

## Consultation Response

# IGT172: Provision for Gas Entry within the IGT UNC

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

### Respondent Details

Name: James Copeland

Organisation: Green Forty Development Ltd

Support Implementation	<input type="checkbox"/> 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**

The proposed IGT approach gives opportunity to provide an additional option for biomethane developers (such as ourselves), for example - when a route to the main gas grid is difficult with complications with land rights. Option to use IGT allows flexibility on asset adoption and processes which may reduce costs and programme length for new green gas injection opportunities.

As a developer GFD supports more flexibility in options and increased competition and efficiency for connection to the network. This provision could encourage the growth of the green gas sector, much needed for decarbonisation.



## 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?**

GFD would not face any costs as a result of this modification being implemented. If anything such modification could facilitate revenue generation.

## Implementation

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

Projects are awaiting a decision currently so within 3 months should be targeted for implementation (as soon as possible!).

### **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?**

Green gas and Biomethane projects will be encouraged by greater flexibility such as this modification proposed.

**Responses should be submitted by email to [IGTUNC@gemserv.com](mailto:IGTUNC@gemserv.com)**