

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: Charles Steer

Organisation: Grosvenor Green Gas LTD & Grosvenor Farms LTD

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

Injection to the NTS offers significant advantages to green gas producers. For our first project the distance to the NTS and the desire to offtake as well as inject gas means that a solution involving an IGT network connected to the NTS is economic and efficient. The modification facilitates this.

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.

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 a company with an IGT Licence to develop a pipeline that connects to the NTS. The cost of managing the assets would be borne by us the users of the pipeline.

Implementation

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

The modification is important for our project, and we would appreciate approval in summer 2025 so that it does not cause delays

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