

## Consultation Response

# IGT172: Provision for Gas Entry within the IGT UNC

Responses invited by: 17<sup>th</sup> April 2024

**Respondent Details**  
 Name: Rosanna Butters, Managing Director  
 Organisation: Ceres Energy

Support Implementation	Yes	
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**

Biomethane is being injected across the GB gas grid with over 100 sites connected to Gas Distribution (DN) networks. There is potential for more biomethane (and other green gases) to be developed, but producers only have the one option of connecting to a DN. In some cases, developers have identified that delivering gas to an IGT network would be more economic than delivery to a DN. This may be, for example, because there is no suitable DNO network nearby, or because an IGT may offer a more economic and efficient solution.

The IGT approach also offers flexibility on asset adoption and processes which may reduce costs and schedule for a new biomethane project, enabling more green gas to enter the grid.

## 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?**

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?**

Ceres Energy would not face any development nor ongoing costs as a result of this modification being implemented.

## 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](mailto:IGTUNC@gemserv.com)**