

Consultation Response

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

Responses invited by: 18th August 2025

Respondent Details

Name: Phil Lucas

Organisation: National Gas Transmission

Support Implementation Yes

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

National Gas Transmission (NGT) supports implementation of this Proposal as it would align the terms of the iGT UNC with the changes to the UNC advocated by UNC Modification Proposal 0887 ('UNC0887').

Principally, implementation of this Proposal would ensure that commercial rules for management of Supply Points on iGT pipelines that are connected to the NTS at bi-directional points (as contemplated by UNC0887) are in place.

Given this, and the anticipated use of such new connection types to enable deliveries of low carbon footprint biomethane to the gas networks, we agree that implementation would better facilitate achievement of the relevant objectives as set out in section 7 of the Draft Modification Report.

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?

NGT agrees that Authority Direction is appropriate in this case given the materiality of the changes proposed.

Please state any new or additional issues that you believe should be considered

We have not identified any such additional issues.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the Proposer's assessment of impact on the relevant objectives as set out in section 7 of the Draft Modification Report.

Impacts and Costs

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

No additional costs (i.e. over above those attributable to the implementation of UNC0887, should this be directed for implementation) would be incurred by NGT.

Implementation

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

No lead time (specifically attributable to this Modification) would be required.

Legal Text

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

We provided comments on draft versions of the legal text and welcome the changes incorporated in response to this feedback. We are satisfied that the final version of the text would deliver the intent of the solution.

Further Comments

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

NGT has no further comments.

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