

**DECC COMMENTS ON SECOND DRAFT OF THE ENERGY CLIMATE CHANGE
RISK ASSESSMENT REPORT (28th February 2011)**

(NAME REDACTED)

Overall structure, perspectives and governance of the report

- We thank the contractors for the improvements to the report. However, there are several areas on the policy mapping that are inaccurate; some of our earlier comments do not appear to have been addressed; and the response functions selected are in themselves fine, but provide a narrow set.
- Clarity on the ownership of the document is important. We would appreciate clarity on that because, there are potential reputational risks.
- Much of this report is from the perspective of industry (rather than policy makers). This reflects the genesis of the document, which involved consultation of industry and regulators; but not DECC policy officials or the academic community.
- It is disappointing therefore that where we did offer policy relevant gaps on the first draft, these do seem to have been taken up and there appears to be a real reluctance not to move away from the tramlines that were established early on.
- There are consequences. This lends strength to the report in terms of the current status quo and the sensitivity of current energy system, but it currently contributes little to the future considerations that policy makers are grappling with.
- The report should be free-standing so that it provides a comprehensive treatment of energy generation, distribution and use. At the moment, important areas are found in the flooding or marine sector reports. In addition, the detailed analysis in important areas like flooding should be included so that there is a clear line of sight between any conclusions and the evidence base; at the moment it is often superficial and the detail is embedded elsewhere with a cross-reference to it.

Outstanding evidence gaps

- On page 16 demand for water by the energy sector is not explored because it apparently, did not score highly in the initial workshops. Despite this, we mentioned the importance of this in our earlier comments but this has not been taken forward.
- Nuclear and wind are underrepresented in the report. The government has made firm commitments in these areas to meet EU and UK energy and emissions objectives. Our earlier requests appear to have been overlooked in this report. If they have been addressed in the flooding or maritime report, these need to be imported into the energy sector report.

- Table 8.4 shows the number of power stations with significant likelihood (1:75) of tidal /coastal flooding. It is not clear if these assessments also take account of sea level rise and tidal surge and coastal erosion. Clarity on that is important. It would also be useful to have data and information on nuclear power stations disaggregated because potentially, this opens up a completely different set of risks. For a critically important area like flooding, the inclusion of the detailed underpinning analysis (in the flooding report) into this chapter is important.
- The assessment of gas and oil is in the marine sector report – it should be imported into this one. It makes no sense to leave it out.
- Sea level rise is relevant to tidal energy generation, not covered, and yet data is available from UKCP09.
- The energy demand figures for cooling are useful in as far as they go. But, limitations need to be recognised. These demand figures are largely derived from anticipated uptake of air conditioning and the report concludes that these extra demands do not represent a challenge. This may represent the situation now, but how robust is this assessment in future in relation to the electrification of transport system? In addition, what account is made of urban heat island effects, are these modelled into these figures (we note that only one city is represented) : might this elevate the demand?

Science

- The report would be more accessible to policy makers if there is a brief explanation of what P10, P50 and P90 probabilities actually mean and how to correctly interpret them. This is particularly important in chapter 8 which provides the meat of the report's findings. This can be done very simply and very succinctly taking one of the measurements as an example.
- Over and above the probability distribution functions (which the tables essentially describe) it would be useful to acknowledge that we have different levels of confidence in the variables that are measured e.g. better for temperature rather than precipitation (though this in itself might be more complex).
- It would be helpful to have a section that collated the important evidence gaps.

Policy

- There are many factual errors and assertions in this draft. For example, it is not clear what the report is saying about extreme weather events : on the one hand saying there are measures in place to help consumers and on the other policies do not address more severe events that are more likely to occur (page 18).

- Also (page 18) the reference to lack of specific policies to address the heating and cooling. The Green Deal is relevant here. Also see comments below for the Built environment report but relevant here too.
- Rather than go into the in detail here on these and other outputs. We strongly recommend the contractors look at the departments Annual Energy Statement published last year. This gives a better indication of what the department is doing in these and other areas. It can be found at :
- [http://www.decc.gov.uk/en/content/cms/what we do/uk supply/aes/aes.aspx](http://www.decc.gov.uk/en/content/cms/what_we_do/uk_supply/aes/aes.aspx)

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