



RENEWABLE HEAT
INCENTIVE INQUIRY

WIT-29087

RHI Inquiry

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By email to: Laura.McPolin@finance-ni.gov.uk

16 July 2018

Dear Madam,

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 are already very familiar with the work of the Inquiry and its Terms of Reference.

The Inquiry is grateful for the detailed evidence, both oral and written, already provided by you. That evidence has, along with evidence from other persons and organisations, been considered by the Inquiry and there are a number of further matters arising therefrom in respect of which the Inquiry wishes to ask you questions. The Inquiry also wishes to afford you an opportunity, at this stage, to

Chairman: **Rt Hon Sir Patrick Coghlin** | Secretary: **Andrew Browne** | Solicitor: **Patrick Butler**

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Annotated by RHI Inquiry

address any issues arising from the evidence of other witnesses provided since 26 January 2018¹ which you consider it necessary to address.

In the circumstances, please find enclosed with this letter a further Section 21 Notice requiring you to provide evidence to the RHI Inquiry Panel in the form of a further 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 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.

As you are aware, receipt of this correspondence and its enclosures places you under a duty of confidentiality to the RHI Inquiry in respect of them. You may share the correspondence and the enclosed Notice with your legal representative(s), but neither you nor they may show, communicate the contents of, nor provide this correspondence or the Notice 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. In addition, a similar restriction is contained in Restriction Order No 2 of 2017 made by the Inquiry Chairman and available on the RHI Inquiry website.

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

¹ The last day of your oral evidence to the Inquiry.

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 stylized flourish at the end.

Patrick Butler

Solicitor to the RHI Inquiry

0289040892

SCHEDULE**[No 134 of 2017]***The 2012 CEPA Addendum Report*

1. In your witness statement of 24 January 2018 (**WIT-29079 to WIT-29086**) at paragraphs 7 to 13 (**WIT-29080 to WIT-29082**) you address the NPV recalculation, reassessment, or reconsideration that you believe you carried out in respect of the proposed NI RHI Scheme in light of the increased costs of, and increased carbon savings attributable to, that proposed Scheme as a result of the CEPA Addendum Report of February 2012. This issue was also explored in some detail in your oral evidence on 26 January 2018 (**TRA-3511 to TRA-3553**), during which you acknowledged (e.g. at **TRA-3532**) that the NPVs of the other options (i.e. those scheme options other than the proposed NI RHI) ought to have been reassessed, recalculated, or reconsidered at the same time. CEPA were asked, in Section 21 Notices 5 and 9 of 2018, to address a number of questions relevant to this issue. Their further evidence in this regard is contained in the witness statement of Mark Cockburn of CEPA of 22 February 2018 (**WIT-108105 to WIT-108149**). The analysis summarised by Mr Cockburn at **WIT-108132/3** and **WIT-108140 to WIT-108145**, subject to the caveats set out at **WIT-108140** and **WIT-108142**, appears to show that, had a reassessment, recalculation, or reconsideration in respect of the NPV of all options been undertaken at the time of the Addendum Report it would have shown a NPV of the NI RHI under the 'Funding 2' scenario of -£264 million (**WIT-108132/3**) and a NPV for the Challenge Fund under the same funding scenario of £104 million (**WIT-108143**, Table, 2nd row under the heading 'Updated values using 2012 model'), thereby indicating that the gap between these two possible incentive schemes had widened by approximately £150 million (the NPVs of the Schemes having previously been calculated in 2011 to be -£24 million for the Challenge Fund and -£242 million for the NI RHI). In light of this evidence, please address the following:
 - a. Confirm that you agree that this evidence helps illustrate why, following receipt of the 2012 CEPA Addendum Report, there ought to have been

a reconsideration of the various scheme options and, in particular, a reassessment, recalculation, and/or reconsideration of the NPV of each option and, in particular, the NI RHI and the Challenge Fund;

- b. Confirm that you agree that this evidence helps illustrate both the risks associated with a 'high level' analysis of the type you believe you undertook in respect of the NPV of only one scheme option and of failing to revert to the expert economic consultants (CEPA) on these issues;
- c. Clarify whether you wish to alter or supplement your evidence to date on these issues in light of the further statements from Mr Cockburn on behalf of CEPA and, if you do, please provide your further evidence at this point.

The Business Case for the Domestic RHI Scheme

- 2. Your involvement in the economic appraisal and business case in respect of the Domestic RHI Scheme was touched upon in your oral evidence on 25 January 2018 (**TRA-3344 to TRA-3358**). You are now referred to the following documents in this regard:
 - a. An email chain relating to the period 11 June 2014 to 23 July 2014 and recording, *inter alia*, involvement that you had in considering the aforementioned economic appraisal and business case (**DFE-192158 to DFE-192161**);
 - b. The CEPA economic appraisal of June 2013 entitled 'Development of Phase II of the Northern Ireland Renewable Heat Incentive' (**DFE-91714 to DFE-91845**);
 - c. The 'Business Case for the Introduction of the Domestic Renewable Heat Incentive' (**DFE-270800 to DFE-270851**);

Please now address the following issues relating to your involvement in considering the said economic appraisal and business case:

- i. Explain the precise role you played in respect of each document (for example, considering same, suggesting amendments to same, approving same, and so on) and in respect of the Domestic RHI Scheme;
- ii. Without prejudice to the generality of the foregoing request, explain the extent to which your role in respect of the said documents and Scheme differed from the role you played in respect of the Non-domestic RHI Scheme during 2011 and 2012;
- iii. Specify (A) when you first became involved in performing any role in respect of the said documents and the Domestic RHI Scheme, (B) the approximate amount of time you spent dealing with the said matters, and (C) the date of your last involvement in the said matters;
- iv. In the event that you considered a draft or drafts of the business case which differed from the one referred to at paragraph 2.c of this Schedule, then please identify the precise draft or drafts that you considered (or, if that is not possible, state how the document referred to at paragraph 2.c differs from the draft(s) considered by you);
- v. Identify any documents which record or relate to work performed by you in respect of the Domestic RHI Scheme and, in particular, the economic appraisal and business case for same (such documents might include, but not be limited to, emails, documents you saved on TRIM, and documents that you did not save on TRIM);

- vi. Explain the regard that you had to each of the following issues when performing your work in respect of the Domestic RHI Scheme and the economic appraisal and business case for same (including, if it is the case that you had *no* regard to a particular issue, the reasons for this):

Cost Controls

- (A) The fact that the introduction of an overall cost control mechanism for the Non-domestic and Domestic RHI Schemes had been consulted upon as part of the Phase II public consultation, the fact that the introduction of a Domestic RHI Scheme was going to increase the demand upon the RHI budget, and the fact that the Domestic RHI Scheme Business Case does not appear to address the issue of cost controls or the risk to the RHI budget;

The Target of 10% Renewable Heat by 2020

- (B) The fact that there was a target of 10% renewable heat by 2020 in place, that the CEPA economic appraisal of June 2013 was now suggesting that it would not be met, even with the introduction of a Domestic RHI Scheme (see, in particular, **DFE-91766**, Table 7.2), and the fact that the Domestic RHI Scheme Business Case does not appear to address this issue in detail (e.g. it does not include failure to meet the 2020 target in the list of risks set out in section 7 of the Business Case beginning at **DFE-270836**);

Reverting to DFP in respect of the Non-Domestic RHI Scheme

- (C) The possibility of reverting to DFP in respect of the Non-Domestic RHI Scheme in line with the conditions set out in DFP's letter of approval of 27 April 2012 (**DOF-3244/5**) and/or

paragraph 8.10.10 of the NIGEAE (DOF-60301) because of substantial changes in the said Scheme and/or the assumptions underlying it such as, for example, CEPA's revised opinion that the Scheme would not now enable DETI to achieve the '10% renewable heat by 2020' target or the revised Scheme review date (see the following sub-paragraph in this particular regard);

2014 Review of the Non-Domestic RHI Scheme

(D) The fact that you were aware that, at or about the time when the Non-Domestic RHI Scheme was approved in 2012, DETI had committed to reviewing the said Scheme in 2014 (see, for example, the Casework Synopsis, Casework Committee minutes, Business Case, and DFP approval letter) whereas the Domestic RHI Scheme Business Case suggested, at paragraph 10.10 (DFE-270846), that no review would begin until 2015;

Value for Money, Cost / Benefit and Compliance with the NIGEAE

(E) The particular issues of value for money, cost / benefit, and compliance with the NIGEAE given that the proposed Domestic RHI Scheme was going to cost £92 million, yield a benefit of £36 million, more than double the cost of each tonne of carbon saved, contribute only an additional 132GWh of annual heat, and not result in DETI meeting the '10% renewable heat by 2020' target mentioned above (see, in this particular regard, DFE-270821 and the table on that page);

- vii. In the event that you believe that there were any short-comings in, or sub-optimal features of, DETI's approach to the Domestic RHI Scheme and/or the business case in respect of same (such as, for example, not affording you an adequate amount of time to consider

matters) then please provide full details of each and every short-coming and, if known, the reasons for same;

- viii. In particular, but without prejudice to the generality of the foregoing, if you consider that the Domestic RHI Scheme afforded an opportunity to consider or address issues in respect of the Non-domestic RHI Scheme (such as, for example, the lack of cost controls), then please provide details of the opportunity it afforded, whether (in your view) that opportunity was taken, and, if it was not taken, the reasons for this.

The 2015 Addendum Business Case

3. In your oral evidence on 25 January 2018 you confirmed that you moved from DETI to DFP Rating Policy Division in July 2014. In this regard, please address the following issues:
 - a. confirm that you had no involvement in work in respect of, or related to, the Addendum Business Case in respect of the RHI Scheme (**DFE-336211 to DFE-336238**);
 - b. in the event that you did, in fact, have some involvement in work in respect of, or related to, the Addendum Business Case in respect of the RHI Scheme then please provide full details of this (including details of the work done by you, the date(s) when you performed that work, and any documents that evidence that work).

The Evidence of Other Persons Called Since 26 January 2018

4. Various DETI officials and other persons have provided oral evidence in public to the Inquiry since you completed your oral evidence on 26 January 2018 and the transcripts of the evidence of those witnesses are publically

available. To the extent that you consider the evidence of any of those persons contradicts your evidence on a significant issue, or is materially incomplete in respect of any significant issue, you should take this opportunity to address those issues by way of further written evidence, but only to the extent that the said issues have not already been addressed in your existing oral and written evidence.

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 134 of 2018

DATE: 6th August 2018

Witness Statement of: Samuel Connolly

I, Samuel Connolly, will say as follows: -

The 2012 CEPA Addendum Report

1. In your witness statement of 24 January 2018 (WIT-29079 to WIT-29086) at paragraphs 7 to 13 (WIT-29080 to WIT-29082) you address the NPV recalculation, reassessment, or reconsideration that you believe you carried out in respect of the proposed NI RHI Scheme in light of the increased costs of, and increased carbon savings attributable to, that proposed Scheme as a result of the CEPA Addendum Report of February 2012. This issue was also explored in some detail in your oral evidence on 26 January 2018 (TRA-3511 to TRA-3553), during which you acknowledged (e.g. at TRA-3532) that the NPVs of the other options (i.e. those scheme options other than the proposed NI RHI) ought to have been reassessed, recalculated, or reconsidered at the same time. CEPA were asked, in Section 21 Notices 5 and 9 of 2018, to address a number of questions relevant to this issue. Their further evidence in this regard is contained in the witness statement of Mark Cockburn of CEPA of 22 February 2018 (WIT-108105 to WIT-108149). The analysis summarised by Mr Cockburn at WIT-108132/3 and WIT-108140 to WIT-108145, subject to the caveats set out at WIT-108140 and WIT-108142, appears to show that, had a reassessment, recalculation, or reconsideration in respect of the NPV of all options been undertaken at the time of the Addendum Report it would have shown a NPV of the NI RHI under the 'Funding 2' scenario of -£264 million (WIT-108132/3) and a NPV for the Challenge Fund under the same funding



scenario of £104 million (WIT-108143, Table, 2nd row under the heading 'Updated values using 2012 model'), thereby indicating that the gap between these two possible incentive schemes had widened by approximately £150 million (the NPVs of the Schemes having previously been calculated in 2011 to be -£24 million for the Challenge Fund and -£242 million for the NI RHI). In light of this evidence, please address the following:

- a. I do not agree that this evidence referred to above helps to illustrate that there ought to have been a reconsideration of all of the various scheme options, and in particular a reassessment, recalculation and/or reconsideration of the NPV of each option, in particular being the NI RHI and the Challenge Fund.

My oral evidence to the Inquiry reflected my understanding that the NIGEAE guidance (section 2.4.13) recommends that all options should be updated if assumptions change.

However having reflected on this issue when considering this question, and having considered other sections of the guidance (noted below) it is my considered view that the correct approach is not as simple as a full reconsideration of the NPV of the options. In certain circumstances, and in particular in the circumstances that existed in this instance, in my view, the constraint that emerged during the appraisal process in respect of the Challenge Fund, operated so as to prevent it being taken forward as a viable option. In this case I do not believe that it was necessary to update the NPV associated with an option that was ruled out.

This approach would be in accordance with the NIGEAE guidance relating to options analysis, in that it is clear (from paragraphs 2.4.3 and 2.4.4) that options can be ruled out and not taken forward if they violate important constraints e.g. policy commitments or budgets, and

RENEWABLE HEAT
INCENTIVE INQUIRY

that the amount of effort to devote to this is a matter for case by case judgement. In this case, the Challenge Fund option violated the constraints of internal administrative budgets, as was eventually confirmed to the Casework Panel, and noted within the Business Case to DFP.

Although section 2.4.4 deals mainly with long listed options, I believe that the underlying principle is that there is simply no point in pursuing an option that has no chance of being selected as a preferred option. This point reflects the evidence within paragraph 21 (WIT 10335) of my first witness statement where I made the point that it is highly likely that the Challenge Fund would have been ruled out as a realistic option within the CEPA report and may not even have formed part of the original assessment if the budgetary constraint in respect of administration had been confirmed by Energy Division at that time.

However, the rationale for this approach should have been made clearer within the documentation provided to the casework panel by Energy Division, including detailed explanations as to why the Challenge Fund option had been ruled out. I also accept that I should have made a reference to this issue within my sign off note.

In my view, greater transparency around this issue would have been best achieved by Energy Division preparing a new economic appraisal prior to the casework meeting, setting out the latest position on all of the options, giving the precise reasons why the Challenge Fund was no longer being taken forward, as well as the updated NPVs associated with the other viable options.

This was the approach eventually adopted by Peter Hutchinson when he drafted the Business Case to DFP, subsequent to the Casework meeting. This document was approved by DFP economists and supply officials and at no point did they query the lack of a NPV figure for the



Challenge Fund option, despite it featuring in the 2011 CEPA economic appraisal that they had also received.

I would also add that in my view, the Business Case document that was sent to DFP should have been produced prior to the casework meeting (as would normally have been the case) to inform the casework panel of the latest/most accurate position of the project. In my view this document attempts to reflect the position of the project at February 2012 as it attempts to refresh and update the CEPA 2011 Economic Appraisal that was finalised in June 2011, as well as the updated tariffs, information contained within the Addendum and details of administration by Ofgem

I would also add that there was an awareness at the time of the casework meeting that a Business Case document would be forthcoming, as reference is made to "a final Business Case being submitted to DFP" within Peter Hutchinson's Synopsis paper (para 59 WIT-02245). I have no recollection of my thoughts surrounding this issue at the time, however it is possible that this knowledge contributed to my understanding that the CEPA 2011 Economic Appraisal was indeed an older document and was no longer reflective of the actual status of the project, (as I understood it at the time) and that subsequent to the synopsis paper, the project would be formally updated in a more complete way by producing this new document i.e. the business case to DFP. This would then be the opportunity to document the latest position of the project/refresh options (including the Challenge Fund) as the Inquiry has correctly recognised was necessary subsequent to the Addendum report being prepared by CEPA.

- b. I would agree that there were risks involved in using high level analysis to assess the NPV associated with the NI Alt Option with the information contained within the addendum report. I would also accept that as I did not understand how the significant increase in carbon

RENEWABLE HEAT
INCENTIVE INQUIRY

could be achieved, (whilst there being no corresponding significant increase in heat output) I should have, at the very least, referenced this point within my sign off note or requested Energy Division clarify this point with CEPA.

I believe the reason I was content with high level analysis in these circumstances was that I had a high regard for CEPA's work and confidence in the outputs that they produced i.e. expected that there would be a sound rationale between the increase in carbon and negligible change in heat output. I also believe that part of the reason I was willing to accept high level analysis was that I was operating under incredible time pressure, CEPA had already finalised their report, and I did not consider that reverting to CEPA in those particular circumstances was a realistic prospect for Energy Division. I also considered that the adverse impact of any further delay would be disproportionate to any potential benefit that interrogating the report further might yield.

However I remain of the view that I relayed this information to Peter Hutchinson as part of a phone call to discuss the final addendum report, with accompanying caveats that it was high level and that it was up to Energy Division to revert to CEPA if they thought it necessary. Consequently Energy Division were aware that there was a significant increase in carbon saved without any corresponding increase in heat output and would have been better placed to understand the dynamics of renewable technologies/uptake than I was (especially given my role as a relatively junior Deputy Principal economist, located within Analytical Services Unit with no experience of renewable heat).

If I had been of the view at the time, that a Challenge Fund remained a realistic option being put forward by Energy Division, I like to think that I would have advised Energy Division that the NPV associated with the Challenge Fund should also be updated, and that consequence to any such advice, CEPA would have undertaken the analysis, not least



because there was no data referring to the challenge fund contained within the Addendum Report. As I did not believe that the Challenge fund remained an option, I did not believe that there was any value in advising Energy Division to revert to CEPA in respect of obtaining a comparison between the NPV of the Challenge Fund and tariff options.

- c. Having considered the further evidence from Mr Cockburn I note that he states that the updated NPV of the NI Alt Option based on the cost information within the addendum was -£264m. This compares to a figure of -£239m that I suggested to the inquiry was the figure I likely calculated at the time.

The only point I would make relating to CEPA's figure, is that it would have been possible to take account of more accurate figures for administering the NI RHI Alt option at February 2012.

Using the figure of £9m that I suggested to the Inquiry instead of £44.5m, CEPA's analysis would result in a figure of -£228.5m (-£264m + £44.5m -£9m). Alternatively if I had used the full £44.5m or 10% for administering the scheme, the figure I calculated would have increased to -£274.5m (-£239m + £9m - £44.5m), which would have been 4% higher than the equivalent CEPA figure.

I have nothing further to add except as set out under (a) above.

The Business Case for the Domestic RHI Scheme

2. Your involvement in the economic appraisal and business case in respect of the Domestic RHI Scheme was touched upon in your oral evidence on 25 January 2018 (TRA-3344 to TRA-3358). You are now referred to the following documents in this regard:
 - a. An email chain relating to the period 11 June 2014 to 23 July 2014 and recording, *inter alia*, involvement that you had in considering the

RENEWABLE HEAT
INCENTIVE INQUIRY

aforementioned economic appraisal and business case (DFE-192158 to DFE-192161);

- b. The CEPA economic appraisal of June 2013 entitled 'Development of Phase II of the Northern Ireland Renewable Heat Incentive' (DFE-91714 to DFE-91845);
- c. The 'Business Case for the Introduction of the Domestic Renewable Heat Incentive' (DFE-270800 to DFE-270851);

Please now address the following issues relating to your involvement in considering the said economic appraisal and business case:

- i. The only involvement I had in considering the CEPA economic appraisal is outlined within the email chain (DFE-192158 to DFE-192161). I had no prior consideration of this document and the request to consider it by Shane Murphy was, as far as I am aware the first and only time that I examined it.

I do not believe that I ever saw the Business Case and played no role in the processing of the Domestic RHI Scheme whatsoever. To the best of my knowledge and recollection I was no longer working on business cases for some time prior to the summer of 2014 (I would estimate for at least 6 to 9 months) having moved roles to assist the work of the Economic Advisory Group. In any event, I left the Department on the 7th of July 2014 to take up a new role within DFP's Rating Policy Division.
- ii. As Shane Murphy noted in his email request concerning this business case, my review of it was to be "short and quick" and "any assessment will be unable to get into the detail". I have no recollection of what my thoughts were on this document, however based on my response to Shane Murphy it is likely that I simply



reviewed the document to establish whether the “ten steps” had been documented and structure of the document was complete.

This would have been in contrast to my involvement with the 2011 CEPA appraisal, that included a detailed review and production of economist comments to offer advice on the appraisal content, as well as the consideration of revised drafts.

- iii. It would appear that I first got involved with the Domestic RHI scheme upon the receipt of Shane Murphy's email on 11 June 2014. I can only estimate that the approximate amount of time that I spent on this matter could not have exceeded 2 hours. My involvement in this matter ended with my response to Shane Murphy on the 13th of June 2014.

I had no involvement with the Business Case for the Introduction of the Domestic Renewable Heat Incentive.

- iv. I had no involvement with the Business case for the Introduction of the Domestic RHI and so did not consider any other drafts of the business case, other than that referred to above.
- v. I produced no documents to which the question refers.
- vi. Explain the regard that you had to each of the following issues when performing your work in respect of the Domestic RHI Scheme and the economic appraisal and business case for same (including, if it is the case that you had *no* regard to a particular issue, the reasons for this):

Cost Controls



RENEWABLE HEAT INCENTIVE INQUIRY

(A) I had no involvement with either the consultation or the Domestic RHI Business Case, consequently I was not in a position to 'join any dots' between the two business cases.

The Target of 10% Renewable Heat by 2020

(B) I had no involvement with the Domestic RHI Business Case and consequently no opportunity to have regard to this issue.

Reverting to DFP in respect of the Non-Domestic RHI Scheme

(C) I have no recollection of DFP's conditions of approval and consider it unlikely that I was ever made aware of those conditions. In any event, it was never part of an economist's role to monitor conditions of approval or consider whether assumptions were proving to be incorrect. This was always the responsibility of the business area, with the economists being in a position of offer advice on these type of issues if requested.

2014 Review of the Non-Domestic RHI Scheme

(D) I had no involvement with the Domestic RHI Business Case and so was unable to reach any view about the revised date for when the review of the Non-Domestic RHI was planned to occur.

Value for Money, Cost / Benefit and Compliance with the NIGEAE

(E) I had no involvement with the Domestic RHI Business Case and so had no view on the issues of value for money etc.

vii. I am unsighted as to what approach DETI adopted in respect of the Domestic RHI scheme. As noted above my consideration of the



CEPA appraisal was “short and quick” and I am unaware to what extent Alan Smith, who was the economist covering Energy Issues at that time, was involved with these documents.

If my review of the CEPA appraisal on 11th of June 2014 was the first time an economist reviewed it prior to it being submitted to DFP, then this would have been inadequate and outside of normal working practice. I would however be extremely surprised that this was the case, as an appraisal could not normally receive casework approval, without an economist having had examined it as part of an iterative process.

- viii. I consider my involvement with the CEPA Phase II Economic Appraisal to have been minimal, and as I had no involvement with the Business Case, I am not aware of there being any opportunities to have considered issues as the question suggests.

The 2015 Addendum Business Case

3. In your oral evidence on 25 January 2018 you confirmed that you moved from DETI to DFP Rating Policy Division in July 2014. In this regard, please address the following issues:
- a. I can confirm that I had no involvement with the Addendum Business Case.
 - b. See above response to 3 (a)

The Evidence of Other Persons Called Since 26 January 2018

4. I have no further information to add.



RENEWABLE HEAT
INCENTIVE INQUIRY

Statement of Truth

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

Signed: Samuel Connolly

Dated: 06/08/18