



# Department of Energy and Climate Change

## **THE ENERGY BILL 2008**

Pre-consultation discussion paper  
No. 1: on a methodology to  
determine how the fixed costs of  
building a geological disposal  
facility should be apportioned to  
and shared between operators of  
new nuclear power stations

**OFFICE FOR NUCLEAR  
DEVELOPMENT**

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# Section 1: Introduction

## About this paper

- 1.1 This is the first in a series of three informal discussion papers being issued by the Office for Nuclear Development during autumn 2008. The decision to produce these papers was set out in the Government Response to the Consultation on Funded Decommissioning Programme Guidance for New Nuclear Power Stations<sup>1</sup>.
- 1.2 Each of these papers addresses specific issues relating to the cost estimates for waste management, disposal and decommissioning and establishing an indicative fixed unit price for the disposal of intermediate level waste (ILW) and spent fuel from new nuclear power stations.
- 1.3 This paper discusses a methodology to determine how the fixed costs of building a geological disposal facility should be apportioned to and shared between operators of new nuclear power stations.
- 1.4 There will be two further papers in this series:
  - a methodology for establishing an indicative fixed unit price for the disposal of ILW and spent fuel;
  - the Department of Energy and Climate Change (DECC) cost model, with our updated estimates of total costs for waste management, disposal and decommissioning.
- 1.5 These papers are intended for discussion with stakeholders during autumn 2008. This is not a formal consultation and we are not specifically seeking public views at this stage. However these papers are being made available on the Department's website and if interested parties wish to comment during the autumn on the issues covered in these papers they may do so, and these comments will be taken into account as part of the development of the Government's policy on these issues. Comments can be sent by letter, fax or email (email preferred) to:

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Email: [DecomGuidance@berr.gsi.gov.uk](mailto:DecomGuidance@berr.gsi.gov.uk)
- 1.6 There will be a formal public consultation on the issues covered by the three papers in spring 2009. The finalised approach will then be published alongside the finalised Funded Decommissioning Programme Guidance in summer 2009.

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<sup>1</sup> <http://www.berr.gov.uk/files/file47629.pdf>

## Section 2: Background

### The White Paper on Nuclear Power

- 2.1 The White Paper on Nuclear Power<sup>2</sup> in January 2008 set out the Government's formal response to the consultation on the future of nuclear power. The White Paper stated that:

*“The Government believes it is in the public interest that new nuclear power stations should have a role to play in this country's future energy mix alongside other low-carbon sources; that it would be in the public interest to allow energy companies the option of investing in new nuclear power stations; and that the Government should take active steps to open up the way to the construction of new nuclear power stations. It will be for energy companies to fund, develop and build new nuclear power stations in the UK, including meeting the full costs of decommissioning and their full share of waste management costs.”*

- 2.2 The Government confirmed in the White Paper its commitment to put in place legislative arrangements to ensure that operators of new nuclear power stations have secure financing arrangements in place to meet the full costs of decommissioning and their full share of waste management costs.

### The Energy Bill

- 2.3 Clauses in the Energy Bill<sup>3</sup> currently before Parliament create a framework for implementing this policy. The Bill requires operators of new nuclear power stations to have a Funded Decommissioning Programme (FDP), approved by the Secretary of State for Energy and Climate Change, in place before construction of a new nuclear power station begins and to comply with this programme thereafter.

### Nuclear Liabilities Financing Assurance Board (NLFAB)

- 2.4 In the Nuclear White Paper, the Government announced its intention to create a new independent advisory body, the Nuclear Liabilities Financing Assurance Board (NLFAB). This new board will provide independent scrutiny and advice on the suitability of the FDPs submitted by operators of new nuclear power stations.
- 2.5 The NLFAB will advise the Secretary of State on the financial arrangements that operators submit for approval. The NLFAB will also provide advice to the Secretary of State on the regular reviews and ongoing scrutiny of funding arrangements. The NLFAB is expected to consist of experts from relevant fields such as current or former fund managers, pension trustees, actuaries and nuclear specialists. The board members will be appointed by the Secretary of State.

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<sup>2</sup> Meeting the Energy Challenge, A White Paper on Nuclear Power  
<http://www.berr.gov.uk/whatwedo/energy/sources/nuclear/whitepaper/page42765.html>

<sup>3</sup> Energy Bill, Session 2007-08, HL Bill 086 07-08

## **FDP Guidance**

- 2.6 The FDP prepared by the operator of a new nuclear power station must include:
- provision for the steps necessary to decommission the installation and manage and dispose of hazardous waste;
  - an estimate of the costs of taking those steps; and
  - details of any security to be provided in relation to those costs.
- 2.7 Guidance will assist operators in understanding their obligations under the Bill. In spring 2008 we consulted on draft FDP guidance<sup>4</sup>. We received a total of 43 formal written responses<sup>5</sup> and the Government's response to the consultation<sup>6</sup> was published on 18 September 2008. The guidance will be finalised following Royal Assent of the Energy Bill.

### **Updated cost estimates for waste management, disposal and decommissioning and an indicative fixed unit price for disposal of ILW and spent fuel**

- 2.8 Alongside the draft FDP guidance, in the consultation document we also published further background information on the:
- Government's policy to set an indicative fixed unit price for the disposal of ILW and spent fuel;
  - schedule for when Government would expect to take title to and liability for an operator's ILW and spent fuel;
  - indicative timeline for publication of cost estimates for waste management, disposal and decommissioning and a methodology for establishing an indicative fixed unit price for the disposal of ILW and spent fuel.
- 2.9 The Government would expect to set a fixed unit price based on the operator's projected full share of waste disposal costs at the time when the approvals for the station are given, prior to construction of the station. The Government would expect to set a fixed price per unit of ILW or spent fuel for disposal, to ensure that the amount that operators pay is relative to the amount of waste or spent fuel they produce. This price will be set at a level over and above expected costs and will include a significant risk premium. This risk premium should help to ensure that the operator bears the risks around uncertainty in waste costs and will provide the taxpayer with material protection against the eventuality that the actual costs of geological disposal exceed the projected costs.

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<sup>4</sup> Consultation on Funded Decommissioning Programme Guidance for New Nuclear Power Stations, URN 08/637, February 2008: <http://www.berr.gov.uk/files/file44486.pdf>

<sup>5</sup> The responses to the consultation are available at:  
<http://www.berr.gov.uk/whatwedo/energy/sources/nuclear/consultations/closed-response/fdp-responses/page48057.html>

<sup>6</sup> The Government Response to the Consultation on Funded Decommissioning Programme Guidance for New Nuclear Power Stations, URN 08/1246, September 2008:  
<http://www.berr.gov.uk/files/file47629.pdf>

- 2.10 Should the actual costs of providing the waste disposal service prove lower than expected, these lower costs will not be passed on to nuclear operators, who would have gained from certainty of a fixed price and would not have been exposed to the risk of price escalation.
- 2.11 The indicative fixed unit price for the disposal of ILW and spent fuel will be based on an estimate of the costs of disposing of these materials in a geological disposal facility (GDF). This costing will include:
- estimates of the costs of disposing of ILW and spent fuel in the GDF;
  - a significant risk premium to cover the risk that the eventual costs of building a GDF are higher than estimated, and the risk that the GDF is not available when required by the agreed schedule for the Government to take title to and liability for the waste.
- 2.12 The indicative timeline included for information in the FDP guidance consultation document set milestones for the publication of:
- a methodology to determine how the fixed costs of building a GDF should be apportioned to and shared between operators of new nuclear power stations;
  - a methodology for establishing an indicative fixed unit price for the disposal of ILW and spent fuel;
  - the DECC cost model, with updated estimates for the total cost of waste management, disposal and decommissioning.
- 2.13 In response to the level of interest shown by stakeholders during the consultation, we published a revised indicative timeline in the Government response to the FDP guidance consultation, to provide stakeholders with further opportunities to feed in views on these three subjects as work progresses. This paper is the first in a series of three papers intended to support discussions with stakeholders over autumn and winter 2008. As set out in Section 1 above, there will then be a public consultation on the proposals in these three areas in spring 2009.

## **Government policy on geological disposal**

- 2.14 In the White Paper on Nuclear Power the Government set out its conclusion on waste and decommissioning:

*“Having reviewed the arguments and evidence put forward, the Government believes that it is technically possible to dispose of new higher-activity radioactive waste in a geological disposal facility and that this would be a viable solution and the right approach for managing waste from any new nuclear power stations. The Government considers that it would be technically possible and desirable to dispose of both new and legacy waste in the same geological disposal facilities and that this should be explored through the Managing Radioactive Waste Safely programme. The Government considers that waste can and should be stored in safe and secure interim storage facilities until a geological facility becomes available.”*

2.15 On 12 June 2008, the Government published the White Paper “Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal”<sup>7</sup>. The White Paper set out the framework for managing higher activity radioactive waste in the long-term through geological disposal, coupled with safe and secure interim storage and ongoing research and development to support its optimised implementation.

2.16 The Managing Radioactive Waste Safely (MRWS) White Paper gave the following explanation of what is meant by “geological disposal”:

*“Geological disposal involves isolating radioactive waste deep inside a suitable rock formation to ensure that no harmful quantities of radioactivity ever reach the surface environment. It is a multi-barrier approach, based on placing wastes deep underground, protected from disruption by man-made or natural events. Geological disposal is internationally recognised as the preferred approach for the long-term management of higher activity radioactive waste.”*

2.17 On waste from new nuclear power stations, the MRWS White Paper stated that it is not possible to provide at this time a definitive inventory of radioactive waste that would arise from a new nuclear build programme. This is because it will depend on aspects such as the reactor type, how many new reactors there are and how long they operate.

2.18 The MRWS White Paper also set out the Government’s view that geological disposal and an approach based on voluntarism and partnership as a means of siting of a geological disposal facility is the right way forward. The Government does not wish to be over-prescriptive about the way that the voluntarism and partnership arrangements should work at the outset as individual local circumstances differ and, to a degree, a tailored approach to any discussions will need to be taken. This flexibility does not apply to the way in which technical issues, such as geology, are assessed, where there will be objective and consistent assessment.

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<sup>7</sup> <http://www.defra.gov.uk/environment/radioactivity/mrws/pdf/white-paper-final.pdf>

# Section 3: DECC's cost modelling work

## The need to model costs

- 3.1 To ensure that the Government can have confidence that operators of new nuclear power stations make adequate financial provision, it is important to develop robust updated estimates of the likely total costs of waste management, disposal and decommissioning. To enable this a methodology has been developed to allow Government to estimate these costs, as well as allowing the associated uncertainties to be estimated, and the relative significance of these uncertainties to be assessed. It allows for the calculation of the total size of the liability, the spend profile associated with discharging the liability, and thus discounted costs. The FDP guidance consultation document described the methodology in outline.
- 3.2 Operators of new nuclear power stations will be expected to calculate their own cost estimates for waste management, disposal and decommissioning. Operators will need to ensure that there is transparency between, and separation and separate reporting of, the two sets of liabilities which arise in relation to decommissioning and waste management on the one hand and waste disposal on the other, as well as in the monies accumulated to meet the costs of each. Operators' own estimates will differ from those produced by the Government as they will be specific to the reactor design, site and other operational decisions of the operator, rather than generic. However, this methodology will provide operators with an example of how they might calculate their own cost estimates; as well as ensuring that the Government, the NLFAB and those responsible for managing operators' Funds have a benchmark against which to assess the estimates produced by the operators.
- 3.3 The Government expects to determine the appropriate level for the fixed unit price, drawing on the cost modelling work carried out by DECC and by the Nuclear Decommissioning Authority (NDA). A methodology for establishing an indicative fixed unit price for the disposal of ILW and spent fuel will be the subject of the second paper in this series.

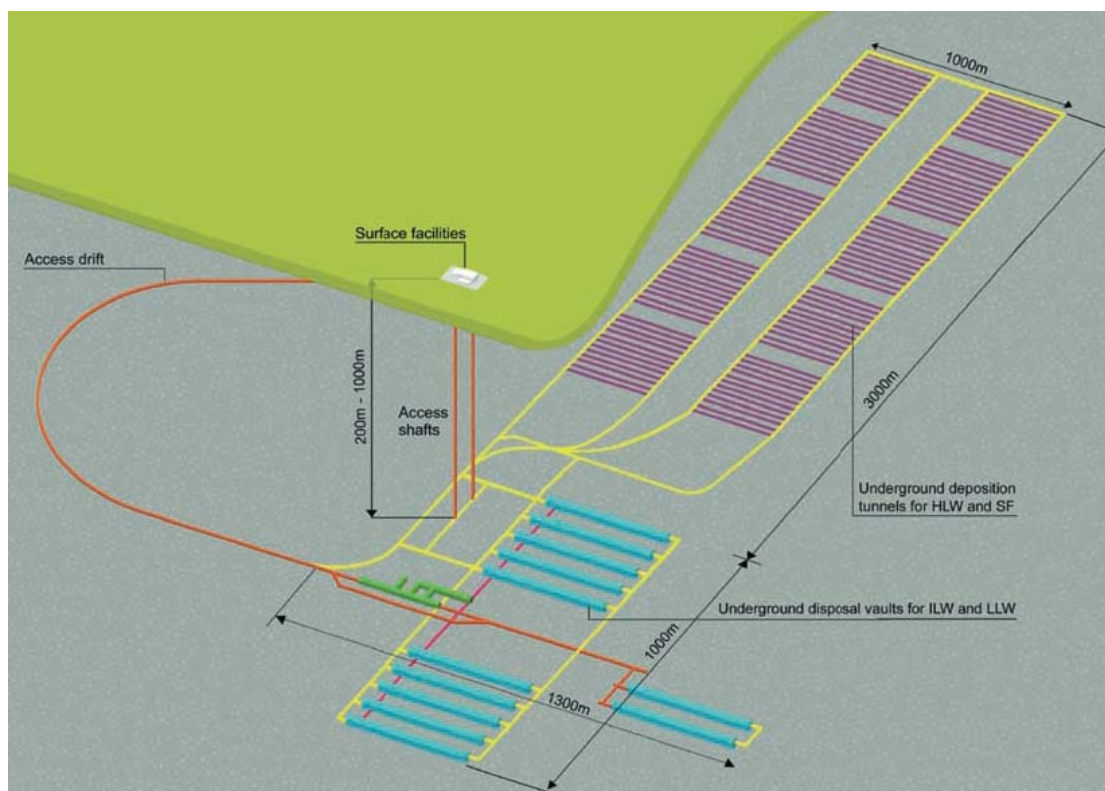
## The costs of a geological disposal facility

- 3.4 The NDA has developed a Parametric Cost Model to generate updated estimates of the costs of geological disposal. It allows the key parameters to be changed that could impact on the costs of implementing a GDF in the UK.
- 3.5 The output from the Parametric Cost Model results from a series of assumptions being selected and, as a consequence, the cost estimates it produces depend on the assumptions used. A range of parameters can be varied to examine the cost implications of different scenarios. For example, the Parametric Cost Model can vary parameters such as rock type, depth of repository and waste inventories, to reflect their impact on

costs. The Parametric Cost Model can also estimate the cost for disposing of a specified amount of ILW and spent fuel in a GDF.

3.6 The diagram below shows a generic co-located GDF. The costs of such a GDF can be broken down into:

- Fixed costs, such as the construction of the surface facilities, access shafts and access drift. These are considered to be predominantly fixed costs as they are largely unrelated to the volume of waste being emplaced.
- Variable costs, such as the construction of underground deposition tunnels for spent fuel, and underground disposal vaults for ILW. These are considered to be variable costs as they vary with the volume of waste being emplaced.



3.7 The Parametric Cost Model can be used to derive estimates of both fixed and variable costs. This paper relates to how new build's contribution to the fixed costs of a GDF should be determined.

## Overview of DECC's cost modelling

- 3.8 DECC's cost modelling will produce robust and regularly updated estimates of the likely total costs of waste management, disposal and decommissioning. The FDP consultation included a table setting out the principal cost streams and how they will be met, but broadly:
- Decommissioning begins when the reactor is shut down with no intention of further use for the purpose of generating electricity and ends when all station buildings and facilities have been removed and the site has been returned to an end state which has been agreed with the regulators and the planning authority.
  - Waste management costs relate to, for example: interim storage for ILW and spent fuel; the conditioning and packaging of ILW and the encapsulation of spent fuel; and the transport of ILW and spent fuel for disposal. The costs of disposing of low level waste must also be met by the operator and will not be covered by the fixed unit price.
  - Waste disposal costs are those relating to the disposal of ILW and spent fuel in a GDF and will be covered by the fixed unit price.
- 3.9 The DECC cost model will base its estimates for the costs of decommissioning, waste management and waste disposal on a number of factors. The principal factors considered are: waste inventories from varying reactor types and the fixed unit prices for their disposal; benchmark estimates for the engineering costs involved in decommissioning the power station; and assumptions on timescales on which the power station will operate and be decommissioned. It will produce a spend/time curve from which total discounted and undiscounted costs can be generated, together with associated uncertainties. The DECC cost model will be considered in more detail in the third paper of this series.
- 3.10 In order to derive the waste disposal cost input data for the DECC cost model, it will be necessary to calculate a fixed unit price for the disposal of ILW and spent fuel. The methodology by which these calculations will be performed will be considered in more detail in the second paper of this series.
- 3.11 In turn, determining the indicative fixed unit price will require estimates of the costs of waste disposal. One element of this will be a contribution to the fixed costs of the GDF. This is the subject of this paper.

# Section 4: Methodology to determine how the fixed costs of building a GDF should be apportioned to and shared between operators of new nuclear power stations

## 4.1 General principles underpinning the methodology

4.1.1 The FDP consultation stated that Government considers that the full share of waste management costs includes a contribution towards the fixed costs of building a GDF.

4.1.2 We intend that a new build operator's contribution to the fixed costs of building a GDF should be calculated as part of the methodology for setting a fixed unit price for disposal of ILW and spent fuel and incorporated into the fixed unit price. Hence the fixed unit price will be based on modelling of the estimated total costs of the disposal of ILW and spent fuel.

**4.1.3 This modelling will assume that a new build operator's share of fixed costs of the GDF should be calculated in proportion to its share of estimated total variable costs.**

4.1.4 This is because we consider that the modelling assumption should be that a new build operator's contribution to the fixed costs of the GDF should be in proportion to the use it makes of the GDF's capacity. We consider that the best way of measuring this is through estimates of its share of total variable cost, as this takes into account both the quantity and the nature of the wastes emplaced.

4.1.5 For each proposed new nuclear power station we will use the predicted volumes of the ILW and spent fuel it will generate to develop estimates of the cost of disposing of these wastes.

4.1.6 The principle underpinning DECC's cost modelling is that a new build operator's share of fixed cost should be determined by the use it makes of the GDF. In practice, however, the assignment of fixed costs must be based upon a prediction of waste arisings and a prediction of the cost associated with the GDF. There are a number of uncertainties associated with this calculation:

- Uncertainty around the costs of the GDF. This will be taken into account in DECC's cost estimates – see section 4.2 below.
- The timing of the payment of a new build operator's contribution, from the accumulated waste management fund, to the fixed costs incurred by Government in constructing the GDF. This will form part of the fixed unit price, hence it is likely that the contribution will be made a considerable time after the fixed costs were incurred – see section 4.3 below.

- It will be for energy companies to build new nuclear power stations, therefore our cost modelling needs to allow for uncertainty in the size of the new build fleet, and hence the total variable cost of disposing of new build waste. This uncertainty over the size of the new build fleet leads to a corresponding uncertainty over the feasibility of the co-disposal of legacy and new build waste in a single GDF – see section 4.4 below.

4.1.7 Hence the modelling of costs for the management and disposal of ILW and spent fuel from new nuclear power stations is not straightforward and must take account of inevitable uncertainties.

4.1.8 Some of these uncertainties are discussed below and more detail on our proposed handling of them will be provided in the second paper of this series, which covers the methodology to establish an indicative fixed unit price. The level of uncertainty around these issues will be an important consideration in determining the level of the risk premium element of a fixed unit price. The risk premium means that the fixed unit price will be set over and above expected costs, to ensure that the operator bears the risk around uncertainty in waste cost and to provide material protection to the taxpayer.

## **4.2 Handling uncertainty over the cost of the GDF**

4.2.1 As stated in the NDA's Annual Report and Accounts 2007/08 the current best estimate within the range of potential costs for the GDF is £12.2 billion<sup>8</sup>. This figure covers both the fixed costs of the GDF and the variable costs of the disposal of legacy waste, but does not include any provision for new nuclear waste or a number of other potential wastes.

4.2.2 The cost of the GDF is subject to uncertainty. It is influenced by many factors, including the inventory of waste, timings of waste arisings, the geology of the site in question and the design of the GDF.

4.2.3 NDA's Parametric Cost Model, described in Section 3 above, has been developed to model the cost impact resulting from changing those factors. NDA, at the request of DECC, has developed a range of scenarios for geological disposal, which differ from that used to develop NDA's current best estimate as stated in its Annual Report and Accounts. These have been used in the Parametric Cost Model to identify the cost impact of these scenarios, compared to NDA's current best estimate.

4.2.4 This data will be used by DECC to generate distributions of total estimated costs – both fixed and variable – for the disposal of ILW and spent fuel from a new nuclear power station in a GDF.

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<sup>8</sup> The lifetime cost of geological disposal includes research, design, construction, operation and closure. The total undiscounted costs are £12.2 billion, of which the NDA's share is £10.1 billion, which is then discounted at 2.2% to give a discounted amount of £3.4 billion, the balance being payable by other users.

- 4.2.5 These distributions will be used to inform the decision Ministers make when setting a fixed unit price for the disposal of ILW and spent fuel. This price will be set at a level over and above expected costs and will include a significant risk premium. This risk premium should help to ensure that the operator bears the risks around uncertainty in waste costs and will provide the taxpayer with material protection against the eventuality that the actual costs of geological disposal exceed the projected costs.
- 4.2.6 Should the actual costs of providing the waste disposal service prove lower than expected, these lower costs will not be passed on to nuclear operators, who would have gained from certainty of a fixed price and would not have been exposed to the risk of price escalation.
- 4.2.7 The risk premium will be discussed further in the second paper in this series.

### **4.3 The timing of the payment of the contribution to the fixed costs of the GDF**

- 4.3.1 The Government will agree to take title to and liability for an operator's ILW and spent fuel according to a schedule that will be agreed at the same time as the operator's FDP is approved and alongside setting a fixed unit price for the waste disposal service.
- 4.3.2 The Government will expect to base the schedule on conservative estimates of the availability of geological disposal facilities, to minimise the risk that the Government will need to take title to and liability for an operator's ILW and spent fuel before disposal facilities are available to dispose of these materials. We will set the level of the risk premium element of the fixed unit price to take account of the risk to the Government that the construction of disposal facilities is not complete by the date or dates specified in the agreed schedule. Firm dates for construction of disposal facilities are not yet available; however greater clarity will emerge as the MRWS programme proceeds.
- 4.3.3 We expect that the monies to cover the fixed unit price for the waste disposal service will be paid to the Government as title to and liability for each operator's waste is transferred to the Government. However we are considering whether there may be a case for some of this amount to be paid to the Government during the power station's generating life. If the Government determines that this would be necessary, we would agree a schedule of payments with each operator at the same time as the FDP is approved.
- 4.3.4 It is likely to be some decades before a GDF is able to take ILW and spent fuel from new nuclear power stations. The assumption in DECC's current cost modelling work is that payments to cover the fixed unit price for the waste disposal service will be paid to the Government as title to and liability for each operator's waste is transferred to the Government. Hence, on this assumption, new build's contribution to

the fixed costs of the GDF is likely to be made many years after the fixed costs of the GDF are incurred.

- 4.3.5 For this reason it is necessary to consider whether some adjustment should be made to the fixed cost contribution, in addition to escalating for inflation, to reflect the long timescales involved and the likely gap between the Government incurring the fixed costs of constructing the GDF and new build operators paying their contribution towards these fixed costs. This will be discussed in more detail in the second paper in this series, on the methodology for establishing an indicative fixed unit price.

#### **4.4 Handling uncertainty around the size of the new build fleet and the co-disposal route**

- 4.4.1 Government policy is that it would be technically possible and desirable to dispose of new and legacy waste in the same GDF. However the FDP consultation acknowledged that the size of the new build programme, and the specification of the site chosen for the GDF, will have an impact on the feasibility of co-disposal.
- 4.4.2 Hence DECC's cost modelling needs to take account of the possibility that, with a large new nuclear programme, co-disposal proves not to be feasible and another GDF is required. A second GDF would naturally mean a significantly greater total cost, although such cost would be spread over a larger nuclear programme. Additionally, as discussed above, the additional fixed costs for a second GDF would probably be incurred considerably later than those for the first GDF.
- 4.4.3 It is important to note that the scenario of a second GDF for new build waste is an assumption for cost modelling purposes only and should not be considered as representing any change in Government policy, as stated above.
- 4.4.4 The methodology for establishing an indicative fixed unit price will take account of the risk that co-disposal proves not to be feasible. It will assume that this risk is related to the size of the new build fleet – i.e. that it is negligible in the event of limited new build but becomes significant in scenarios with a large new build fleet.
- 4.4.5 More detail on the methodology for establishing an indicative fixed unit price will be provided in the second paper in this series. We intend to include an explanation of how we will take account of the risk that co-disposal proves not to be feasible in the scenario of a large new build fleet, and will also look to set out how we intend to establish the level of the fixed unit price while there is uncertainty over the number of new nuclear power stations that will be built.

# Section 5: Conclusions and next steps

## Summary of key points from this paper

- 5.1 This paper covers a range of issues relating to this methodology. The key points, which will be the focus of our discussions with stakeholders on this topic, are that:
- A new build operator's contribution to the fixed costs of building a GDF should be calculated as part of the methodology for setting a fixed unit price for disposal of ILW and spent fuel and incorporated into the fixed unit price.
  - The modelling assumption should be that a new build operator's contribution to the fixed costs of the GDF should be in proportion to the use it makes of the GDF's capacity. We consider that the best way of measuring this is through estimates of its share of total variable cost, as this takes into account both the quantity and the nature of the wastes emplaced.
  - The assumption for DECC's cost modelling work should be that payments to cover the fixed unit price – and hence the new build operator's contribution to the fixed costs of the GDF – will be paid to the Government when title to and liability for each operators' waste is transferred to the Government, hence it is necessary to consider whether some adjustment should be made to the fixed costs contribution, in addition to escalating for inflation.
  - DECC's cost modelling should take into account the possibility that co-disposal proves not to be feasible – as a result of a new nuclear programme being large – and the corresponding risk that another GDF is required (N.B. this is an assumption for cost modelling purposes only and should not be considered as representing any change in Government policy).

## Next steps

- 5.2 This is the first in a series of three informal discussion papers being issued by the Office for Nuclear Development. These papers are intended for discussion with stakeholders during autumn 2008.
- 5.3 This is not a formal consultation and we are not specifically seeking public views at this stage. However these papers are being made available on the DECC website and if interested parties wish to comment during the autumn on the issues covered in these papers they may do so, and these comments will be taken into account as part of the development of the Government's policy on these issues. Information on how to comment is set out in Section 1 of this paper.