 4 May 2011.

22.

- a. If expenditure exceeded budget in any given year, this could be addressed by reprofiling the future profiles so that the overall multi-year cost of the scheme was within budget.
- b. A 5% penalty relating to the amount of overspend in any year against approved budget could be levied.
- c. The 5% penalty would be taken from DETI's Resource DEL.
- d. The 5% would have to be managed from within the overall DETI Resource allocation.



- e. It was my understanding that the 5% could not be recouped.
23. The email from Jon Parker referring to the potential for a penalty to accrue against DETI's DEL budget was saved in the Finance area of TRIM, but was not highlighted in any FMB records or any subsequent correspondence up until the point where the potential to overspend was highlighted to FMB by Energy Division.
24. Not by FMB in my opinion. FMB raised the risk potential with Energy Division, but, as it was their scheme, in my opinion it was Energy Division's responsibility to highlight any associated risks to Senior Management when making spending proposals for the Scheme. The RHI budget was monitored by FMB as part of the profiling, forecasting and budgeting exercises used for other AME budgets. In the first four years of the RHI Scheme the budget was always underspent, so the special treatment attached to the RHI AME budget and the potential associated risk was not relevant during these years.
25. There were no non-standard AME budget lines within DETI finance computer systems and reports. In allocating the initial budget, DFP included the RHI budget lines within the AME category along with the other standard AME lines, and a separate category of budget for non-standard AME was not created.
26. No measures were in place in FMB to flag any risk associated with the management of non-standard AME. FMB staff were aware of the significance of ensuring that this non-standard AME budget was managed. In practice the RHI budget was monitored by FMB as part of the profiling, forecasting and budgeting exercises used for other AME budgets. In the first four years of the RHI Scheme the budget was always underspent, so the special treatment attached to the RHI AME budget was not relevant during these years.
27. AME budgets are monitored separately from the quarterly monitoring returns. There are sometimes only two DFP-led AME exercise in a year, although the timing of these sometimes coincide with in-year monitoring exercise for other budgets. The templates received from DFP placed RHI budgets within the same



category as other AME budget lines. DETI FMB generally used the same format to request updates from business areas.

28. DETI FMB were responsible for titling monitoring templates used to collate AME information from DETI business areas. It was therefore possible to title these differently, although when submitting the composite DETI return to DFP, FMB would but have changed the titles on DFP templates. FMB did not change titles to reflect the fact that RHI funding was non-standard AME. In practice the RHI budget was monitored by FMB as part of the profiling, forecasting and budgeting exercises used for other AME budgets. In the first four years of the RHI Scheme the budget was always underspent, so the special treatment attached to the RHI AME budget was not relevant during these years.

Previous experience of similar schemes

29. I have no experience of dealing with schemes that were similar in principle to the RHI Scheme. My role in FMB has entailed providing a financial support function to DETI business areas including the allocation of budgets, monitoring budget forecasts in-year and across forward years, adjusting budgets in-year, conducting multi-year forward budget exercises, and collating outturn information.
30. I was aware that Energy Division had experience of managing programme budgets and expenditure over a number of years, but I was not aware if any of this programme expenditure was on schemes similar to the RHI Scheme.
31. I was not involved with or gleaned any information from the Reconnect Scheme.
32. I have no previous experience of previous similar schemes, and therefore could not give any warnings in respect of the RHI Scheme based on previous experience.



2011 to March 2015

33. I was involved in confirming the initial RHI budget allocations to Energy Division for 2011-15, and I was involved in FMB's role in subsequent budgeting and monitoring exercises, profiling and forecasting, and outturn exercises.
34. Energy Division's RHI Scheme expenditure profiles started to ramp up for forward year budgets in AME exercises carried out between November 2014 and March 2015 as part of Budget 2015. These budget projections provided by Energy Division were included by FMB in DETI returns to DFP, and the requested budgets were confirmed by DFP in control annexes, including an AME Forecast Budget 2015 Final Position Confirmation Print dated 6 March 2015. This indicated that, although pressure was being experienced against RHI budgets, these were being addressed by DFP through AME forecasting and Budget exercises.
- a. Through returns to AME forecasting and Budget exercises from Energy Division and through telephone conversations with Energy Division (Sandra Thompson), who highlighted concerns about increased budget requirements in future years.
- b. See answer to 34 (a).
- c. See answer to 34 (a).

Emails of 26 March 2015, 19 May 2015 and 20 May 2015

- 35.
- a. The conversation with Sandra Thompson occurred two and a half years ago, and I cannot with any certainty recall the details of the conversation. I would imagine that the conversation covered the issues contained in Stuart Wightman's email to Sandra dated 25 March 2015



- b. Sandra said she would forward Stuart's email to me, and I assume she also asked me to contact DFP to seek answers to Stuart's questions.
- c. I was under considerable pressure in work at that time with a number of other exercises ongoing. This also coincided with the Easter break during which I had annual leave booked, and the SO in my section was also on leave for a few weeks during this period. However, the bottom line is that I didn't prioritise the email above other work as I knew that budget had been secured for the RHI Scheme for the period 2015-16 to 2020-21 in the latest profiling exercise, which matched the most recent budget profile received from Energy Division.
- d. In normal circumstances I would have expected to have responded within a week to ten days.
- e. I didn't bring the email to the attention of my line manager (Bernie Brankin) until she approached me to ask if I had received any contact from Energy Division regarding RHI. I cannot recall the exact date, but this would have been sometime in early May 2015.
- f. I discussed the email from Energy Division with Bernie Brankin, and I asked Bernie's advice on the content of my response.
- g. I did not elevate the email within the Division at the time of receipt as I knew that budget had been secured for the RHI Scheme for the period 2015-16 to 2020-21 in the latest profiling exercise, which matched the most recent budget profile received from Energy Division. When I eventually responded to the email the issue of difficulty with RHI budgets had been already brought to the attention of senior management within the Division.
- h. I cannot recall whether or not the issue was brought to the attention of the Secretary at this time. The issue of difficulty with RHI budgets had



been brought to the attention of senior management in Finance Division by the time I responded to the email on 19th May 2015.

36. I was aware of these emails as I was copied into them. I had no previous experience of Finance Division giving direction to stop entering into financial commitments or of such direction not being followed. As to what should have happened next, this should have been (and was) escalated, as evidenced by the emails now being written and sent between grade 5's and grade 7's in Finance and Energy Divisions.
37. FMB is responsible for managing the overall DETI budget and protecting the Accounting Officer. Where potential overspending is identified, FMB will look to take steps to minimise the effect by seeking underspending from elsewhere in the department that can be used to apply for virement approval from DFP to offset overspending. If not addressed, in-year overspending could lead to an excess vote, a qualified account and potential penalties imposed by DFP on DETI (and may even cause issues at Northern Ireland Block Grant level).

This may solve in-year issues, but both in-year and forward year difficulties were identified with RHI scheme expenditure forecasts. FMB therefore took steps to minimise overspending in future years by directing Energy Division to stop entering into financial commitments under the RHI Scheme.

March 2015 to June/July 2015

38. In addition to my actions detailed in the answers to questions 35 and 36, I was involved in providing information to my line management on budgets, estimates, forecasts and profiling using previous returns from Energy Division to historical exercises and current profiling information.
39. I was involved in a meeting with Stuart Wightman, Sandra Thompson, David Conliffe (Accounts Branch) and Suzanne Craig (Accounts Branch) on 1st June 2015 to gain a understanding of the history of the RHI scheme and the recent upsurge in applications that led to the budget pressures going forward, and the



methodology used in formulating forecast expenditure. I had a number of meetings with David Conliffe (Accounts Branch) and Trevor Cooper to look at the methodology being used by Energy Division to make their expenditure projections to establish if it was sound or could be improved. I had further meetings with David, Sandra and Stuart regarding their forecasting methodology, looking at how different/updated forecasting models would impact on 2014-15 expenditure/accrual projections and the impact on future year budgets. In FMB we also looked at ways of mitigating the in-year (2014-15) budget pressure through potential offsetting against any underspending identified in the remainder of the department.

40. See answers to questions 35 and 39.

Financial Forecasting

41. I cannot recall any specific discussions over the financial information and forecasting FMB was receiving from Energy Division in relation to the RHI Scheme from its inception until March 2015. Energy Division were experienced in providing financial information to FMB for their wider budget using the standard templates required for the various budgeting and forecasting exercises, and to my recollection we had no issues with the financial information and forecasting we received for the RHI Scheme. Once difficulties came to light, I was involved in the actions described at paragraph 39.
42. The financial information received from Energy Division was useful in informing the expenditure profiles for the RHI Scheme. The forecasts for the first three years of the RHI Scheme were hugely underspent, the reason for which was the extremely slow uptake of the Scheme. We had no concerns regarding forward year budgets until they started to ramp up in AME exercises carried out between November 2014 and March 2015 as part of Budget 2015. Energy Division indicated that this was due to increased uptake in the Scheme, and budget projections provided by Energy Division were included in DETI returns to DFP and confirmed by DFP in control annexes. I had no reason to challenge the accuracy of Energy Division's forecasts at this time as I understood that the



projections were as a result of a model informed by actual applications and payments made by Ofgen.

43. Whenever the budget pressures associated with the RHI Scheme were brought to light in May 2015, I had a number of meetings with David Conliffe (Accounts Branch) and Trevor Cooper to look at the methodology being used by Energy Division to make their expenditure projections in order to establish if it was sound or could be improved. I also had meetings with David Conliffe, Sandra Thompson and Stuart Wightman regarding their forecasting methodology, looking at how different/updated forecasting models would impact on 2014-15 expenditure/accrual projections and the impact on future year budgets.

Draft Ministerial submission about RHI of 7 July 2015

44. None that I can recall.
45. N/A
46. I did not see the draft Ministerial submission as far as I can recall.
- a.
- b.
- c.

June/July 2015 to December 2015

47. I had oversight of in-year monitoring and AME forecasting exercises, and was involved in the activities that I have described at paragraphs 38, 39 and 43.
48. I was not in a position to assess whether there were any delays within DETI during this period in addressing the problems that had been become apparent with the RHI Scheme.

49.

- 3-9-14: DFP exercise commissioned for OBR Autumn 2014 Fiscal Report with 2015-16 RHI Scheme budget set at £9,000k.
- 1-9-14: Energy Division submit revised profile to FMB requesting increase in 2015-16 RHI Scheme budget to £11,000k.
- 9-10-14: FMB make DETI return to DFP requesting increase in 2015-16 RHI Scheme budget to £11,000k.
- 22-10-14: DFP confirm increase in 2015-16 RHI Scheme budget to £11,000k.
- 28-11-14: DFP Commission AME Forecast for Chancellor's Budget 2015 with 2015-16 RHI Scheme budget set at £12,140k.
- Energy Division reduce budget requirement to £11,640k
- 6-3-15: DFP confirm 2015-16 RHI Scheme budget as £11,640k.
- 10-3-15: FMB confirm 2015-16 RHI Scheme budget to Energy Division as £11,640k.
- 30-4-15: Energy Division flag RHI Scheme pressures as part of June Monitoring, indicating a total budget requirement for 2015-16 of £25,000k.
- 19-5-15: DFP commission AME forecast for Chancellor's Summer Budget 2015 with 2015-16 RHI Scheme budget set at £11,640k. No opportunity provided to amend 2015-16 budgets.



- 4-6-15: FMB write to DFP on June Monitoring and flag increased pressures in RHI Scheme budgets for 2015-16 from £11.6m to £23m.
- 20-7-15: DFP confirmation print on June Monitoring confirming 2015-16 RHI Scheme budget at £23,178k.
- 23-9-15: DFP commission Autumn 2015 AME Forecast.
- 2-10-15: Energy Division request decrease in 2015-16 RHI Scheme budget to £22,816k.
- 8-10-15: FMB submit DETI return with requesting increase in 2015-16 RHI Scheme budget to £22,816k.
- 11-12-15: FMB commissions January Technical Monitoring 2015-16 and 2015-16 AME Update with RHI Scheme budget set at £22,816k.
- 22-12-15: Energy Division request increase in 2015-16 RHI Scheme budget to £30,400k.
- 5-1-16: FMB submit DETI return with requesting increase in 2015-16 RHI Scheme budget to £30,400k.
- 18-1-16: DFP confirmation print on January Monitoring confirms increase in 2015-16 RHI Scheme budget to £30,400k.

Lapse in DFP Approval in March 2015

50. Finance Division (Accountability and Casework Branch) is the conduit through which Energy Division would submit requests for DFP approval for expenditure. However, Finance Division has no responsibility in recognising the need to renew and to begin the process for renewal of DFP approval for expenditure. This is solely the responsibility of the spending Branch, in this case Energy Division.



51. Approvals were not part of my role and I do not know the answer to this question.
52. Approvals were not part of my role and I do not know the answer to this question other than by pure speculation.
53. It is my understanding that DFP plays no role in identifying a requirement for renewal of approval for expenditure outside DFP.
54. Approvals were not part of my role and I do not know the answer to this question other than by pure speculation.

Communication arrangements over financial matters relating to the RHI Scheme

55. See response to question 6. No special / alternative arrangements were put in place in respect of the RHI Scheme.
56. These communications arrangements worked fine initially as we were allocated budget cover for a four year period (2011-15) and there was no pressure on the RHI Scheme budget. However, as evidenced by the email trail attached to Sandra Thompson's email of 26 March 2015, communication difficulties began to emerge from around this time.

Promotion of the Scheme

57. I have never been involved in any of the activities described in this question.

Lobbying and pressure

58. I have no knowledge of any of the activities described in this question.
59. I have no knowledge of any of the activities described in this question.



- a.
- b.
- c.
- d.
- e.

60. I have no knowledge of any of the activities described in this question.

- a.
- b.
- c.
- d.
- e.
- f.
- g.

Standards of conduct and conflict of interest

61. I have no knowledge of any of the activities described in this question.

- a.
- b.

62. To my knowledge I have no connection to any person or body receiving payment under the RHI Scheme or benefitting commercially from the Scheme in some other way.

Whistle-blowing and raising of concerns

63. I have no knowledge of any of the activities described in this question.

64. I have no knowledge of any of the activities described in this question.

65. N/A – I have no knowledge of this communication.

a.

b.

c.

d.

e.

66. To my recollection I only became aware of this whenever it reached the public domain and was reported in the media.

General

67. None.

68. None.

69. None.

Statement of Truth

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

Signed:



Dated: 30 August 2017