

Attention: James Grayburn, James Veaney, Steve Brown – Ofgem

CoGDEM response to carbon monoxide-related sections of the four GDN business plan submissions for RIIO-GD1

As in previous submissions to Ofgem, CoGDEM needs to point out that it has a narrow focus when reviewing the GDNs' business plan submissions for RIIO-GD1, we just look at the sections related to carbon monoxide awareness and incidents.

Having been part of the Ofgem CSI Working Group, our overall view of the submissions is that the efforts that the individual GDNs went to during the WG's lifetime (pilot studies of CO alarm distribution to the vulnerable, awareness campaigns, testing of FCO's protective gas detectors etc) have not been sufficiently and consistently reflected in these business plans. However, there are occasional nuggets of good news:

- Scotia mentions the Ofgem WG, and their pioneering use of PAMs to protect their field workers
- Wales and West will be following Scotia's lead on FCO's instruments
- Northern responds that their stakeholders wish them to do more

A key disappointment is that there is such little consistency between the approaches of the four companies, something which we had hoped would result from the involvement of their trade association ENA. We hope that Ofgem will inform the four companies (and ENA) that where safety is concerned, they should be working together to produce a consistent nationwide policy. Part of this consistency should be the provision of CO alarms to the vulnerable, which was such a central part of the pilot schemes undertaken over the last 18 months, but which hardly features in their future plans.

Three of the four companies claim that their stakeholders do not want them to increase their CO awareness activities, yet Northern is alone in saying they will respond positively to their stakeholders' desire to see them do more. This leads us to wonder what questions the stakeholders were asked to answer in the four regions.

Some individual comments to the four submissions are made below, in each case the text in blue shows the key statements from that particular GDN:

National Grid

CoGDEM was particularly disappointed with National Grid's lacklustre approach, starting as it does with two very selective and defensive quotes which set the tone for their submission. It is surprising that they suggest the new approach of a visual safety check for their most vulnerable customers, but only when attending due to a report of a gas escape. Surely the FCO already does this as part of the existing procedures? The second paragraph below seems to indicate a change of heart from comments made during the CSIWG meetings, and even at some recent APPGSG events.

Carbon Monoxide Awareness - we will use the skills of our emergency workforce to raise awareness of the dangers of carbon monoxide. We will visit customers as part of our attendance to a report of a gas escape and, when standby resources are available, provide a proactive visual check of installation safety and carbon monoxide advice at premises of our most vulnerable customers.

However we received mixed views over developing a new role in Carbon Monoxide (CO) awareness. Our role in Carbon Monoxide (CO) awareness has now been tailored to dovetail with our emergency service provision at no extra cost to the customer, and our security spend has been reduced to ensure any spend will realise consumer benefits.

Scotia Gas Networks

CoGDEM still feels that Scotia has been more innovative and faster to respond than the other three GDNs, yet their submission is disappointing in one regard, stating that the provision of CO alarms to the vulnerable does not sufficiently raise awareness to meet their overall objectives. This may be the case, but we feel that the wider use of CO alarms in certain sections of the community will provide safety in cases where there will be no response to awareness-raising activities, no matter how high profile those activities are.

Carbon Monoxide Strategy

Each year Carbon Monoxide (CO) poisoning results in fatalities and serious injuries in homes, businesses and industrial premises. HSE statistics show that around 15 people die from CO poisoning each year across the UK. The All Party Parliamentary Gas Safety Group issued a report in October 2011 which concluded as part of its review that there is a real need to raise awareness of the dangers of CO amongst the general public. We agree. Increased public awareness of the dangers of CO could help reduce risk and the number of incidents. We have already implemented a number of initiatives and have also issued all our front line staff with Personal Activation Monitors (PAMs) which provide early warning where CO is detected in the atmosphere. Our stakeholders are very supportive of the work we have done to date. However, throughout all our discussions they told us they did not support an extended role for the GDNs regarding CO, but they would like us to do more to raise awareness. As such our Business Plan sets out our proposals for an incentive mechanism so that GDNs can develop and implement targeted awareness campaigns that include giving advice when attending emergency calls, providing metering services, connections work etc.

Wales and West

CoGDEM is impressed by the rigour with which WWU analysed the results of Scotia's trial of CO instruments for field workers, and has decided to equip their FCOs with similar (yet different) technology.

Carbon monoxide – we propose to equip all our emergency engineers with personal carbon monoxide monitors to identify when they, or the consumer being visited, are at risk. We will back this up with post visit support where carbon monoxide is indicated at worrying levels, to make sure that the consumer is aware of the risk and the mitigating action. We will also carry on with our awareness programme with vulnerable groups.

Northern Gas Networks

CoGDEM supports NGN's idea of extending the capabilities of their existing gas leak detectors to include CO sensors, and we note their stakeholders' different views on increasing their CO awareness activities, despite the apparently contrary views of the other three GDNs' stakeholders.

Carbon monoxide - We plan to continue to play an active role in raising the awareness of the risks of CO. Our stakeholders have indicated very clearly that they believe we have a greater role to play in addressing the issue, including the distribution of information and advice and the provision of CO monitors to vulnerable customers when attending a gas emergency.

CoGDEM hopes that Ofgem finds these comments useful.

Regards

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