

Consultation Response

IGT176: Changes to IGT UNC to enable UNC0887 Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS

Responses invited by: 18 August 2025

Respondent Details

Name: Sebastian Speight

Organisation: Advanced Fuel Plants Limited

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

For green gas producers, the most efficient and cost-effective approach is to use an Independent Gas Transporter (IGT) network connected to the NTS, especially when the site is far from the NTS or when there is a need to both offtake and inject gas locally.

Green gas producers are incentivised to both offtake and import gas from the NTS, and so a single bi-directional connection reduces design, material and labour costs associated with the connection.

As developers, the land area required to support two pipes is greater than a single bi-directional connection. This increases the of connection, which is inevitably borne by developers.

It is for these reasons that we are in support of this modification.

Self-Governance Statement

Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?

We support a view that self-governance should apply whenever possible so that Ofgem can focus on the most significant issues. Given the small scale of green gas flows, we do not consider this proposal is sufficiently material to warrant Ofgem involvement and that self-governance would be appropriate.

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?

Relevant Objective D.

Implementation will allow additional green gas to be produced and injected to the GB gas network. Increasing supply will support effective competition, while increasing the proportion of green gas in the network will support net zero.

The provision of a framework for IGTs to inject gas to the NTS also supports competition between networks by opening up an alternative route to market.

Impacts and Costs

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

If implemented, we would intend to use our IGT contractor to develop NTS connections which has a more efficient footprint and a reduced impact on the environment.

The lower land area also has the additional benefit of reducing costs.

Implementation

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

A number of potential projects have been identified that cannot go ahead until UNC Modification 0887 and this modification have been implemented. Financiers look for certainty before committing to projects and hence early implementation would help to unlock investment and ensure project financiers have the confidence to move ahead, supporting the UK drive to net zero. Time is especially pressing because the Green Gas Support Scheme is a key consideration for most biomethane developments. The scheme is due to close to new applicants on 31 March 2028, leaving a limited time for new developments to be built and commissioned before the scheme closes

Legal Text

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

Yes

Further Comments

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

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