

Question 1: Do you agree with our proposal to require GDNs to report the capacity of bio-methane connected as a broad measure of environmental impact but not to adopt an associated financial reward/penalty?

I think this is meant to embarrass the GDN's into reducing costs and red tape for connecting renewable gas like that from AD plants and enable our country to reduce its dependency on imported carbon based gas sources.

First, ask ten people on the street to name 2 GNOs and you will receive a blank stare. Virtually nobody knows a GNO from an UFO.

Second, embarrassing a corporate entity is not possible. The bottom line is profit and dividends full stop. Large profits ensure large bonuses to directors, corporate growth and healthy returns to investors. Even embarrassing individuals in a corporate entity is useless, as we have seen in the banking industry. Would you mind if your face was printed on the front page of the Financial Times, as CEO of the poorest performing bio-methane connecting GNO, as long as your £1million bonus check comes through on time.

My answer is no, I do not agree with this proposition; it is simplistic and not unlike the other weak incentives we have in place that keep England at or near the bottom of the league in energy independence.

Question 2: Is there any other measure of environmental impact which you believe could be financially incentivised, bearing in mind the need for an output to be measurable and controllable by the GDNs?

Yes, the total cubic meters of bio-gas injected into the GNO's network and ranked against the other GNO's. If the financial incentive to be 1st, 2nd, and 3rd in the rankings were high enough, GNO's would be calling me the developer and asking me to please develop bio-methane in their district. Can you imagine a more successful outcome than this?

Question 3: We would welcome respondents' views on the expected take-up of biomethane following the introduction of the Renewable Heat Incentive (RHI).

In the context of how many more than the current two, would connect to the gas grid as a result of an RHI at or near a rate of the estimated £0.05? I would anticipate zero more connections. The proposed RHI will make no one rich and comes nowhere near the cost of current grid compliance and connection costs.

Question 4: Are there any wider-network benefits associated with bio-methane which might imply that we need to change the current connection charging boundary?

Benefits to the gas network? I cannot name one benefit to the network; Bio-methane injection has no "benefit" to a network of pipes or the companies who own them, as far as I can tell.

Question 5: We would welcome respondents' views on our proposed approach not to recover connection and downstream asset costs through general network charges. In particular, we would like to hear views on the potential rationale for socialising the costs of connecting bio-methane plant, and how we might be able to do this within our vires.

Are OFGEM really asking me to tell them that the whole of English society benefits from national energy security, less methane blowing off into the atmosphere from sources like cattle, pig and

chicken manure and price protection against inevitable increases in carbon based gas due to future shortages?

How can OFGEM do this within their vis? I have no idea what power OFGEM have to make rules around bio-methane connections to the national grid or the GNO's network. Maybe OFGEM should list its ability to govern the GNO's or not and then I could help.

Question 6: Do you agree with our proposed approach of logging-up costs associated with bio-methane connections in the event that the connection boundary changes?

NO Opinion

Question 7: Are there other issues we should be considering for the price control in relation to distributed gas (predominately bio-methane)?

I don't know

Question 8: What information would distributed gas users find useful to help them connect?

The question has no relevance until it becomes economically and technically possible to connect. As a potential bio-methane producer, I don't need to know any further information until it has been made affordable and technically reasonable to connect.

Question 9: Do you agree with our proposal to broadly continue with the shrinkage allowance mechanism and Environmental Emissions Incentive (EEI) adopted at GDP1?

I don't know

Question 10: Do you agree with our proposed change to the valuation of carbon for the EEI to bring it in line with DECC's recommended approach?

I don't know

Question 11: Should we retain a cap and collar on the EEI and at what level should any cap and collar be set? Should we introduce a cap and collar on the shrinkage incentive mechanism, and if so, at what level should any cap and collar be set?

I don't know

Question 12: Do you agree with our proposal not to adopt a rolling-incentive mechanism for the EEI mechanism?

I don't know

Question 13: Do you agree with our proposal to require GDNs to report actual shrinkage data when the relevant data becomes available, with the intention that we will use actual shrinkage as the basis for the shrinkage allowance and EEI at future reviews?

I don't know

Question 14: Do you agree with our proposals to require GDNs to establish a code of practice outlining how they will identify and process unregistered sites? Do you agree with our proposals to require GDNs to report annually on the number of unregistered

sites they have processed?

I don't know

Question 15: Do you agree with our proposal to publish companies' business carbon footprint (BCF) as a league table to provide reputational incentives but not to provide an associated financial penalty/reward?

Welcome to the 1970's. OFGEM cannot "embarrass" this problem away. Fast action on intelligent legislation is our only hope. Questions like this are very worrisome; a simple minded approach to embarrass companies that the general public don't even know or care about, into behaviour that will enable a reduction in imported energy is downright dangerous.

People and companies must be fiscally motivated into behaviour that goes against their immediate interest. Unfortunately, paying a higher cost to become energy independent and improve our natural environment requires behaviour changes that will not be "embarrassed" into corporations.

Question 16: Do you agree with our proposals to publish other emissions and resource use but not to apply financial rewards/penalties?

Simple minded; no one knows or cares what or who a GNO is and whether or not they use fewer resources than their competitor. The executives of the GNO's could care less as long as their bonus checks are big and arrive on time and their company is growing.

No, I do not agree with OFGEM's proposal. Without financial incentives everyone is wasting their time.