

Mrs Tankya Rawden
Assistant Coroner
Rutland and North Leicestershire Coroner's Court
Southfield Road,
Loughborough
LE11 2TR

13 March 2020

Dear Mrs Rawden

**Inquest touching the death of Mrs Janet Jasper
Response to Regulation 28 Report – Prevention of Future Deaths**

Following the Inquest touching the death of Mrs Janet Jasper, this letter sets out the joint response to the Regulation 28 Report from the Gas Distribution Networks (GDNs), namely Cadent Gas Limited, Northern Gas Networks Limited, Scotland Gas Networks PLC, Southern Gas Networks PLC and Wales and West Utilities Limited (the "GDNs"). The sympathies of all GDN's remain with Mrs Jasper's family following this tragic accident.

The Regulation 28 Report sets out two separate matters of concern: (1) that there are two hundred and fifty-four properties within the immediate area of the incident which are at risk of floors failing in a similar manner; and (2) that there was inconsistency in the GDNs' requirements for checking adjoining and adjacent properties when responding to reports of internal gas escapes.

As explained during the inquest, the GDNs had a pre-arranged meeting with the Health and Safety Executive ("HSE") on 23 January 2020 and had added to the agenda the consistency of procedures for responding to reports of internal gas escapes (and specifically the checking of adjacent or adjoining properties).

This meeting was attended by the engineering policy leads for each of the GDNs, together with Steve Critchlow and Caroline Lane of the HSE. At this meeting, it was agreed that the GDNs did not have any power to take action in relation to the two hundred and fifty-four properties which were at risk of floors failing and the HSE would consider this point separately.

In relation to the GDN procedures, when the documents were reviewed as a whole and side by side, it was agreed that there was already a consistent approach to checking adjoining and adjacent properties when investigating an internal escape. However, detailed discussions continued in relation to whether the industry could clarify its existing procedures in this regard.

The GDNs met again on 5 February 2020 at the Energy Networks Association and agreed an aligned form of wording, which would further clarify existing procedures in relation to investigating reports of internal escapes.

Existing procedures already require operatives to consider whether gas may be leaking from alternative sources, including from adjoining and adjacent properties. The agreed wording going forward is that operatives shall take all reasonable, practicable and proportionate measures to

investigate the possibility of gas leaking from external sources before confirming a “no trace” result. As part of this investigation, operatives must check immediately adjoined and adjacent properties where it could be reasonably assumed, based on site conditions, that they are a possible cause of the reported smell of gas.

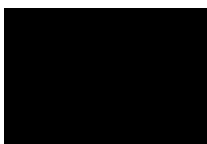
Where it is not possible to gain access to immediately adjoined and adjacent properties, gas detection checks will be undertaken at accessible building ingress points, such as letterboxes, air bricks, vents, windows etc. A “no trace” result can only be recorded under the clarified procedures where no gas has been detected at the original property and where no gas has been detected following all reasonable, practicable and proportionate measures to investigate the possibility of gas leaking from external sources.

In February 2020, the GDNs met again with Steve Critchlow of the HSE to report back on their proposed approach. Steve Critchlow agreed with the proposed changes and considered that they would meet the Coroner’s aims.

All of the GDNs will be briefing their operational teams on the revised requirements, which are expected to be in place across all networks by mid-summer.

Although it cannot be concluded that Mrs Jasper’s tragic death could have been prevented had these revised procedures been in place at the time, we trust that the approach being adopted by the industry going forward addresses any concerns that may have arisen during the Inquest.

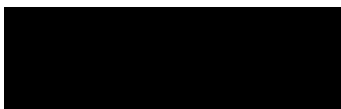
Yours sincerely



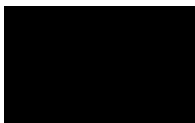
**Chief Safety and Strategy Officer
Cadent Gas Limited**



**Head of Engineering &
Network Strategy
Scotland Gas Networks PLC &
Southern Gas Networks PLC**



**Head of Asset Integrity
Northern Gas Networks Limited**



**Chief Operating Officer
Wales and West Utilities Limited**

cc.  HSE