

Consultation Response

IGT172: Provision for Gas Entry within the IGT UNC

Responses invited by: 17th April 2024

Respondent Details

Name: John Baldwin, Managing Director
Organisation: CNG Services Ltd

Support Implementation	<input checked="" type="checkbox"/>
Qualified Support	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Do Not Support	<input type="checkbox"/>

Please briefly summarise the key reason(s) for your support / opposition

There are opportunities for the proposed IGT approach to provide an additional option for biomethane developers, in particular where the route to the main gas grid is difficult with restrictions on easements. The IGT approach also offers flexibility on asset adoption and processes which may reduce costs and schedule for a new biomethane project

Authority Decision Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be an Authority Decision modification?

In our view, self-governance would have been appropriate for what is essentially an enabling modification that brings the IGT UNC in line with the UNC rather than introducing anything novel.

Please state any new or additional issues that you believe should be considered

None

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Facilitating competition between Gas Transporters impacts the relevant objectives positively. Ensuring there is consistency of obligations, with energy accounted for appropriately, when gas is injected to an IGT is consistent with efficient administration of network codes. In addition, ensuring that IGT entry is facilitated may increase the number of parties injecting gas to the GB network, and the availability of additional sources of gas facilitates competition between Gas Shippers and Gas Suppliers.

Impacts and Costs

What development and ongoing costs would you face if this modification was implemented?

CNG Services would not face any development nor ongoing costs as a result of this modification being implemented. Our view is that entry to an IGT network is already possible and this modification simply codifies the requirements to be consistent with the UNC.

Implementation

What lead time would you wish to see prior to this modification being implemented, and why?

Projects are awaiting a decision currently so implementation as soon as possible is requested.

Legal Text

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

In addition, the IGT UNC Panel are particularly interested in parties' views in respect of the commercial arrangements that would be needed as part of implementing this Modification?

IGTs that have gas injected to their networks may need to develop agreements with the parties looking to inject, and also a new form of agreement with any network they may connect to or already be connected to.

Further Comments

Is there anything further you wish to be taken into account?

Biomethane projects need innovation and competition to reduce costs. By supporting a new route to market, this modification is helpful.

Responses should be submitted by email to IGTUNC@gemserv.com