

CoGDEM (Council of Gas Detection and Environmental Monitoring) should like to submit the following comments on RIIO-GD1. Our area of focus on the consultation document has solely been with the carbon monoxide issues in section 5 paragraphs 5.23 to 5.31 on pages 38 and 39, and we would like to answer questions 4, 5 and 6 from that section. We are pleased to have been involved with the CO working group run by James Veaney, Steve Brown and Lia Santis, so this email has also been copied to them, as it confirms the points that have been made verbally during meetings of that group.

Question 4: Is it appropriate to fund GDNs through the price control for their activities in relation to reducing risks of CO poisoning?

Yes, without doubt the GDNs have the opportunity to address consumers in ways that are not available to other bodies, so communications about carbon monoxide are vital. The costs of their various initiatives will vary, for example the distribution of a printed leaflet is relatively cheap, but the distribution of free CO alarms to vulnerable consumers will be more costly, especially if delivered and installed by the FCO. We would not expect the GDNs to undertake such widespread initiatives unless they knew up-front that they will be reimbursed, rather than hoping to be successful with retrospective applications through the Discretionary Reward Scheme.

We were disappointed that the opportunity to fund CO initiatives in 2010 under the previous Price Control Review was not taken, especially as the GDNs (and ENA) had put significant effort into proposing worthwhile initiatives, under the mistaken impression that funding would not be a hurdle.

Question 5: Are there any identifiable output targets that could be associated with reducing CO poisoning risks?

Measuring the success of CO initiatives is always difficult, but the CO-Be Alarmed campaign has been undertaking street surveys for several years to identify trends in awareness and CO alarm population. If the GDNs undertake the suggested CO initiatives, we can expect the trends to show an accelerated upward movement. But even though you can take a horse to water, you cannot make it drink, so if the consumer decides not to take the advice given by the GDN, this should not be regarded as a failure by the GDN. Therefore, we feel that the measurement of the GDNs efforts to 'take the horse to water' is a valid output, so the following data would be useful:

- The number of homes/consumers which have been issued with a CO leaflet (the existing ENA leaflet is fine)
- The number of vulnerable customers who were not protected before the initiative who have subsequently been issued with CO alarms
- The number of home visits which were conducted by an FCO with a CO detector, giving an indication that the air was clear while the FCO was in attendance
- The number of cases of unexpected CO incidents which were found by the FCO's CO monitor (Scotia has indicated that their Personal Atmosphere Monitors (PAMs) find 1 unexpected CO incident per week on average, alongside the cases where they know CO is expected)
- The number of calls to the ESP as a result of a CO alarm activation, thereby allowing a response before serious illness or injury occurs?

Question 6: Are there any other social issues for which we should be setting outputs?

Although the size of the problem is relatively low, the CoGDEM helpline receives perhaps 25 calls per year from consumers (or their relatives/carers) who have lost their sense of smell and have been unable to smell gas when cookers or other appliances are left unlit, or gas leaks from outside the property have entered. Inevitably, such calls result in the recommendation to purchase a natural gas leak alarm (around £60-£70), but these are not available from either the GDN or the gas retailer. Perhaps it could be considered that such vulnerable customers should have access to subsidised gas leak alarms from the GDNs?