



Margret Coaster
Smarter Markets
9 Millbank
London
SW1P 3GE

12th October 2011

Ref: Tackling Gas Theft (112/11) – Consultation response and questions

Dear Margret,

I write on behalf of Gas Safe Register in response to Ofgem's for views on the above consultation. As you will appreciate as the Registrar we are not specifically or directly involved in the gas transportation and supply sectors of industry. We therefore feel we would be unable to provide an appropriately informed view on many of the areas you are seeking comment.

However, we would support any initiative that would reduce cost to industry and ultimately gas users and mechanisms to reduce the theft of gas can only be a good thing, particularly in terms of reducing gas safety risks associated with tampering with gas supplies etc.

The consultation questions which relate to safety are:

IA Question 10: Do you have any further information on safety incidents where harm has directly resulted from theft of gas.

IA Question 11: Do you consider that any of the proposals are likely to reduce the health and safety of any particular individuals?

IA Question 12: Which proposal do you consider will have the greatest overall benefit on health and safety?

From our very narrow perspective we would say no to questions 10 and 11.

In respect of question 12 our view is that all 3 proposals include an element of onsite work to determine if theft is taking place. Our submission is that regardless of the proposal taken forward the investigators of theft of gas must:

- Provide non technical staff with basic gas safety awareness training. For example how to turn the gas off on domestic and commercial gas meters, procedures to follow when a gas escape is suspected.
- The definition of any work on a gas supply is well defined within the requirements of the Gas Safety (Installation and Use) Regulations 1998. These require that any downstream gas work must be carried out by a Gas Safe Registered engineer with appropriate certificates of competence for the work being undertaken. This will include the ability to risk assess and relight appliances where appropriate.

I trust that the above comments are of assistance in Ofgem's considerations.

Yours sincerely, on behalf of Gas Safe Register

Mark Rolfe
Customer Service Director

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