

1a)

Serving as Nationally Significant Infrastructure, this proposal would tend to increase the vulnerability of the UK's national grid to hostile acts unless the Applicant provides commensurate security measures.

The use of drones to target civil infrastructure has become commonplace and is threat recognised in the UK's Strategic Defence Review.

1b)

Given this, the global warming impact of sulphur hexachloride gas "SF6" (or similar) escaping from switchgear (including during their manufacture) should perhaps be taken into account. The impact of such emissions, in each consecutive year up until the due date for UK Net Zero are presumably salient to the assessment of the Application – as are emissions associated with the full supply chain of methane and hydrogen upstream of the project.

The attention of the Secretary of State for Energy Security and Net Zero has been drawn to the basis of advice from the Climate Change Committee ("CCC") concerning Carbon Budget Seven. That basis seems inconsistent with the legal requirement of the Climate Change Act (2008) to revise the due date for Net Zero in accordance with the science concerning - necessarily global - progress towards worldwide Net Zero.<sup>1</sup> It is likewise inconsistent with the UK's international obligations under that Act.<sup>2</sup> To be consistent requires greater pace of decarbonisation and an earlier date for UK Net Zero – in contrast to the what the Applicant's proposal conveys.

2)

One manufacturer of dual methane / hydrogen fuel turbines asserts that the price of "low-carbon" hydrogen is likely to remain between two and ten times greater than that of methane beyond the end of the decade.<sup>3</sup> The greater the difference, the greater the cost of electricity delivered from power stations which are built - purportedly - to "stimulate the hydrogen economy and support the development of commercially viable low-carbon technology". As such, those power stations would presumably be amongst the highest cost producers of dispatchable power.

The price of electricity for UK businesses and domestic users tends to be based on the marginal cost of gas-fired generation. That cost will rise as the power supplied to the grid becomes decarbonised and gas-fired generation becomes more intermittent – and when the price of methane reflects its social, environmental and governance cost. The price of electricity is already a major constraint for those users.

The trade-off between that price and the Applicant's proposal may constrain the latter's merit.

*Thank you for the attention you have given to my comments in this and earlier submissions.*

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<sup>1</sup> "Climate Change Act (2008) Clause 6 (2) (a) <https://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>2</sup> *Ibid* Clause 8 (2)

<sup>3</sup> Uppermost bullet point, page 2 of "Hydrogen overview" GE Vernova (2024) [https://www.gevernova.com/content/dam/gepower-new/global/en\\_US/downloads/gas-new-site/future-of-energy/GEA35685-GEV-Hydrogen-Overview\\_8.5x11\\_RGB\\_R4.pdf](https://www.gevernova.com/content/dam/gepower-new/global/en_US/downloads/gas-new-site/future-of-energy/GEA35685-GEV-Hydrogen-Overview_8.5x11_RGB_R4.pdf)