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| Network Innovation Competition 2020 Supplementary Answer form | | |

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| Project Name | H100 Fife | | |
| Question number | #6 | Pro forma section | 8 |
| Question date | 20/08/20 | Answer date | 24/08/20 |
| Question summary | It is not clear what HSE approvals are required or have been secured to provide hydrogen gas to real homes. Please clarify the safety legislation required for this element of the project, with or without reference to the submission. | | |

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## Answer (please retain document formatting and do not exceed 2 pages unless otherwise agreed with Ofgem)

## Section 7 of our submission details our analysis of legislative and regulatory landscape in relation to H100 Fife, as detailed in 7.3 this was informed by a third-party legal review which is further detailed in Appendix O. Item 10 of Appendix O of our submission explains that consents such as Hazardous Substances (and related consents) have been considered and will be obtained in line with planning requirements.

Also explained within Section 7 is that the Safety Management framework (SMF) for the H100 Fife project does not require formal approval from the HSE, nor does it require exemptions from applicable legislation such as the Gas Safety (Management) Regulations (GS(M)R) as it is a new 100% hydrogen network and so falls outside the scope of, and doesn’t affect any existing SGN assets currently under GS(M)R. However, the principles set out in GS(M)R will be followed and that the SMF for H100 Fife would be developed within the spirit of the guidance given in the regulations.

We recognise the importance of proactive engagement with the HSE and have been doing so as detailed in in the SMF Section within 6.1.3 (and Appendix H) of our submission, while acknowledging that the HSE cannot fetter their discretion in relation to its assessment of our proposed system. We have agreed in principle a process with the HSE which includes the supply of draft documentation and regular meetings to review the SMF as it progresses through various stages of governance, to ensure that the process and the document does not give them cause for concern. This should ensure efficient progress through review and to the point that the HSE have no objections to the commencement of the project.

We have commissioned an independent review of the H100 Fife SMF as it is developed. The HSE does not currently have a process in place for assessing SMFs for projects such as H100 Fife, so as stated above we have agreed in principle an interim process that involves regular engagement and review of documentation. The HSE is currently working to develop a consistent GB wide approach through the appropriate advisory groups. In the meantime, whilst the HSE Hydrogen for Heat Safety Assurance Protocol is in development, SMF reviews of hydrogen projects will be undertaken at a local level, with subsequent confirmation anticipated that the HSE have no objections to the SMF once the review process is complete.

The BEIS Hy4Heat project is seeking to identify and address safety issues associated with the development and/or testing of hydrogen ready smart meters, pipework, appliances and their installation and use. The scope of this work extends from the Emergency Control Valve to the individual appliances such as fires boilers and cookers and will deliver a package of approved hydrogen installation products. We have supported Hy4Heat in working with IGEM to deliver a reference standard for low pressure hydrogen utilisation Ref IGEM/TSP/20/059 – and an enabling British standard Hydrogen Gas fired appliances guide BSI PAS 4444.