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RIIO-2 Consultation Response

To whom it may concern:

I attended the meeting in Conference room E at No 7 Millbank on Thursday 27th January 2000 at 14:30 and was greatly moved by the submissions, expressions of grief and by the attention focussed then on those deaths from CO poisoning and upon the proposals to avoid others in the future.

Following that meeting proposals were turned into a plan. I remain horrified that this has not been implemented and do not understand why. Based on my experience over the last 33 years I am certain that GDNs, on turning off a gas supply because a fault has occurred resulting in CO being released, should immediately set in train a compulsory investigation of the cause. Such an investigation must be carried out by people who are capable of the necessary forensic engineering thinking and who have a broad understanding of building construction and how building engineering systems can interact in addition an understanding of gas systems.

Simply turning off the gas when an un-thinking gas technician (they are not functioning at the level of an engineer which is a minimum of ISCED Level 6) can attend, find nothing wrong and switch it back on is not acceptable. I have chapter and verse examples.

Another hole in our system is that there is no training (worth the name) in the operation of the types of flue and flue systems in use in Britain now. This contributed to Gas Safe Register sending an inspector, at the request of the HSE, to a residential block to investigate suspected faults in Communal Flue Systems which he did not, by his own admission, understand. Again I have chapter and verse.

Air accident investigations come to mind. The benefit of what has been proposed will be vastly greater if a programme which functions on the principles of the NASA operated Aviation Safety Reporting System were adopted and operated by a body outside the gas industry (to de-couple it from vested interest). I have attached their Program Briefing for your information. This would allow the collection and analysis of faults which could then be used to inform training, practice and legislation more effectively.

Ofgem has a responsibility to protect vulnerable gas users. This is usually taken to mean the "fuel poor." Everybody is vulnerable to CO irrespective of their financial position.

Our protections of the public from toxic and pathogenic emissions are inadequate and it is time to get on with implementing, as a minimum, that which was agreed 20 years ago.

Sincerely,



Jim Kinnibrugh