

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: Tim Davis

Organisation: CNG Services Ltd

Support Implementation	☒
Qualified Support	☐
Neutral	☐
Do Not Support	☐

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

We support competitive options being available for entry to the GB gas network. In combination with UNC Modification 0887, this modification facilitates entry to the National Transmission System via an IGT, giving an additional option for entry, and notably for biomethane developers. The IGT approach potentially offers additional flexibility on asset adoption and processes, and may reduce costs and/or time schedules for some developments

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?

In our view, the criteria for self-governance were met by both UNC Modification 0887 and this modification. We do not regard it as a material change. However, given that 0887 is with Ofgem for a decision, Authority Direction is appropriate for this modification

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 Relevant Objective D 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 (RO F). 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 (RO D).

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.

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?

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@talan.com