

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject:

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

1. Insufficient justification for additional cost recovery

The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

2. Weak incentives for efficient project management

Allowing additional expenditure to be recovered through the Change in Scope mechanism risks reducing incentives for cost discipline. Regulated re-openers should be used sparingly and only where there is compelling evidence that the expenditure is necessary, efficient, and unavoidable. Otherwise, there is a danger that developers will face limited financial consequences for project delays, planning complications, or changes in project scope.

3. Consumer protection concerns

Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and public expenditure associated with carbon capture and storage projects, Ofgem should apply a particularly high threshold before approving additional costs. I do not believe the consultation demonstrates sufficient consumer benefit to justify the proposed amendments.

4. Regulatory precedent

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

5. Need for greater transparency

Before any approval is granted, Ofgem should publish more detailed information demonstrating:

- why the costs were unavoidable.
- what alternatives were considered.
- what proportion of the costs should reasonably be borne by the licensee.
- how consumers will benefit from the proposed expenditure; and
- how Ofgem has assessed value for money.

For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

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From: [REDACTED]

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[Start a petition](#)

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[URGENT WE NEED YOUR HELP CLOSING DATE TODAY 15th JUNE - TEMPLATE
OBJECTION EMAIL PROVIDED](#)

[Defend Wirrals Green Spaces
Moreton, ENG, United Kingdom](#)

[15 Jun 2026](#)

[Dear Supporters - this will take just a few minute of your time....](#)

[URGENT – WE NEED YOUR HELP- DEADLINE FOR OBJECTIONS TODAY MON 15th JUNE
THIS SHOWS HOW CCS PROJECT COSTS CAN SPIRAL AND WE, THE PUBLIC, ARE
ASKED TO PICK UP THE BILL.](#)

The Hynet CO2 Pipeline Project / Liverpool Bay CCS Ltd have applied to OFGEM to recover nearly £1million of costs to be paid to them because a proposed HYNET pipeline spur to Runcorn's Viridor Waste Plant was cancelled.

Liverpool Bay CCS Ltd are looking to recover costs associated with them taking part in Runcorn's TCPA (Town and Country Planning Act) Masterplan consultations and also consultations relating to a solar farm planning application / DCO (development consent order) – the Cubico solar farm is planned for Ince Marshes in Frodsham.

They are looking to recover £926,437 - not for actually building anything, this is simply what could be termed "consultancy costs" for taking part in some planning applications and engagement with Viridor, Cubico and the Department of Energy Security and Net Zero (DESNZ)

So, Liverpool Bay CCS Ltd is asking Ofgem to fund a “Change in Scope Reopener” essentially saying that circumstances have changed since their original funding package and they wish to recover these further costs.

OFGEM is consulting on whether these costs are justified before making a final decision.

This highlights how assumptions underpinning CCS projects can evolve after initial approvals and funding arrangements have been agreed. It suggests that private companies may face limited financial consequences for inadequate upfront planning, as they can subsequently seek to have additional costs covered by OFGEM.

IF OFGEM APPROVE THESE ADDITIONAL COSTS OF NEARLY £1MILLION THE COSTS WILL ULTIMATELY BE PASSED ON TO US THE ENERGY CONSUMERS

If you wish to comment on the application to OFGEM please do so urgently, as the closing date is today 15th June.

A template email is suggested below, simply copy and paste or send your own email:

Email to: ccus@ofgem.gov.uk

Dear Sir/Madam,

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Thank you for considering my response.

Yours faithfully,

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[REDACTED]

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To: ccus@ofgem.gov.uk

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[REDACTED]

[REDACTED]

[REDACTED]



From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Carbon capture and storage

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Thank you for considering my response.

Yours faithfully

[Redacted signature block]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: CCS Ltd

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: CCUS

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Dear Sir/Madam,

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application, which would allow recovery of additional costs associated with the Runcorn TCPA Application and the Cubico Frodsham Solar Project Development Consent Order examination.

I recognise the importance of the UK's decarbonisation objectives and the role of carbon capture and storage infrastructure. However, I do not believe the proposed cost recovery strikes an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

1. Insufficient justification for additional cost recovery

It is unclear whether the costs arising from these changes in project circumstances could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that they are genuinely exceptional and outside Liverpool Bay CCS Ltd's control, consumers should not be expected to bear them.

2. Weak incentives for efficient project management

Allowing additional expenditure to be recovered through the Change in Scope mechanism risks undermining incentives for cost discipline. Regulated re-openers should be used sparingly, and only where there is compelling evidence that expenditure is necessary, efficient, and unavoidable. Routine approval risks leaving developers with limited financial consequences for delays, planning complications, or scope changes.

3. Consumer protection

Any increase in regulated allowances may ultimately be passed on to network users and consumers. Given ongoing concerns about energy affordability and the public costs associated with CCS projects, Ofgem should apply a high threshold before approving

additional expenditure. The consultation does not, in my view, demonstrate sufficient consumer benefit to justify the proposed amendments.

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Approving this application risks establishing a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or scope adjustments become routinely recoverable, allowable expenditure may expand progressively without corresponding accountability.

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Before any approval is granted, Ofgem should publish more detailed information addressing:

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form, or at a minimum require a more rigorous demonstration that the expenditure is efficient, necessary, and in consumers' interests before permitting recovery through the regulatory framework.

Yours faithfully,

Warmly,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent on: Tuesday, June 16, 2026 [REDACTED]
To: Ccus@ofgem.gov.uk
Subject: Consultation - Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Limited

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Dear Sir, Madam,

I only today read about the consultation regarding Ofgem minded to approve Liverpool Bay's application to be refunded costs, where the original agreed application has changed.

I understand that measures need to be taken in this area, but there has to be some risk taken by the Developers against the costs involved and I think if this application is approved by OFGEM, there will be many other similar schemes and the burden of financial cost will fall to the Bill Payer by an increase in their Bills again.

I believe Ofgem should show details of:

Why the costs were unavoidable ?

What other alternatives were considered?

What proportion of costs should be borne by the Licensee?

How the consumers will benefit from the proposed expenditure?

How has Ofgem assessed value for money with this scheme?

For these reasons I would ask that Ofgem reject these proposals as they stand and require far more detailed assessment to show that they are necessary and in the interests of consumers before allowing recovery.

Thank you for reading this,

Yours faithfully

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Consultation Phase 2 Objection

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Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

I fear this will set a disturbing precedent for future projects. Thank you for considering my response.

Yours faithfully

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Consultation Response – Objection Liverpool Bay CCS Ltd Change in Scope Application

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Dear Sir/Madam,

Re: Consultation Response – Liverpool Bay CCS Ltd Change in Scope Application

I am writing to object to Ofgem's proposed approval of Liverpool Bay CCS Ltd's application to recover additional costs associated with the Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I appreciate the importance of reducing carbon emissions and recognise that carbon capture and storage technology may have a role in future energy policy, I do not believe that consumers should be expected to absorb further costs arising from project changes and planning complications without much stronger justification.

My concerns are both financial and environmental.

Firstly, major infrastructure projects of this scale inevitably encounter planning challenges, regulatory hurdles, and stakeholder objections. These are normal development risks and should be accounted for by developers from the outset. The consultation does not provide sufficient evidence that the costs being claimed are exceptional, unavoidable, or beyond the reasonable control of Liverpool Bay CCS Ltd.

Secondly, I am concerned about the precedent that approval of this application could set. If developers are able to recover additional expenditure whenever project circumstances change, there is a risk that cost overruns become increasingly normalised and consumers are left carrying the financial burden. At a time when many households are already struggling with the cost of living and energy bills remain a significant concern, Ofgem should exercise extreme caution before approving any increase in recoverable costs.

In addition, I believe it is important to consider the wider public interest. Communities across Cheshire, the Wirral, North Wales and the Dee Estuary region are already facing

the prospect of substantial industrial development associated with CCS infrastructure. Many residents have expressed concerns regarding the cumulative impact on the landscape, local environment, wildlife habitats, and the character of coastal and rural areas.

The Dee Estuary is an internationally important habitat supporting protected bird species and other wildlife. Given the environmental sensitivity of the area, it is essential that all associated developments are subject to the highest levels of scrutiny. Public confidence in these projects is unlikely to be strengthened if developers are repeatedly allowed to seek additional funding through regulatory mechanisms while local communities continue to shoulder the environmental and visual impacts.

I am also concerned that approving these additional costs may weaken incentives for efficient project management. Regulatory re-openers should remain exceptional measures rather than becoming a routine route for recovering expenditure arising from project changes or planning difficulties.

Before any approval is granted, I believe Ofgem should provide greater transparency regarding:

- why these costs could not reasonably have been anticipated;
- what steps were taken to minimise or avoid them;
- whether a proportion of the costs should be borne by the developer;
- how consumers will benefit from the expenditure; and
- how value for money has been assessed.

For these reasons, I urge Ofgem to reject the proposed cost recovery application or, at the very least, require significantly stronger evidence that the expenditure is necessary, efficient, unavoidable, and in the interests of consumers.

Thank you for considering my comments.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

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To: ccus@ofgem.gov.uk

Subject: Consultation Response

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,



From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Consultation..Phase 2 tranche C Draft Determination: Liverpool Bay CCS Ltd

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

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Thank you for considering my response.

Yours faithfully



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Consultation

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Thank you for considering my response.

Yours faithfully,

[Redacted signature block]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Don't want the pipeline never mind the additional costs

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Dear Sir/Madam,

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Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Escalating non-recoverable cost Peak cluster

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Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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As a Professor of Economics at a Russell Group University. My huge concern is that any project should not add more to cost than it does to benefit the below fills me with considerable dread that Costs have soared but benefits not so. The below I believe only scratch the surface of a considerable cost benefit imbalance

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

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To: ccus@ofgem.gov.uk

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[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject:

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[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject:

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Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent on: Tuesday, June 16, 2026 [REDACTED]
To: CCUS <CCUS@ofgem.gov.uk>
Subject: FW: Response to consultation-phase 2. Liverpool Bay CCS Ltd

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Sent from my Galaxy

----- Original message -----

From: [REDACTED]
Date: 15/06/2026 [REDACTED]
To: ccus@ofcom.gov.uk
Subject: Response to consultation-phase 2. Liverpool Bay CCS Ltd

Dear Sir/Madam,
Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

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Thank you for considering my response.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: CCUS <CCUS@ofgem.gov.uk>
Subject: Fwd: Response to Consultation – Phase 2 Tranche C Draft Determination:
Liverpool Bay CCS Ltd

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Sent from my iPad

Begin forwarded message:

From: [REDACTED]
Date: 15 June 2026 at [REDACTED]
To: ccus@ofgem.gov.uk
**Subject: Response to Consultation – Phase 2 Tranche C Draft Determination:
Liverpool Bay CCS Ltd**

Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to the proposal that Ofgem's approve Liverpool Bay CCS Ltd's Change in Scope re-opener application, to allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I appreciate the importance of achieving the UK's decarbonisation objectives, I believe the potential role of carbon capture and storage infrastructure has been amplified beyond what is realistic. I also believe that the proposed cost recovery represents an inappropriate balance for consumer protection and favours developer risk.

My concerns are as follows:

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The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely

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Thank you for considering my response.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Hynet expansion Phase 2 Tranche C

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Dear Sir

In accordance with public consultation re the above I wish to register my strong objections to the Phase 2.

We are already witnessing the devastating effects of Phase one on the wildlife and flora of the countryside. Roads have been left in a perilous state by wagons leaving mud and debris. Farming land has been destroyed with no compensation received by the landowners.

Carbon capture and storage is not the answer to climate change. It is unproven and far too expensive and allows polluters to continue to pollute with impunity. Emissions should be reduced at source and at the polluters' own expense.

The money set aside to bury emissions for future generations to deal with would be far better spent on renewables.

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Hynet

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Thank you for considering my response.

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[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: Liverpool bay

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Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: LIVERPOOL BAY CCS - CHANGE IN SCOPE

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Liverpool bay CCS

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To whom it may concern

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[Redacted signature block]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Liverpool Bay CCS Change of Scope

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Skip to main

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[Redacted signature block]

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To: ccus@ofgem.gov.uk

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[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: Liverpool Bay CCS Ltd Consultancy Costs

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[REDACTED]
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From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

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Subject: Liverpool bay

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To: ccus@ofgem.gov.uk

Subject: Objection

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
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[Redacted signature block]

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Dear Sir/Madam,

I object to Liverpool Bay CCS Limited's application to recover additional costs through the Change in Scope Re-opener process. I do not believe consumers should bear further costs arising from changes to the project unless there is compelling evidence that these costs were unavoidable and represent good value for money.

Given the substantial public support already provided to the project, any additional funding should be subject to the highest level of scrutiny. I therefore urge Ofgem to reject any unjustified cost increases. Sent from my iPhone

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: CCUS <CCUS@ofgem.gov.uk>
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[REDACTED]
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Yours faithfully,



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I recognise it's important to achieve the UK's decarbonisation objectives, and the potential role of carbon capture and storage infrastructure, however I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

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[Redacted signature]

[Redacted name]

[Redacted title]

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[REDACTED]

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From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Objection

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[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: CCUS <CCUS@ofgem.gov.uk>
Subject: Objection Liverpool Bay CCS

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[Redacted signature block]

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To: ccus@ofgem.gov.uk

Subject: OBJECTION PHASE 2 TRANCHE C DRAFT DETERMINATION:LIVERPOOL BAY CCS LTD

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To: ccus@ofgem.gov.uk

Subject: Objection -phase 2 Tranche C Draft Determination:Liverpool Bay CCS Ltd

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Objection to CCS LTD CHANGE IN SCOPE

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

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Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

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The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

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Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Objection to CCS Project

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[REDACTED]

From: [REDACTED]

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To: CCUS <CCUS@ofgem.gov.uk>

Subject: Objection to CCS Project

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[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Objection to Liverpool Bay CCS Ltd change in scope re-opener application

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While I recognise the importance of achieving the UK's decarbonisation objectives, I do not believe that the proposed cost recovery outlined above represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

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The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Objection to Liverpool Bay CCS Ltd's Change in Scope re-opener application

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Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

We are writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

Whilst we recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, we do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

Our concerns are:

1. Insufficient justification for additional cost recovery

The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

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Thank you for considering our response.

Yours faithfully,

[Redacted signature]

[Redacted signature]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Objection

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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Thank you for considering my response.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Peak Cluster - NOBODY VOTED FOR THIS...

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Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Peak Cluster & CCUS

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[Redacted signature block]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: Peak cluster objection

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Phase 2 Tranche C Draft Determination Liverpool Bay CCD

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[REDACTED]

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[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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I object to the above relating to Hynet.

This project is spiralling out of control at a considerable cost to us tax payers.

Why are tax payers funding this when it should be the companies that the carbon is captured from that foots the bill?

We have been lied to from the start, which was unpinned at the Peak Cluster consultation that CO2 will be imported from abroad at Tranmere.

Connah's Quay Power Station was supposed to be enhancing its capability to capture the solar and wind energy produced, but now it turns out it will become net zero by requesting to join Hynet! All LIES LIES LIES. And they will decimate salt marshes to do it.

There are fields north of Chester churned up for months and nothing happening. Land owners are not being compensated and now there are problems going under the canal at Pretty Bridge in Caughall and they've been trying to get under the M53 & 56 for nearly a year.

There is no transparency or accountability from Hynet because it's a Government project that will haemorrhage money. However, if it was a private funded project none of this would happen.

It will end up like HS2.

This company is so out of its depth, doesn't know what it's doing and squandering tax payers money.

How much has been spent already?

How much over budget is the project already?

The Government needs to pause, take a breath and actually look at how little has been done for the cost spent.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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To: ccus@ofgem.gov.uk

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From: [REDACTED]

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Subject: Phase 2 Tranche C Draft Determination Liverpool Bay CCS

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Hello,

I write in relation to information received suggesting that there is a proposal that wasted costs in the project linked to carbon capture being routed into Liverpool Bay should be paid out of public funds.

I am not sure what the justification for this would be, if a commercial enterprise is seeking to explore something and does not complete it, I cannot see why the public purse should pay.

Will there be an explanation as to why these costs which I am told are close to one million pounds were incurred before establishing they have been wasted.

A large element of the carbon capture proposals seem to receive little publicity officially, to incur a million pounds of costs on projects that do not seem to gain public prominence through official channels seems undemocratic.

I would object to this without further detail justifying it.

Kind regards

[REDACTED]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Phase 2 Tranche C Draft Determination

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[REDACTED]

From: [REDACTED]
Sent on: Tuesday, June 16, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: Phase 2 tranche c draft determination-objection

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Email to: ccus@ofgem.gov.uk

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Subject: Re: Response to Consultation- Phase 2 Tranche C Draft Determination:
Liverpool Bay CCS Ltd

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From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Re:objection to Liverpool Bay CCS Ltd asking Ofgem to fund a “Change in Scope Reopener”

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From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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From: [REDACTED]

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Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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Thank you for considering my response. Please reject this nonsense!

Yours faithfully,

[REDACTED]
[REDACTED]

[REDACTED]

Thank you for your support

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

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[REDACTED]

From: [REDACTED]
Sent on: Monday, June 15, 2026 [REDACTED]
To: ccus@ofgem.gov.uk
Subject: Response to Consultation – Phase 2 Tranche C Draft Determination:
Liverpool Bay CCS Ltd

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To whom it may concern

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[Redacted signature block]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

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Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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[Redacted signature]

[Redacted contact information]

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[REDACTED]

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From: [REDACTED]
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Costs of nearly £1million for simply taking part in some planning consultations and engaging with Viridor Cubico and DESNZ seem excessive and I object to these being simply passed on to energy customers.

There needs to be proper scrutiny of what these costs relate to and why were they unforeseen when initial funding was approved.

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

Energy costs are already high enough without costs associated with CCS adding more costs to be added to consumers

Yours faithfully

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

1. Insufficient justification for additional cost recovery

The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it remains unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk.

Planning processes, consenting requirements, and stakeholder engagement are inherent aspects of major infrastructure development. Without clear evidence that these costs are genuinely exceptional, unavoidable, and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

2. Weak incentives for efficient project management

Allowing additional expenditure to be recovered through the Change in Scope mechanism risks weakening incentives for cost discipline and efficient project delivery.

Regulated re-openers should be used sparingly and only where there is compelling evidence that the expenditure is necessary, efficient, and unavoidable. Otherwise, there is a danger that developers face limited financial consequences for project delays, planning complications, or changes in project scope.

3. Consumer protection concerns

Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and the substantial levels of public financial support already committed to CCS infrastructure, Ofgem should apply a particularly high threshold before approving additional recoverable costs.

I do not believe the consultation demonstrates sufficient direct consumer benefit to justify the proposed amendments.

4. Regulatory precedent

Approval of this application may establish a concerning precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, consenting complications, or project scope adjustments become routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability or meaningful transfer of risk to developers.

5. Need for greater transparency

Before any approval is granted, Ofgem should publish more detailed information demonstrating:

- why the costs were unavoidable;
- what alternatives were considered;
- what proportion of the costs should reasonably be borne by the licensee;
- how consumers will benefit from the proposed expenditure; and
- how Ofgem has assessed value for money and consumer protection obligations.

For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a far more rigorous demonstration that the expenditure is efficient, necessary, proportionate, and genuinely in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

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[Redacted signature block]

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Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and public expenditure associated with carbon capture and storage projects, Ofgem should apply a particularly high threshold before approving additional costs. I do not believe the consultation demonstrates sufficient consumer benefit to justify the proposed amendments.

4. Regulatory precedent

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability. In particular the Peak Cluster project, which is facing huge opposition from residents on the Wirral and beyond because of its intention to destroy local environments and wildlife habitats, and fundamentally alter the nature of our homes.

5. Need for greater transparency

Before any approval is granted, Ofgem should publish more detailed information demonstrating:

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

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[Redacted]

[Redacted]

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From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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[Redacted name]

[Redacted title]

[Redacted address line 1]

[Redacted address line 2]

[Redacted address line 3]

[Redacted contact information]

From: [REDACTED]

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Allowing additional expenditure to be recovered through the Change in Scope mechanism risks reducing incentives for cost discipline. Regulated re-openers should be used sparingly and only where there is compelling evidence that the expenditure is necessary, efficient, and unavoidable. Otherwise, there is a danger that developers will face limited financial consequences for project delays, planning complications, or changes in project scope.

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Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and public expenditure associated with carbon capture and storage projects, Ofgem should apply a particularly high threshold before approving additional costs. I do not believe the consultation demonstrates sufficient consumer benefit to justify the proposed amendments.

4. Regulatory precedent

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

5. Need for greater transparency

Before any approval is granted, Ofgem should publish more detailed information demonstrating:

- why the costs were unavoidable;
- what alternatives were considered;
- what proportion of the costs should reasonably be borne by the licensee;
- how consumers will benefit from the proposed expenditure; and
- how Ofgem has assessed value for money.

For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[Name]

[Address]

From: [REDACTED]

Sent on: Tuesday, June 16, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Response to consultation

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

1. Insufficient justification for additional cost recovery

The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

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Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Response to Phase 2 Tranche C

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

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Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]
[REDACTED]

Thank you for your support

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Response to Phase consultation Tranche C Draft determination:Liverpool Bay CCS Ltd

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Email to: ccus@ofgem.gov.uk

Dear Sir/Madam,

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

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face limited financial consequences for project delays, planning complications, or changes in project scope.

1. Consumer protection concerns

Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and public expenditure associated with carbon capture and storage projects, Ofgem should apply a particularly high threshold before approving additional costs. I do not believe the consultation demonstrates sufficient consumer benefit to justify the proposed amendments.

1. Regulatory precedent

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

1. Need for greater transparency

Before any approval is granted, Ofgem should publish more detailed information demonstrating:

- why the costs were unavoidable;
- what alternatives were considered;
- what proportion of the costs should reasonably be borne by the licensee;
- how consumers will benefit from the proposed expenditure; and
- how Ofgem has assessed value for money.

For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Subject: Escalating non-recoverable cost Peak cluster

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order Examination.

I understand the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure but I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

I have following concerns:

1. Insufficient justification for additional cost recovery

The consultation proposes that costs arising from changes in project circumstances be recovered through the regulated framework. However, it is unclear whether these costs could reasonably have been anticipated and managed by the licensee as part of normal project development risk. Without clear evidence that these costs are genuinely exceptional and outside the control of Liverpool Bay CCS Ltd, consumers should not be expected to bear them.

2. Weak incentives for efficient project management

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3. Consumer protection concerns

Any increase in regulated allowances may ultimately be borne by network users and consumers. Given ongoing concerns regarding energy affordability and public expenditure associated with carbon capture and storage projects, Ofgem should apply a particularly high threshold before approving additional costs. I do not believe the consultation demonstrates sufficient consumer benefit to justify the proposed amendments.

4. Regulatory precedent

Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

5. Need for greater transparency

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- why the costs were unavoidable;
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- how consumers will benefit from the proposed expenditure; and
- how Ofgem has assessed value for money.

For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

I sincerely hope you take my concerns seriously.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: The Hynet CO2 Pipeline Project / Liverpool Bay CCS Ltd

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

While I recognise the importance of achieving the UK's decarbonisation objectives and the potential role of carbon capture and storage infrastructure, I do not believe that the proposed cost recovery represents an appropriate balance between consumer protection and developer risk.

My concerns are as follows:

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Thank you for considering my response.

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: The Hynet CO2 Pipeline Project / Liverpool Bay CCS Ltd

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Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

I am writing to object to Ofgem's minded-to position to approve Liverpool Bay CCS Ltd's Change in Scope re-opener application and allow recovery of additional costs associated with the ongoing Runcorn TCPA Application and participation in the Cubico Frodsham Solar Project Development Consent Order examination.

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For these reasons, I urge Ofgem to reject the proposed modifications in their current form or, at a minimum, require a more rigorous demonstration that the expenditure is efficient, necessary, and in the interests of consumers before allowing recovery through the regulatory framework.

Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: CCUS <CCUS@ofgem.gov.uk>

Subject: URGENT - YOUR ACTION REQUIRED - Objection to Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

L.S,

I strongly object to Ofgem's proposal to award Liverpool Bay CCS Ltd a further £1.8 million allowance for the so-called Runcorn Spurline Development Activities.

The documents establish the central facts clearly:

Viridor is now a standby project.

Viridor was the only user requiring the Runcorn Spurline.

The spurline is no longer part of DESNZ's current approved network configuration.

Liverpool Bay CCS Ltd is no longer obliged to construct it.

Those facts should bring this expenditure to an end. They should not be used to create a new category of recoverable costs designed to keep a commercially unsupported project alive in case government policy changes again.

Question 1

I agree that the Change in Scope has occurred and that Phase 2 Tranche C must be removed from the Approved Transport and Storage Network.

This follows directly from the removal of its only identified user from the priority configuration.

Question 2

I support the removal of Phase 2 Tranche C from the relevant project documents, obligations and allowances.

I do not support amendments that replace the cancelled development scope with another publicly funded mechanism for preserving the same project.

Removing a project while continuing to fund its planning, stakeholder engagement and regulatory position is not a clean removal. It is a holding arrangement intended to facilitate its future resurrection.

Question 3

No. The proposed £1.8 million allowance should be rejected.

Ofgem expressly states that this consultation does not represent a position on the value for money of the Runcorn Spurline or Viridor as a network user. Ofgem cannot reasonably avoid the value-for-money question while simultaneously declaring that further expenditure on the project is economic and efficient.

The stated justification is largely hypothetical. Ofgem argues that continued spending might reduce costs if Viridor is reprioritised at some unknown future date. That is speculation, not a present economic requirement.

A regulated company should not receive further allowances merely to retain optionality around a project with no current priority user, no construction obligation and no confirmed future.

It is also unacceptable that Ofgem has accepted personnel costs based on an international operating model containing additional expatriate fees. The suggestion that this enables rapid deployment is unconvincing when the substantive project has been suspended and the remaining work consists principally of planning and engagement activity.

The original application of a flat 30% contingency across all workstreams is another warning sign. Ofgem itself describes this as inconsistent with efficient cost assessment and as risking inefficiency within the regulated asset base. Reducing the contingency to 10% does not resolve the underlying problem. The question is not merely whether the contingency is too large. It is whether these activities should continue to be publicly supported at all.

The answer is no.

Question 4

I object to formalising licence modifications that preserve the applications, consents, rights, documentation and other assets for the purpose of facilitating a future revival of the spurline.

Ofgem's direction would require Liverpool Bay CCS Ltd to maintain the utility and continuing availability of work associated with a project that is no longer justified within the approved network.

This transfers the cost and risk of preserving a private commercial option away from the project participants and into the regulated framework.

Where a project no longer has a priority user, the commercial parties seeking to retain that option should fund it themselves.

Question 5

This determination risks establishing a damaging precedent.

A project can lose its only relevant user, be removed from the approved network and have its substantive development suspended, yet continue receiving regulated allowances to protect its planning position against a possible future policy reversal.

That is not disciplined infrastructure regulation. It is public underwriting of speculative development.

The documents also fail to provide the public with sufficient transparent detail to test the proposed expenditure properly. The published table aggregates the costs of the planning application, DCO participation, engagement with Viridor and responses to DESNZ. It does not give a sufficiently granular public breakdown of personnel, consultancy, legal, planning and other costs.

Ofgem should not approve expenditure that the public cannot meaningfully scrutinise.

The appropriate determination is straightforward:

1. Remove Phase 2 Tranche C from the Approved Transport and Storage Network.
2. Remove the associated construction and development allowances.
3. Refuse the proposed £1.8 million Runcorn Spurline Development Activities allowance.
4. Require any further preservation or progression work to be financed by Liverpool Bay CCS Ltd, Viridor or other interested commercial parties.
5. Permit a fresh application only if a genuine priority user, a defined need and a robust value-for-money case emerge.

The public should not be required to keep paying to preserve a pipeline project that currently has no priority user and no obligation to be built.

This allowance should be refused.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Urgent Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

I object to the proposed approvals and expenditure associated with the Liverpool Bay CCS Ltd Phase 2 Tranche C Draft Determination.

A central concern is whether the project now being advanced remains materially consistent with the integrated scheme originally presented to Government, the Planning Inspectorate, stakeholders, and the public. The HyNet project was promoted and assessed as a coordinated regional decarbonisation scheme comprising:

- a CO₂ transport and storage network; and
- a hydrogen production and hydrogen distribution network operating as interconnected strategic infrastructure.

The Development Consent Order for the CO₂ pipeline was granted in March 2024 within the context of this integrated vision and associated public-interest justification. The stated strategic benefits included industrial decarbonisation, hydrogen deployment, regional economic transformation, and broader system integration across the North West.

However, the hydrogen distribution pipeline — a key component underpinning the original need case — has reportedly been paused by Cadent Gas Ltd due to the absence of a finalised Hydrogen Transport Business Model. No Development Consent Order application has been submitted for this infrastructure, and no confirmed timetable for delivery appears to exist. This raises a significant question as to whether the infrastructure currently proceeding is materially different from the scheme upon which public subsidy, regulatory support, and planning consent were originally justified.

In particular, it is unclear:

- whether the CO₂ transport and storage infrastructure continues to deliver the scale of public benefit originally claimed in the absence of the hydrogen network;

- whether updated cost-benefit and value-for-money assessments have been undertaken to reflect these altered circumstances;
- whether the carbon reduction assumptions and industrial integration benefits remain achievable;
- and whether consumers and taxpayers are now being exposed to disproportionate financial risk for infrastructure whose originally stated strategic function may no longer be deliverable in full.

There is also concern that proceeding incrementally with elements of the scheme despite uncertainty surrounding the wider hydrogen infrastructure risks creating a form of project segmentation or “salami slicing,” whereby individual components continue to advance and secure funding despite the integrated overall scheme materially changing from that originally assessed.

Members of the public and affected communities were consulted on an integrated HyNet proposition. If major linked components are now delayed indefinitely, substantially altered, or potentially abandoned, there is a legitimate concern that the basis upon which public consultation and planning consideration occurred has materially shifted.

Given these circumstances, Ofgem should:

- reassess whether the current project remains substantially consistent with the original public-interest and strategic justification;
- require updated and independently scrutinised value-for-money analysis;
- publish revised assumptions regarding carbon savings, industrial demand, utilisation rates, and long-term public cost exposure;
- consider whether continued approvals risk committing consumers and taxpayers to infrastructure whose integrated benefits may no longer materialise as originally presented;
- and pause approval of further expenditure until the status, viability, and timetable of the hydrogen infrastructure are clarified.

In the absence of such reassessment and transparency, approving additional expenditure appears premature and inconsistent with principles of good regulatory governance, public accountability, and prudent stewardship of public funds.

Regards



From: [REDACTED]

Sent on: Monday, June 15, 2026 [REDACTED]

To: ccus@ofgem.gov.uk

Subject: Wirral

Important: This email has been sent from outside Ofgem. Be careful when opening attachments or clicking on links. Do not open attachments if you do not know what they are. If you're worried about an email, use the Report Message button.

Dear Sir/Madam,

Response to Consultation – Phase 2 Tranche C Draft Determination: Liverpool Bay CCS Ltd

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Approval of this application may establish a precedent for future Change in Scope submissions across the CCS sector. If costs linked to planning processes, stakeholder engagement, or project scope adjustments are routinely recoverable, there is a risk of progressive expansion of allowable expenditure without corresponding accountability.

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Thank you for considering my response.

Yours faithfully,

[REDACTED]

[REDACTED]