

Appendix 1 – Consultation questions

Output consultation questions

GDQ1. Do you have any views on our common outputs that haven't been covered through any of the specific consultation questions set out elsewhere in this chapter? If so, please set them out, making clear which output you are referring to.

Yes - contained in our email sent in response to our FOI request to Ofgem which answered there is no justification for extending the scope of the gas emergency service.

We consider this a vital issue for this question.

The problem is consumer vulnerability seems wrongly confined to issues such as age, disability and fuel poverty while we consider all consumers are vulnerable to carbon monoxide (CO).

Furthermore, when consumers are exposed to non fatal levels of CO and other products of combustion, this affects their health and brain functions and so they become extremely vulnerable however wealthy, brilliant or competent before exposure.

This consultation document seems to leave out this issue despite the fact Jonathan Brearley orally assured us and everyone at the All Party Parliamentary Group meeting in summer 2019 he recognised all consumers are vulnerable to CO and consumers exposed to CO were particularly vulnerable.

We ask our response by email to Ofgem's response to our FOI request be also included as an answer to this question.

GDQ2. What are your views on the reporting metrics we have proposed for the consumer vulnerability ODI-R?

This seems an attempt to reduce amount of time spent but our apologies if we have this wrong. We don't think it sensible to reduce time spent by the GDNs. Indeed, in our opinion, they should be allowed longer. We can see consumers should be inconvenienced as little as possible but if a job takes longer to produce a safe result then it may be necessary to delay another consumer.

However, isn't this a matter of good communication with consumers and the correct staffing levels, not cutting everything to the bone on the altar of cost cutting at the expense of safety?

GDQ3. What are your views on the design of the annual showcase events, including whether they should be held at a national or regional level?

Showcase events should be both regional and national.

We think, rather than concentrating only on success in raising awareness of the dangers of CO or keeping people warm when gas is cut off, it would help to highlight data of call outs due to CO alarm soundings, know how many ppm of CO were emitting from a gas appliance and confirm help then offered with feedback from those consumers/survivors, not just those who work for the GDNs.

Having an organisation that works for consumers exclusively would greatly assist this.

GDQ4. Do you agree with our position to change the FPNES from a PCD to a capped volume driver?

We don't fully understand this question - If you mean to change to a rigid allowance of £30 million, we do not think that is enough.

GDQ5. For GSOP3, is a 48 hour exclusion period for the provision of access to hot water and food in the event of a major incident appropriate? Should this be extended to cover interruptions that are not a major incident?

We're sorry if we have misunderstood this - It seems no hot water & food is offered for 48 hours. We don't think this exclusion period is appropriate and should certainly not be extended.

Indeed, why doesn't the duty to provide hot water and food start after four hours? How often do most people eat & drink hot drinks? Perhaps baths and showers could be put off for 12 hours but, in time of Covid-19, we're not sure that is practical.

GDQ6. In relation to our proposal to extend quotation GSOPs ([Guaranteed Standards of Performance](#)) on entry and exit connections, is it sufficient – in regard to green gas entry enquiries – for these GSOPs to apply to the provision of initial and full capacity studies? Are there other parts of the green gas entry process we need to consider to ensure an improved service provision?

We've struggled to know what GSOP means and think we've succeeded – however, we have no idea what the 'green gas entry process' is so cannot comment.

We'd be happy to comment if we could be educated first.

GDQ7. What are your views on our consultation position to monitor the provision of and adherence to appointment timeslots for purge and relight activity through an ODI-R? Are our suggested reporting measurements reasonable?

We don't understand the question well enough.

If you mean again time is confined for purging and relighting then, because there should also be testing of emissions for carbon monoxide, we think adherence to timeslots would jeopardise safety.

It follows that suggested reporting measurements are unlikely to be reasonable.

Only questions 1-7 seem to be ones we can answer due to their technical language.

We are an obvious stakeholder so need to be more included. Yet we are a tiny charity with no paid employees except one colleague working limited hours on our data collection, collation and publication.

Although I, Stephanie Trotter, and other directors do our utmost, it is difficult to devote enough time to Ofgem and the GDNs particularly when we feel our contributions are not very welcome.

We feel we are not treated as full stakeholders, yet we represent the consumers Ofgem has a duty to protect!

GDQ8. Do you agree with our proposed option to provide Cadent and SGN with consumer funding through totex baseline or a financial ODI reward for collaborative streetworks activities?

We don't understand the question well enough – see our response to Q7

GDQ9. How should we set targets for the shrinkage financial incentive?

[We don't understand the question well enough – see our response to Q7](#)

GDQ10. Do you have any views on what clarifications are needed to ensure a consistent method of calculating the benchmark shrinkage volumes?

[We don't understand the question well enough – see our response to Q7](#)

GDQ11. Do you think a deadband should apply to the financial incentive? If so, please provide evidence as to how this could be quantified.

[We don't understand the question well enough – see our response to Q7](#)

GDQ12. What are your views on our consultation position for the four GDNs' EAP proposals in RIIIO-2 as set out in this document?

[We don't understand the question well enough – see our response to Q7](#)

GDQ13. Do you agree with our consultation position to include progress on beimethane in GDN's AERs, alongside standard connections data?

[We don't understand the question well enough – see our response to Q7](#)

GDQ14. Do you have any other comments in relation to this section?

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GDQ15. What are your views on the proposed set of Workload Activities for the Tier 1 mains replacement PCD?

GDQ17. What are your views on our proposed approach to setting unit costs for the Tier 1 mains replacement PCD?

GDQ18. What are your views on our proposed Allowance Adjustment Mechanism and Allowance Adjustment Restrictions for the Tier 1 mains replacement PCD?

GDQ19. What are your views on our proposed Workload Activities for the Tier 1 services PCD?

GDQ20. What are your views on our proposed approach to setting unit costs for the Tier 1 services PCD?

GDQ21. What are your views on our proposed Allowance Adjustment Mechanism and Allowance Adjustment Restrictions for the Tier 1 services PCD?

GDQ22. What are your views on our proposal for a common PCD for capital investments?

GDQ23. What are your views on our proposals for delivery, clawback and deliverables for the capital projects PCD?

GDQ24. Do you agree with our approach for funding physical security for the GD sector? And do you agree that in light of the proposed baseline totex that the physical security PCD is no longer required for the GD sector?

GDQ25. Do you consider that the enhanced obligations framework for exit capacity and the additional information being sought are appropriate?

Approach to Cost Assessment Consultation Questions

GDQ26. Do you agree with our proposal of using a top-down regression model?

GDQ27. Do you agree with our proposed approach to benchmarking modelled costs at the 85th percentile?

GDQ28. Do you agree with our proposed approach to estimating embedded ongoing efficiency and values calculated?

Normalisation Consultation Questions

GDQ29. Do you agree with our proposed pre-modelling normalisations?

Model Selection Consultation Questions

GDQ30. Do you agree with the selected aggregation level, estimation technique and time period for our econometric modelling?

GDQ31. Do you believe we should take into consideration revised cost information for the remainder of GD1 including 2019-20 (actuals) and 2020-21 (forecast)?

Opex Consultation Questions

GDQ32. Do you agree with our selected cost drivers for Opex?

GDQ33. What are your views on our proposed approach to the synthetic cost driver for repex?

GDQ34. What are your views on our proposed repex workload adjustments?

GDQ35. Where we have disallowed workloads, should we consider making corresponding adjustments to opex costs? If so, how do you think this could be done?

Capex Consultation Questions

GDQ36. What are your views on our proposed approach to the synthetic cost driver for capex?

GDQ37. What are your views on our proposed capex adjustments?

Non-regression Costs Consultation Question

GDQ38. Do you agree with our assessment of non-regression costs and our proposed adjustments?

Technically Assessed Costs Consultation Questions

GDQ39. Do you agree with areas selected for technical assessment?

GDQ40. Do you agree with our proposed approach?

Technically Assessed Costs Consultation Questions

GDQ41. Do you agree with our proposed disaggregation methodology?

Uncertainty Mechanisms consultation questions

GDQ42. Do you have any views on our common UMs that haven't been covered through any of the specific consultation questions set out elsewhere in this chapter? If so, please set them out, making clear which output you are referring to.

GDQ43. What are your views on the proposed re-opener for Tier 1 stubs?

GDQ44. What are your views on our proposal to introduce a <7bar diversions re-opener?

GDQ45. What are your views on the triggers and windows for the MOB's safety re-opener?

GDQ46. What are your views on our consultation position to address bespoke decarbonisation of heat re-openers through our proposed innovation stimulus, Net Zero and Heat Policy re-opener mechanisms?

GDQ47. What are your views on the questions set out in paragraph 4.57 of this document in relation to large hydrogen projects?

GDQ48. Do you have any other comments in relation to this section?

GDQ49. What are your views on our proposal to introduce a new domestic connections volume driver?

GDQ50. What are your views on our proposal to continue with the large loads re-opener?

GDQ51. Do you agree with our definition of a 'large load' to use for this re-opener?

GDQ52. Do you agree with our proposal to continue with a smart meter rollout re-opener?

GDQ53. Do you agree with our proposal to continue with a common streetworks re-opener?

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