

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: Mark Runnacles Goodridge

Organisation: Ceres Energy Limited

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

We support the modification of the IGT UNC as set out in IGT176 to work in combination with UNC Modification 0887 to facilitate entry to the National Transmission System via an IGT. The additional viability this can offer certain projects, such as biomethane producers, could be the difference between if they are viable or not. Ceres sees competitive options being available for entry to the GB gas network only benefitting the UK economy and gas industry. The additional flexibility on processes and asset adoption the IGT approach can offer could see costs and timeframes reduced in some instances.

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?

The UNC Modification 0877 and this IGT176 modification meet the criteria for self-governance and after review 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

No additional issues to consider at this point.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

Relevant Objective A

- Additional long-term sources of gas, 15+ years in the case of Green Gas Support Scheme eligible biomethane projects, entering the onshore pipe-line system will aid the efficient and economic operation of the pipe-line system.

Relevant Objective D

- Ensuring that IGT entry is facilitated could 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.
- Facilitating competition between Gas Transporters impacts Relevant Objective D positively.

Relevant Objective F

- 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.

Impacts and Costs

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

Ceres Energy would not incur 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?

As short a time as is deemed reasonable. Time is especially pressing in relation to biomethane projects because the Green Gas Support Scheme is a key consideration. 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. A number of potential projects have been identified that cannot go ahead until UNC Modification 0887 and this IGT176 modification have been implemented. Funders look for certainty before committing to projects and the early implementation would help to unlock investment and ensure project funders have the confidence to move ahead, supporting the UK drive to net zero.

Legal Text

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

We are satisfied.

Further Comments

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

Not at this time.

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