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Stephanie Trotter OBE
CO-Gas Safety
Priory Cottage South
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PO34 5BU

25 August 2020

Dear Stephanie

Thank you for your email and attachments regarding your submission to OFGEM regarding the RIIO GD2 consultation.

I can confirm that the Gas Safety Trust is supportive of any initiatives which increase awareness of carbon monoxide poisoning and prevent death or injury from exposure. As you will know, this is central to our work funding research in this area.

It is our view that all organisations with an interest in gas safety should do all they can to support collective efforts to make people safer; and that the regulators should do all they can to make this happen, so far as is reasonably practicable. From our perspective we make the outputs of the work we fund freely available, so they can be used by those raising awareness and lobbying for change.

However, with regards to testing for CO, whilst we agree in general with the principle you propose, we also recognise the obligations and requirements on the Gas Distribution Networks (GDNs) and emergency service to comply with gas legislation and their safety cases. The engineers have a finite period of time to 'make safe' the gas emergency, and it would not be



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possible, under the current legislation, for engineers to check each appliance for CO in the house as a matter of routine .

To progress your proposal would not be as easy as getting it included in RIIO GD2 – it would require wider, fundamental changes to the Licence Conditions, legislation, and the safety cases that the GDNs operate under. Furthermore, there are distinct rules between what downstream and upstream engineers can do – as you know, only Gas Safe registered engineers can work on gas appliances. Any changes would require significant legislative change in addition to funding being made available.

If Ofgem were to consult on changes of this kind, GST would be keen to contribute and to make our research available.

Best wishes

Chris Bielby
Chairman
Gas Safety Trust