

Response by Adrian Holmes

Dear Department of Energy and Climate Change

Reference: Consultation on revised Funded Decommissioning Programme Guidance for New Nuclear Power Stations

Question 1)

The base case proposed is a good idea - ie. that operators are required to produce fully costed estimates for de-commissioning with technology used today. However I noticed that there was provision for discounting of the FDP :

It is assumed that for an FDP submitted for approval the cost estimates will be calculated on a money of year basis (escalation and/or

discounting terms will be applied post the initial cost assessment.

I have absolutely no confidence in this not being used to somehow massage the figures post submission. I don't think this is a good idea. The initial cost should be the bottom line - ie . only subject to increase due to unforeseen circumstances.

Question 2)

- *contains robust cost estimates which take due account of risk and uncertainty;*

There is a fundamental flaw in all of this in that nowhere is the operator specifically required to factor in effects of Climate Change as far as I can see. Given the 40-60 year lifetime plus de-commissioning afterwards - this is not realistic. In fact the only mention of climate change is in the

Department of Energy and Climate Change title references! Given the uncertainty of this I would say it rules out any new developments on the east and south east coasts of the UK.

Best wishes

Adrian Holmes