**From:** Matthew Cole <[mattcole999@icloud.com](mailto:mattcole999@icloud.com)>  
**Date:** Wednesday, 2 September 2020 at 20:10  
**To:** <[RIIO2@ofgem.gov.uk](mailto:RIIO2@ofgem.gov.uk)>  
**Subject:** RIIO2 draft determination for gas distribution - general observation

Dear RIIO 2 team,

I would like to take the opportunity to provide an observation in relation to the draft determination for gas distribution.  Please note that I am writing to you on a personal basis and not on behalf of any individual company or organisation, and I am happy for my email to you to be placed in the public domain.

To ensure absolute transparency I was until January 2020 Head of Consumer Vulnerability at npower, and am now a freelance consultant, supporting the energy industry in defining and delivering better outcomes for some of the most vulnerable.  I am also chair of trustees of the Fuel Bank Foundation, a member of Scottish Power Energy Networks’ Customer Engagement Group, and was previously a member of WWU’s Critical Friends Panel that fed into some of its early thinking for its GD2 submission.

I have worked in the energy industry since the mid 1990s.  My first job was to assess the safety case that was published by the HSE following the earlier Piper Alpha incident, and to understand how British Gas plc (as it was) should embed any changes to its offshore procedures and activities to avoid any repetition of the incident.  We should be proud that GB has one of the most resilient – and safe – energy networks across the world, and incidents of this nature are fortunately rare.  Whilst leading npower’s vulnerable consumer strategy however, I became very aware of the personal and family tragedies that repeatedly occur across our country, caused by carbon monoxide poisoning.

Although the probability of suffering from carbon monoxide poisoning from mains gas is very low, consumer awareness of the risk itself is not high and this sadly means that people can die, or suffer from life-limiting conditions from a simple lack of understanding.  From an early-age children are taught that electricity and water do not mix, but I haven’t seen a similar level of understanding about why pilot lights should be blue not yellow, nor the importance of an unobstructed and free-flowing flue.

The draft determination for gas distribution potentially presents an opportunity to address this and to continue the good work in this area previously delivered and already committed to by the GDNs.  I think that it’s important to consider how:

* the gas emergency service could be obliged to routinely test appliances for carbon monoxide when within a property or premise.  Not only would this highlight and eliminate potentially dangerous appliances, it would also establish a greater understanding of the carbon monoxide issue itself
* the gas distribution network companies could jointly lead a single campaign to increase awareness of carbon monoxide poisoning, the tell-tale symptoms, and the immediate action that should be taken.  A joint, cross-industry funded and nation-wide campaign would elevate this important subject, and I suspect would be more effective than a number of smaller, uncoordinated activities.

Please do get back to me if you would like any further information.

Many thanks,

Matt

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