

## Submission for Deadline 4 in advance of ISH2 – by James Hewitt

1) The Applicant states that it has had an exchange of letters with a prospective manufacturer of generating units able to burn fuel 100% of which comprises hydrogen. (It is not inconceivable that the Applicant commissioned the manufacturer's response.)

However, the Applicant does not state whether it proposes to wait until that (or another) manufacturer actually makes such units – which might be several years from now, if ever.

The Applicant gives the impression that it proposes to purchase and install generating units which, at some time in the future, could be converted to burn mixtures of methane and hydrogen of up to 100% hydrogen. This would be a remarkable and perhaps unique achievement especially at a price which is not prohibitive (even assuming that substantial changes to the structures which house the units would not be required).

The Applicant gives no indication as to the commercial or technical feasibility of doing so (whether for 100% hydrogen or less) – or the price above that of methane which it would choose to pay for blue hydrogen instead of methane.

The Applicant offers no guarantee that it would ever burn any hydrogen, let alone 100%. Prudence suggests that such a guarantee – subject to dissuasive penalties, declining as the percentage of hydrogen rises – should be a pre-requisite of any planning approval.

2) Since my previous submission, prospects for CCS – implicitly including blue hydrogen – have diminished.

2.1) Equinor, a partner of the Applicant (particularly as a supplier of blue hydrogen), has stated that its outlook for capital expenditure “is reduced by US\$ 4 billion, mainly within power and low carbon”<sup>1</sup> – “reflecting market developments”<sup>2</sup>.

2.2) Microsoft, which procures almost all the carbon removal credits in the power sector, is said to have advised staff that its support is likely to reduce.<sup>3</sup> Microsoft rebuts this.<sup>4</sup>

2.3) Drax, the owner of Drax power station – has written off £48 million of expenditure on BECCS, reflecting that its proposed CO2 capture facility is unlikely to proceed in the short to medium term.<sup>5</sup> This gives the impression that the future of Drax power station is secure without CCS. (Drax power station is the UK's leading single point emitter of CO2 and, inappropriately, hitherto regarded as the bedrock for negative emissions assumed in carbon budgets for UK Net Zero 2050).

Further, support for the burning of methane has diminished, especially in unabated gas-fired power stations beyond 2030. Factors contributing to this include decline of energy security (due particularly to war and erratic policy), the demise of prospective datacentres<sup>6</sup>, and the upstream greenhouse gas emissions from production of LNG and its onwards supply.

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<sup>1</sup> [REDACTED] and Slide 11

<sup>2</sup> Slide 11 of “CEO and CFO presentation Q4 and full year 2025”  
[REDACTED]

<sup>3</sup> Bloomberg newsletter 13 April 2026 [REDACTED]

<sup>4</sup> ESG Today “Microsoft Says Its Carbon Removal Program “Has Not Ended”” 14 April 2026  
[REDACTED]

<sup>5</sup> Page 14 Drax Group plc “Annual report and accounts 2025” [REDACTED]  
[REDACTED]

<sup>6</sup> For example: The Guardian “Revealed: UK's multibillion AI drive is built on ‘phantom investments’” 09 March 2026 [REDACTED]  
[REDACTED]