

Final Modification Report	At what stage is this document in the process?
IGT176: Changes to IGT UNC to enable UNC0887 ‘Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS	01 Modification 02 Workgroup Report 03 Draft Modification Report 04 Final Modification Report
Purpose of Modification: This Modification identifies the requirement for and aims to make changes to IGT UNC to enable UNC0887 ‘Facilitating Bi-Directional Connections Between IGT Pipelines and the National Transmission System (NTS)’ to be implemented by including its operator, National Gas Transmission (NGT) as a ‘Large Transporter’ and to apply the core IGT concept of ‘deeming flow’ to and from the National Balancing Point (NBP), whilst replicating as closely as practicable the existing NTS ‘direct connect’ exit and entry arrangements that UNC Shippers use.	
	Panel considered this Modification on 29th August 2025. The Panel recommends unanimously that this Authority Determined Modification Proposal should be implemented.
	High Impact: <u>Developers</u> of gas production facilities for whom delivery to/from the NTS via an IGT network is optimal, <u>Pipeline Operators</u> that accept delivery of gas to their network(s)
	Medium Impact: None
	Low Impact: Large Transporters and Pipeline Users

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Any questions?

Contact:

Code Administrator



IGTUNC@talan.com



02070901044

Proposer:

Nick King – CNG Services Ltd



nick.king@cngservices.co.uk



0121 247 8160

Timeline

Modification timetable:

Modification raised	19 th March 2025
Initial consideration by Workgroup	10 th April 2025
Workgroup Report presented to Panel	25 th July 2025
Draft Modification Report issued for consultation	28 th July 2025
Consultation Close-out for representations	18 th August 2025
Final Modification Report available for Panel	22 nd August 2025
Modification Panel decision	29 th August 2025
Modification issued to Authority	2 nd September 2025

1 Summary

What

Today, UNC Independent Gas Transporters Arrangement Document (IGTAD) provisions apply only between IGTs and Distribution Network Operators (DNOs), with NGT's NTS being outside its scope. Similarly, IGT UNC applies only to conveyance of gas to/from DNOs and IGTs. [UNC0887](#) intends to remedy this by changing UNC IGTAD from currently being applicable to only Distribution Network Operators and IGTs, to include NGT as operator of the NTS. This would provide a foundation for NGT's to offer services as a 'Large Transporter' to IGTs.

Whilst IGT UNC, post [IGT172](#), includes provisions that are appropriate for direct entry of gas to an IGT network and onto the NTS without change, as UNC Transportation Principal Document (TPD's) provisions for gas to consumers differs between Local Distribution Zone (LDZ) and NTS Supply Points, and IGT UNC replicates only LDZ Supply Point provisions (there never having been a need to replicate NTS), IGT UNC is silent on how gas flowing from the NTS to an IGT network and onward to consumers could be treated.

At first glance UNC0887 may appear to only directly prescribe a couple of instances where IGT UNC may require change, however its stated purpose of 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS' is based on the arrangements between Transporter and Shipper being the same whether direct connect or via IGT, so it indirectly drives a need for NTS direct connect Supply Point administration to be added to the IGT UNC. For example, a key element is that IGT NTS exit points should be treated as Class 1 'non-Central Switching Service (CSS)', as that is how NTS direct connects are treated, however whilst IGT-UNC has the concept of Class 1 which replicates UNC provisions, it does not replicate the UNC's 'non-CSS' arrangements. A few relatively minor amendments to replicate this and other UNC provisions are also required. This Modification Proposal seeks to remedy this and to enable the implementation of UNC0887.

Why

A number of developers, due to their potential project's geographical location, are looking at injecting new biomethane gas from anaerobic digester (AD) plants to potential IGT networks that would be connected to the NTS, creating the requirement to flow gas from an IGT to the NTS. Similarly, some developers require connections to the IGT network that offtakes gas.

How

NGT has raised UNC0887 to add provisions to the UNC, principally covering:

- Point Definition (including NTS exit being 'Class 1' and 'non-CSS')
- NTS Access: NTS Entry and NTS Exit Capacity
- Measurement and Energy Balancing
- NGT Transportation Charges.

IGT176 is proposed to marry this by codifying arrangements between Pipeline Users and Pipeline Operators to make the Cross Code arrangements work.

The main proposal is to incorporate into the IGT UNC, the UNC's 'non-CSS' provisions, with minor associated additions and consequential changes to other existing IGT UNC Parts where they are needed.

2 Governance

Justification for Authority Direction procedures

This Modification is a marry to UNC0887, with the overarching objective that they work together to allow new sources of gas into and out of the Total System through a new, additional route. The Modification is particularly aimed at allowing increased volumes of biomethane and other green gases to be injected.

The UNC Modification Panel determined that UNC0887 is a material change that warrants an Authority decision, so this Modification should follow the same governance, ideally with the two being considered together by the Authority.

Proposer's requested next steps

This Modification should:

- be considered a material change and not subject to Self-Governance; and
- be assessed by a Workgroup before proceeding to Consultation.

Workgroup discussions and conclusions (July 2025)

The Code Administrator asked the Workgroup to consider whether this Modification should be an Authority Direction Modification Proposal, referencing the Proposer's rationale above.

A member asked for clarification with regards to the progression of IGT176 and whether there needed to be a decision on UNC0887 before proceeding to consultation. The Code Administrator advised that all Cross-Code impacting Modifications are considered and decided on by the Authority at the same time. Whilst Code bodies, Workgroups and Panels will consider the Modification against the Relevant Objectives and benefits/disbenefits to industry, the Authority has a wider remit and will need to look at the end-to-end governance. UNC0887 was submitted to the Authority at the end of June 2025 and whilst work may have commenced in the background on that Modification, the Authority will not make a decision on the UNC Modification until they have received and considered IGT176. The Ofgem representative agreed with this view. The member had no further comments.

The Workgroup unanimously agreed that IGT176 should continue to be progressed as an Authority Direction Modification Proposal.

Panel initial views (July 2025)

The Code Administrator took the Panel through the Proposer and Workgroup's views on governance. The Panel unanimously agreed with the Workgroup and the Proposer that this Modification should continue to be treated as an Authority Direction Modification Proposal, for the same reasons cited above.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that this Modification should continue to be treated as an Authority Direction Modification Proposal.

3 Why Change?

Overview

General

IGT UNC today comprises a collection of provisions between DNOs (defined as 'Large Transporters') and Shippers and only contains provisions relevant to DNOs. It is silent on NTS as NGT is not, and was not, intended to be a party.

Under UNC0887, IGTAD is proposed to be changed from being a collection of provisions between DNOs (defined as 'Large Transporters' in IGT UNC) and IGT Users, to their being binding on an expanded definition of 'Large Transporters' comprising DNOs, and NGT as operator of the NTS.

IGTAD	
"Section A – Scope and Classification	
1	Introduction
1.1	Independent Gas Transporter Arrangements Document
1.1.1	<i>The Independent Gas Transporter Arrangements Document sets out:</i>
(a)	<i>rights and obligations as between DN Operators and Independent Gas Transporters in relation to the connections between their respective DNO Systems and IGT Systems;</i>
(b)	<i>rights and obligations as between National Gas Transmission and Independent Gas Transporters in relation to the connections between the NTS and IGT Systems; and</i>
(c)	<i>the basis of implementation of certain provisions of the Transportation Principal Document in relation to CSEP System Exit Points, USEP System Entry Points and IGT LDZ System Entry Points."</i>

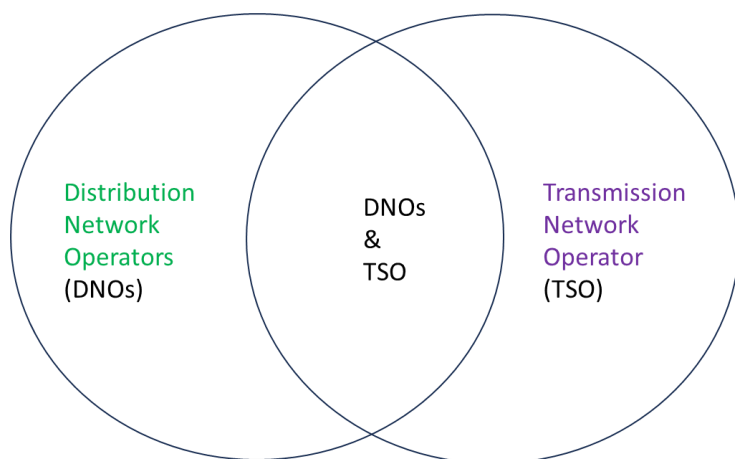
Excerpt from UNC IGTAD Section A

If IGT UNC is to remain compatible with UNC, a first step is that relatively minor definitional changes to include NGT as a 'Large Transporter' alongside DNs are required.

IGT UNC Part N 1.2.1 (b), referred to above, would also require a minor change, as DNO and NGT Licence Conditions differ, A15 being the NTS equivalent on the DNO's A15A.

Further to the above example, various amendments will be needed to identify and clearly indicate provisions:

- a) that should be restricted to DNO only (as they are not relevant to NTS exit);
- b) that should apply equally to DNOs and NGT in their capacity as 'Large Transporters'; and
- c) that need to be introduced to apply to NTS only.



Entry

In respect of new entry of gas to the NBP via an IGT pipeline, UNC0887 proposes replicating the core provisions set out under [UNC0842 'Gas Entry onto the Total system via an Independent Gas Transporter'](#), with a relatively small number of changes to reflect the differential treatment of NTS entry compared to DN/LDZ entry in UNC TPD (most notably in respect of UNC capacity).

For brevity, the UNC specific detail around this has not been duplicated here but can be found in the UNC887 proposal and its associated Modification Report.

As UNC0887 follows UNC0842 by only a few months and UNC0842 was drafted to be sufficiently flexible to include future NTS entry, the IGT UNC changes to make the entry element of the Cross Code solution work are straightforward.

Exit

'Introduction to the IGT UNC' page 1 states:

"To make the industry as efficient as possible, the IGTs have adopted, wherever relevant, the same processes as those operated by the Large Transporters. The outcome of this change is that all Gas Shippers can be confident that, in general, the way they manage the transporter interaction for retail consumers, will be carried out in an identical manner irrespective of whether that consumer is located on a Large Transporter network or an IGT network."

A key requirement of UNC0887 marry is therefore that Shipper interactions regarding Supply Point arrangements for indirectly connected NTS are to be treated identically to directly connected equivalents.

UNC0887 proposed legal drafting (IGTAD Section D 2.1.4) emphasises this by stating that 'an IGTs Supply Meter Point on an NTS-Connected IGT System must be classified as Class 1'.

Existing UNC TPD states that NTS direct connects are 'non-CSS':

UNC TPD Section G (as is)

1.2.2 All LDZ Supply Meter Points, except for LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are CSS Supply Meter Points; and **all NTS Supply Meter Points, LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are Non-CSS Supply Meter Points.**

Excerpt from UNC TPD Section G

UNC TPD has two defined terms that expand upon it and are used in the Section:

UNC TPD Section G (as is)
1.2.1 ... " (e) a “Non-CSS Supply Meter Point” is a Supply Meter Point which is not a CSS Supply Meter Point; (f) a “Non-CSS Supply Point” is a Supply Point which comprises a Non-CSS Supply Meter Point; “ ...

Excerpt from UNC TPD Section G

IGT UNC Part CI does not use the UNC’s concept of ‘non-CSS’ and omits replication of 1.2.1 (e) and (f) above.

Instead, IGT UNC Part CI has the following, which is incompatible with UNC 887:

IGT UNC Part CI
1.5 The REC, and CSS Supply Points For the purposes of the Code: ... (f) <u>All Supply Meter Points are CSS Supply Meter Points.</u>

Excerpt from IGT UNC Part CI

The above is a selection of non-exclusive examples that illustrate the need for change. Section 5 of this document (Solution) expands on these and the proposed solution.

4 Code Specific Matters

Technical skillsets

None specifically, although an understanding of how LDZ gas entry works in UNC and provisions in both Codes concerning operator to operator agreements would be helpful across the UNC and IGT UNC.

Reference documents

Industry codes

[IGT UNC](#)

[UNC IGTA](#)

[UNC TPD](#) Section G, as it applies directly to NTS direct connects and indirectly through pointing in IGTUNC (this Modification Proposal has focus on Clause 6 and associated 'non-CSS' provisions)

UNC Modifications referred to in the proposal

[UNC0887 – 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS'](#)

[UNC0842 – 'Gas Entry onto the Total system via an Independent Gas Transporter'](#)

[IGT172 - 'Provision for gas entry within the IGT UNC'](#)

5 Solution

Summary of proposed solution

UNC887 seeks to make changes to UNC IGTA and will include definitional changes, treatment of and charging for NTS capacity and use of system for the NTS, measurement and energy balancing.

This IGT UNC Modification consists of elements, which will complete the marriage of IGT UNC to UNC0887, with the overarching objective that the two Codes work together when gas enters directly into an IGT network and is transported to a Large Transporter System.

The examples in Section 3 'Why Change' indicate that key features of the IGT176 solution are:

- Minor definitional changes to include, but are not limited to adding NGT as a 'Large Transporter' alongside DNOs;
- Replication of the UNC's 'non-CSS' provisions so that Supply Point Administration (SPA) for indirectly connected NTS exit is treated identically to direct connect equivalents;
- In accordance with UNC0887 legal drafting proposed addition IGTA Section G4, adding the right for an IGT to insist on an equivalent to a Network Exit Agreement (NExA); and
- Introduce in IGT UNC, non-charging related provisions similar to the ones applicable to NTS entry in UNC TPD Section J, to apply to Pipeline Operators and Pipeline Users, when gas is entered directly into an IGT network from a gas delivery facility, for onward conveyance to the NBP via the NTS.

The following sub-headed topics provide initial thoughts on how the examples in Section 3 'Why Change' could be addressed. This illustrates the proposed approach and the relative simplicity of change, although the number of changes may be quite high in number.

Adding NGT alongside IGTs and DNOs within IGT UNC

As outlined in Section 3 'Why Change' under UNC0887, IGTA is proposed to be changed from being a collection of provisions between DNOs (defined as 'Large Transporters' in IGT UNC) and IGT Users, to their being binding on an expanded definition of 'Large Transporters' comprising DNOs, and NGT as operator of the NTS.

If IGT UNC is to remain compatible with UNC, a first step is that relatively minor definitional changes to include NGT as a 'Large Transporter' alongside DNs are required as shown below:

IGT UNC “PART M – DEFINITIONS (as is)	
The following definitions shall apply:	
"Large Transporter" <i>National Grid Gas plc and/or as the context permits the DN Operator which operates the pipeline system immediately upstream of the CSEP;</i>	References to ‘National Grid Gas plc’ would appear to be intended to apply to Cadent, however fortuitously, if it was to be changed to ‘National Gas Transmission plc’ it would work
"Large Transporter CDSP Licence Condition" <i>shall have the meaning in Part N 1.2.1(b);</i>	See comment on Part N below
"Large Transporter System" <i>the main pipeline systems operated by National Grid Gas plc and the DN Operators the conveyance of gas through which is authorised by one or more gas Transporter Licences;"</i>	See comment on ‘Large Transporter’ definition above

Excerpt from IGT UNC Part M

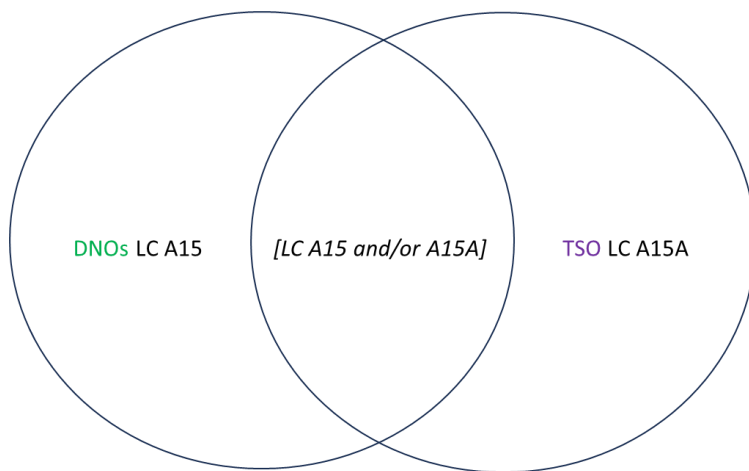
Amending the DNO Licence Condition reference in IGT UNC to also incorporate the TSO equivalent

IGT UNC Part N 1.2.1 (b), referred to in the diagram above, would also require a minor change, as DNO and NGT Licence Conditions differ, A15 being the NTS equivalent on the DNO’s A15A.

IGT UNC PART N – CDSP AND UK LINK (as is)	
1 GENERAL	
1.2 Interpretation	
1.2.1 For the purposes of the Code:	
(a) <i>the "Central Data Services Provider" or "CDSP" is the person for the time being appointed by the Large Transporters as central data services provider pursuant to the Large Transporter CDSP Licence Condition;</i>	
(b) <i>the "Large Transporter CDSP Licence Condition" is Standard Special Condition A15A of Gas Transporter's Licences;"</i>	

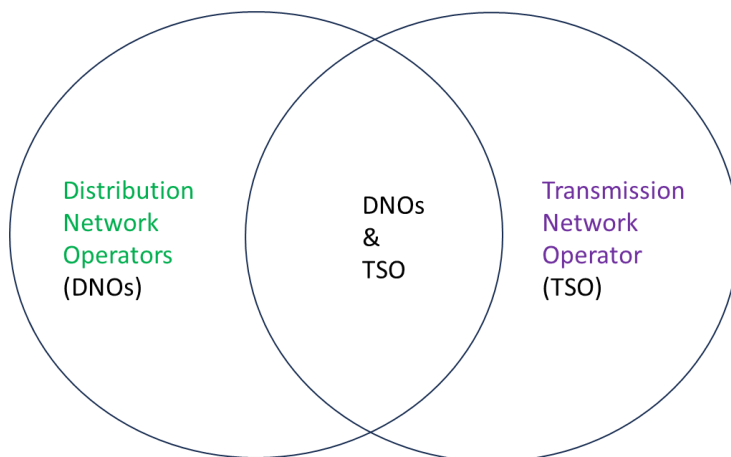
Excerpt from IGT UNC Part N

This could easily be accommodated by the addition of ‘and/or A15’ at the end, but this is only a simple example of a wider need for the same approach throughout IGT UNC. The diagram below illustrates NGT being shown as TSO:



As described in Section 3 'Why Change' of this document, various amendments will be needed to identify and clearly indicate provisions:

- d) that should be restricted to DNO only (as they are not relevant to NTS exit);
- e) that should apply equally to DNOs and NGT in their capacity as 'Large Transporters'; and
- f) that need to be introduced to apply to NTS only:



Entry

Minor consequential changes are required to IGT UNC Part Q to knit together existing provisions with the proposed new content.

Exit

Ensuring harmonisation of treatment of NTS pressure administration between UNC and IGT UNC

As described in Section 3 'Why Change' of this document, IGT UNC Part CI does not use the UNC's concept of 'non-CSS' and omits replication of 1.2.1 (e) and (f) above.

Instead, IGT UNC Part CI 1.5 has provisions which are incompatible with UNC0887.

This is easily remedied though the deletion of IGT UNC Part CI Clause 1.5 (d) in Section 3 ‘Why Change’ as above, and replacing it with a modified version of UNC TPD Section G 1.2.1(h) as below (replicated, with change, additional UNC TPD Section G wording):

IGT UNC Part CI (proposed)
1.5 The REC, and CSS Supply Points <i>For the purposes of the Code:</i> <i>(ff) <u>UNC TPD Section G 1.2.2 shall apply with the following changes: The words ‘LDZ Supply Meter Points, except for LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points are CSS Supply Meter Points; and all’ and ‘LDZ Shared Supply Meter Points and Unlicensed Supply Meter Points’ shall not apply”</u></i>

Excerpt from IGT UNC Part CI as proposed

Replication of additional UNC Section G wording:

IGT UNC Part CI (proposed)
1.5 The REC, and CSS Supply Points <i>For the purposes of the Code:</i> <i>(d) a <u>“Non-CSS Supply Meter Point” is a Supply Meter Point which is not a CSS Supply Meter Point;</u></i> <i>(e) a <u>“Non-CSS Supply Point” is a Supply Point which comprises a Non-CSS Supply Meter Point;</u></i>

Excerpt from IGT UNC Part CI as proposed

Further consequential changes are required to IGT UNC Q to knit together existing provisions with the proposed new content, perhaps the one requiring the most words is to reinstate all relevant ‘non-CSS’ mentions in UNC TPD Section G that are currently ‘turned off’ in Part CI.

Workgroup discussions (May 2025)

The Proposer provided an overview of the Modification to the Workgroup, advising that the purpose of the Modification is to support the delivery of UNC0887. They took the Workgroup through the following areas of the IGT176 solution:

- Minor definitional changes to include, but are not limited to adding NGT as a ‘Large Transformer’ alongside DNOs;

- Replication of the UNC's 'non-CSS' provisions so that Supply Point Administration (SPA) for indirectly connected NTS exit is treated identically to direct connect equivalents;
- In accordance with UNC0887 legal drafting proposed addition IGTAD Section G4, adding the right for an IGT to insist on an equivalent to a Network Exit Agreement (NExA); and
- Introduce in IGT UNC, non-charging related provisions similar to the ones applicable to NTS entry in UNC TPD Section J, to apply to Pipeline Operators and Pipeline Users, when gas is entered directly into an IGT network from a gas delivery facility, for onward conveyance to the NBP via the NTS.

The Proposer asked how parties work within individual Code documents under the UNC. The Chair confirmed that the UNC has Shippers, Large Transporters and IGTs as parties to the whole of the UNC. However, not every party is required to do everything in every part of the Code. The IGTAD for example, is very specifically focused on what Large Transporters need from IGTs to ensure the integrity of the network.

The Proposer advised that the intention of UNC0887 is to include NGT as a relevant party to the IGTAD under the definition of Large Transporters. The Chair asked for confirmation of whether NGT, if being added as a party to the IGTAD, will now have requirements of IGTs which all IGTs then have the responsibility to deliver against if participating in the solution. The Proposer confirmed that this was the case and noted that the obligations will only apply to the extent to which an IGT chooses to directly connect to the NTS. Nothing is intended to affect any distribution connected IGT.

How this Modification differs from IGT172

A Workgroup member asked what the difference was between this Modification and [IGT172 - Provision for gas entry within the IGT UNC](#).

The Code Administrator advised that IGT172 allowed for an IGT to connect directly to a GDN. In the case of IGT176, the Modification is looking to allow an IGT to connect directly to the NTS, but the connection will be unmetered, unlike the GDN connection.

The Chair added that IGT172 did not have any implications for sites downstream of a GDN connection. However, this Modification is incorporating instructions and requirements for any Supply Points connected downstream of the NTS connection point.

There were no further questions raised.

Impacts on Shippers

The Proposer was asked whether the obligations being introduced into the IGT UNC will impact IGTs or Shippers as well. The Proposer advised that it impacts both IGTs and Shippers, but only where there is an IGT directly connected to the NTS.

A Workgroup member asked how Shippers will be impacted. The Proposer advised that it will only be the Shipper that will want to have either a gas entry point on a directly connected IGT network or to ship gas to an exit point off a directly connected IGT network. They imagine that any Shippers interested in this will be interested from the start as the driver will either be a very large gas consumer connection requirement or perhaps an anaerobic digestion connection. They advised that they cannot imagine any IGT wanting to do a speculative development of a directly connected pipeline.

They added that this Modification would allow for a scenario where there is a new large industrial load situated close to the NTS, but far away from a GDN. This means that, where previously a consumer may have considered a direct NTS connection, they might now consider connecting to an IGT that is then connected to the NTS.

The Code Administrator confirmed that from the Shipper's point of view, a Shipper looking to purchase biofuel and putting it into the network will be interested in terms of how they get that gas into the network at that a specific point. The Shipper will also be interested should it want to supply any of the sites downstream of that connection.

There were no further comments raised.

Non-standard sites and switching

The Chair noted that there may need to be consideration at some point regarding nested Connected System Exit Points (CSEPs) but perhaps not something that can be answered now. They asked further about whether the downstream sites will be metered. The Proposer advised that there will be intersystem off take meters. They also noted that under IGT176, Supply Points downstream of the NTS will be considered non-standard sites and will need to be Class 1. The Proposer shared the CDSP non-standard sites administrative process Shipper Guide showing how NTS exit works for a Shipper and noted that there is a similar guide for NGT too.

The Chair asked why NGT are wanting the sites downstream of this connection to be non-standard sites, as the IGT UNC are having to introduce a new type of switching service for these sites as they are non-CSS. They noted that a decision was made at some point that it is better to put the telemetry on the individual sites downstream without knowing the quantity of those sites, rather than putting the telemetry in at the IGT-NTS boundary. It would be useful to understand why and how it was concluded that this was the best way forward.

The Proposer provided a general overview of some of UNC TPD G6, which sets out the current non-CSS requirements. They advised that the IGT network connected to the NTS will need to be maintained at the NTS pressure. The Chair felt that this was a reasonable explanation and that it was helpful to understand that anything connected to the NTS will be at a high pressure.

The Chair asked the Proposer how likely it might be that the non-standard switching might be used. They also asked the Central Data Service Provider (CDSP) representative what the current population of non-standard sites currently is. The CDSP advised that they were unsure of the current number but would take that away and confirm ahead of the next meeting.

The Proposer advised that NGT do publish a report that sets out the number of directly connected sites. Based on the current transmission charging statement, there over a hundred NTS to DNO connected sites with a few dozen individually named sites.

Legal drafting

The Chair asked if the Proposer intends to do the legal drafting, to which they responded and confirmed that they do plan on doing the legal drafting and have provided an initial draft ahead of this meeting to the Code Administrator who has written the drafting into the usual template and format.

The Proposer took the Workgroup through the current version of the legal drafting. The Code Administrator provided an overview of the approach taken by the Proposer, noting that they have elected to update existing definitions, add in required new definitions as well as lift and shift some UNC text into the new proposed Part R rather than cross-referencing. They added that the Proposer has also chosen to keep the numbering as close the UNC as possible which is why there may be references within paragraphs that note "not in use".

The Proposer stepped through their drafted changes, advising first that they had missed off a required provision relating to TPD Section G6 but that this will be added into the next iteration of the drafting.

The Chair referenced the current drafting approach taken by the Proposer and noted that if NGT wanted to change the requirements under the UNC in future, those changes would not be reflected in the IGT UNC as NGT cannot raise changes in the IGT UNC. The Proposer asked whether any changes needed to IGT UNC would be added to the list of required change. The Code Administrator advised that it would be something that would be tracked and would go under the list of UNC Modifications needing action. However, the Code Administrator cannot appoint someone to raise a Modification and NGT cannot raise changes under the IGT UNC and so there is a risk of a misalignment as we will have to rely on an IGT UNC party to raise any required Modification(s).

The Chair asked if any NExA will be required to follow the template as set out in the drafting. The Proposer advised that it will but noted that it is a very high level and very open set of provisions. It's the same concept as Part Q that was introduced under IGT172. The template will be given to the potential connected consumer and the DN will approach them and agree the NExA based on the template, but the specifics go into that agreement and operate outside of code. They noted, for example that the pressure is simply added to that document as required under Code. However, TPD Section J says simply says what the process is for changing the pressure and how that should be dealt with. That does not change the agreement itself, and they would expect NGT would contact any IGT regarding any impacts and to request that the IGT pick these up.

The Chair suggested that this approach implies that the IGT should be adhering to the NExA under the UNC and so there is a question of how IGTs are going to be able to advocate for themselves. The Proposer referenced IGTAD Section D and advised that it says that IGTs shall adopt, by means of the IGT UNC, to implement the rules and processes which are the same as those from time to time of the TPD. The UNC0887 proposer has used the existing vehicle in the IGTAD to ensure that the Codes remain aligned.

The Code Administrator advised that there are a significant number of changes in the IGTAD. They noted that the Code Administrator has gone through the changes from a consequential impacts perspective, and there is nothing specific at the moment that needs to be amended. However, they will complete a full review to ensure that there are no numbering or reference changes outside of what IGT176 is proposing as we might need to include some additional updates to accommodate the UNC0887 changes to existing text.

The Chair asked if the whole of IGTAD can now apply to NGT or not. The Code Administrator advised that UNC0887 does a good job at splitting things out and ringfencing provisions that do / do not need to apply to NGT.

The Code Administrator recommended that IGTs/Shippers should review the UNC0887 drafting to ensure that it fits for their business regardless of IGT176. The Proposer advised that the UNC0887 proposer took great lengths to ensure that there were no unintended consequences.

Workgroup discussions (June 2025)

Differences between direct NTS connections vs GDN connections

A member asked for clarification regarding how the obligations for IGTs connecting to the NTS differ compared to what is currently required of GDNs.

The Code Administrator reiterated discussions from last month and also advised that it is the Proposer's intent to keep the obligations the same for IGTs as they are for GDNs when it comes to NTS connections. The Proposer provided some historical context, noting that connections to the NTS have been available under the Network Code regime since it was introduced. However, the IGT UNC has not allowed it from a

Code perspective and the IGTAD, prior to UNC0887 has only been relevant to Large Transporters and IGTS. However, post IGT176 and UNC0887, NGT will fall under the Large Transporter definition with regards to IGT networks connected to the NTS and will make the IGT process the same as the established process for GDNs. The member thanked the Proposer and advised that it was useful context.

The Chair asked for confirmation of may vary between an IGT-NTS and IGT-GDN connection. The NGT representative advised that the provisions under UNC0887 will supplement the IGT-GDN connections process with what is needed between the relevant IGT and the NTS and establish exit provisions for IGT-NTS connections. At the moment they cannot clarify the full extent of a NExA agreement, but it will include terms for offtake.

The Chair asked NGT if, where a GDN to IGT connect would have a metered point, the NTS to IGT connection will not have a metered point. The NGT representative agreed with this view.

Legal drafting

The Proposer took the Workgroup through the updated legal drafting. Detailed discussions on the legal drafting can be found in Section 9 of this document.

Workgroup discussions and conclusions (July 2025)

Content of the Workgroup Report

The Workgroup considered the content of the Workgroup Report. The Code Administrator asked the Workgroup if they were happy that the discussions for May and June 2025 were accurate and reflective. They also asked members to consider whether any areas of discussion needed revisiting. The Code Administrator made a reference to the discussions on the differences between direct NTS connections vs GDN connections as an example.

The Proposer noted a minor typographical error where 'regimen' needed correcting to 'regime'. The Code Administrator confirmed that this update would be made.

The Workgroup agreed unanimously that the discussions for May and June 2025 were accurate and reflective and there were no areas of discussion that needed revisiting.

Legal drafting

The Code Administrator and Proposer took the Workgroup through the updated legal drafting. Detailed discussions on the legal drafting can be found in Section 9 of this document.

Conclusions

The Workgroup considered the solution and previous discussions. The Code Administrator asked the Workgroup whether the solution delivers the intent of the Modification and if any further work is required.

A member responded noting the previous discussions and they agreed that the solution does deliver the intent, and they had nothing further to add. Other members agreed with this view.

The Workgroup unanimously agreed that the solution delivered the intent of the Modification, and no further work is required.

Panel initial views (July 2025)

The Code Administrator took the Panel through the Workgroup discussions and conclusions with regards to the solution. It was highlighted that one of the significant aspects of the solution was that IGT176 would

reintroduce switching, but only for the non-CSS unique sites through any IGT-NTS connection. These will not fall under the UNC like CSS switching and will instead be managed manually via another mechanism under the IGT UNC. The Chair asked if Panel members had any questions with regards to this or the Solution as presented.

The Panel acknowledged the information provided by the Code Administrator and the Workgroup Report completed by the Workgroup and had no further comments.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that there were no new issues raised that required consideration by the Workgroup and no further work was required on the solution.

6 Impacts & Other Considerations

Does this Modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No. There is no identified impact on SCRs or other significant industry change projects.

Workgroup discussions and conclusions (July 2025)

The Code Administrator asked the Workgroup to consider whether this Modification would have an impact on any SCRs or other significant industry change projects.

The Code Administrator noted that Code Reform is considered a significant industry change project but the timescales of this are unknown. Adding that they do not see there being any direct impact, but the Authority should consider this when assessing the Modification.

The Workgroup agreed unanimously that this Modification will not directly impact any SCR or significant industry change project.

Panel initial views (July 2025)

The Code Administrator noted the Workgroup discussions regarding SCRs and significant industry change, noting that the Workgroup agreed that there would be no impact to either.

The Panel unanimously agreed with the Workgroup's view that there should be no impact on any SCRs or significant industry change projects.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that this Modification should have no impact on any SCRs or significant industry change projects.

Consumer impacts

What is the current consumer experience?

Minor. The changes proposed here constitute commercial rules to apply at a new type of inter-Transporter point of connections including arrangements which ensure gas is fully accounted for when

entering and exiting the GB network. However, if this means that additional gas enters the network, and particularly green gas, there would be marginal consumer benefits. Diversification of GB domestic gas sources will have a positive impact on Security of Supply.

What would the new consumer experience be?

At present, neither the UNC nor the IGTUNC contemplate bi-directional connections between the NTS and IGT Pipelines which deliver gas to, and offtake gas from, the NTS in the manner set out in UNC0887 and this Proposal. If the two proposals are implemented, the two Codes would be explicit in defining such points of connection (to the NTS) and the associated commercial arrangements, which will ensure effective integration into the prevailing regime. This will provide clarity for all stakeholders (including consumers) on the applicable arrangements. This Modification will result in increased injection to the grid of Biomethane which helps towards Net Zero targets.

Impact of the change on Consumer Benefit Areas

Area	Identified Impact
Improved safety and reliability Proposer's Rationale No Change as the new sources of gas would not materially improve the security of supply.	None
Lower bills than would otherwise be the case Proposer's Rationale No change as the additional sources of gas would not be material in volume.	None
Reduced environmental damage Proposer's Rationale A growing number of Biomethane producers want to inject green gas onto the Total System, this Modification allows this to take place and will expand this market which will have a positive impact on Greenhouse Gas Emissions by allowing Pipeline Operators to provide this facility.	Positive
Improved quality of service Proposer's Rationale No change identified.	None
Benefits for society as a whole Proposer's Rationale To the extent that some additional consumers connect to the GB gas network, there would be a marginal benefit with the potential for cost reductions and job creation. Plus, jobs would be created at new gas production facilities, and new gas production facilities would reduce energy imports to the extent that additional green gas is injected.	Positive

Workgroup discussions and conclusions (July 2025)

The Code Administrator took the Workgroup through the Proposer’s views regarding consumer impacts and their rationale for a positive impact against “Benefits for society as a whole” and “Reduced environmental damage”.

A member noted that they agreed with the Proposer’s rationale and it, as well as the benefits reflected above, aligned to UNC0887 which this Modification is enabling. Other members agreed with this view.

The Workgroup unanimously agreed that IGT176 will have a positive impact on consumers with regards to “Benefits for society as a whole” and “Reduced environmental damage”, in line with the Proposer’s rationale as set out above.

Panel initial views (July 2025)

The Code administrator took the Panel through the Proposer and Workgroup’s views regarding consumer impacts.

The Panel unanimously agreed with the Workgroup’s view that there would be a positive impact on “Benefits for society as a whole” and “Reduced environmental damage”. The Panel had no further comments.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that this Modification would have a positive impact on “Benefits for society as a whole” and “Reduced environmental damage”.

Cross-Code impacts

Proposer’s views

Almost all the requirements for gas entering and exiting an IGT network to make UNC0887 work are already covered, including recent IGT UNC changes introduced by [IGT172 – Provision for gas entry within the IGT UNC](#), which was implemented on 12th August 2024.

Analysis of the drafting of legal drafting for UNC0887, which is in the final stages of Workgroup development, identified that a small number of additional mirrored arrangements are required in the IGTUNC; This Modification Proposal aims to provide these. A key example is the introduction of switching rules for non-CSS sites in the IGT UNC.

UNC	☒
REC	☐
Other	☐
None	☐

Workgroup discussions and conclusions (June 2025)

Central Data Services Provider (CDSP)

The Code Administrator informed the Workgroup that they had reached out to the CDSP prior to the June Workgroup meeting. They asked the CDSP to consider the drafting approach and the intent of IGT176 and confirm whether a Rough Order of Magnitude (ROM) would be required.

The CDSP confirmed that, as IGT176 is an enabling Modification, any system changes and costs would be associated with UNC0887.

The Code Administrator advised the Workgroup that, should members be interested, the latest ROM can be found on the [UNC0887 webpage](#). The Workgroup had no comments with regards to CDSP impacts.

Cross-Code impacts

The Code Administrator asked the Workgroup to consider potential Cross-Code impacts. Noting that there is no direct impact on the UNC as a result of IGT176. However, it should be noted that UNC0887 does have a dependency on both the UNC and IGT UNC Modifications being implemented at the same time.

The National Energy System Operator (NESO) representative advised that they agreed with the Code Administrator's assessment, and that IGT176 will not have a direct impact as it is only enabling UNC0887. However, they suggested that the UNC box be ticked to reflect the connection and dependencies between the two Modifications.

The Workgroup unanimously agreed that there are no direct impacts on the UNC but there are dependencies with regards to implementation. As a result, the box in the table above has been ticked.

Panel initial views (July 2025)

The Code Administrator took the Panel through the Proposer and Workgroup's views regarding impacts and costs, as well as CDSP considerations. The Panel unanimously agreed that there should be no direct impact on other Codes. They also acknowledged the connection and dependency between UNC0887 and IGT176. The Panel had no further comments.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that there should be no direct impact on other Codes. They also acknowledged the connection and dependency between UNC0887 and IGT176.

Environmental impacts

Producers cannot flare biogas other than for safety reasons and so they need the gas grid to have capacity for 100% of the time. There are good sources of feedstock that may not be near the existing gas grid but are suitable for AD but need a connection pipeline, typically at LTS pressure which is high capex. This Modification would allow such projects to use an IGT network and will expand this market which will have a positive impact on Greenhouse Gas Emissions by allowing Pipeline Operators to provide this facility.

Workgroup discussions and conclusions (July 2025)

The Code Administrator asked the Workgroup to consider the environmental impacts of IGT176, noting that the proposer cited a positive impact.

A member advised that they agreed with the Proposer's rationale, and it aligned to UNC0887, and had nothing further to add. Other members agreed with this view.

The Workgroup unanimously agreed that there would be a positive environmental impact as a result of IGT176, as set out in the Proposer's rationale above.

Panel initial views (July 2025)

The Code Administrator took the Panel thought the Proposer and Workgroup's views regarding environmental impacts. The Panel unanimously agreed with positive impacts cited by the Proposer and the Workgroup and had no further comments.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that there would be positive environment impacts, as cited by the Proposer and the Workgroup.

7 Relevant Objectives

Impact of the Modification on the Relevant Objectives:	
Relevant Objective	Identified impact
(A) Efficient and economic operation of the pipe-line system	Positive
(B) Co-ordinated, efficient and economic operation of (i) the combined pipe-line system; and/or (ii) the pipe-line system of one or more other relevant gas Transporters	Positive
(C) Efficient discharge of the licensee's obligations	None
(D) Securing of effective competition: (i) between relevant Shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation agreements with other relevant gas Transporters) and relevant Shippers	Positive
(E) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers	None
(F) Promotion of efficiency in the implementation and administration of the Code	None
(G) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Cooperation of Energy Regulators	None

Proposer's view

(A): The proposed new IGT network entry service will enable more connections of low carbon footprint biomethane, and the increased competition in routes for such green 'gas to grid', together with increased diversity in supply, will enhance the economic and efficient operation of the pipeline.

(B): By enabling a new IGT network entry service that is based on and dovetails with the established UNC equivalent, this Modification provides consistency throughout both the UNC and the IGT UNC.

(D): Is positively impacted because facilitating gas entry increases supply and hence the potential for facilitating effective competition among Shippers and Suppliers. Ensuring there are appropriate arrangements for all entry options facilitates competition between Gas Transporters.

Workgroup discussions and conclusions (July 2025)

The Code Administrator asked the Workgroup to consider views against the Objectives, including the Proposer's rationale, as set out above. The Code Administrator also invited views on other Objectives not highlighted by the Proposer.

The NESO representative agreed that there is a positive impact on the Objectives as cited by the Proposer. Other members agreed with this view, with a member noting specifically the positive impact to (D) and how enabling effective competition was useful.

The Workgroup unanimously agreed that IGT176 will have a positive impact on Objectives (A), (B) and (D) in line with the Proposer's rationale above.

Panel initial views (July 2025)

The Code Administrator took Panel through the Proposer and Workgroup's views regarding impacts on Objectives. The Panel considered the above and unanimously agreed that IGT176 would have a positive impact on Objectives (A), (B) and (D), in line with the rationale above. The Panel had no further comments.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that this Modification would have a positive impact on Objectives (A), (B) and (D), in line with the rationale above.

8 Implementation

Implementation approach

The Proposer and the Workgroup recommend that:

- IGT176 be implemented at the same time as UNC0887; and
- IGT176 should only be implemented if UNC0887 is implemented.

Proposer's initial recommendations

As this Modification Proposal will marry to UNC0887, implementation should be at the same time, ideally as soon as possible after an Authority Decision, as the service cannot work if either Modification is not approved.

At least one Pipeline Operator and one Shipper are keen to provide this service, with several potential Pipeline Delivery Facility Operators (mainly biomethane) with projects which would be economic if they could inject into existing IGT networks.

This Modification should therefore be implemented as soon as possible (supported by optional participation) and the arrangements outside code to support introduced similarly.

Workgroup discussions and conclusions (July 2025)

The Code Administrator suggested to the Workgroup that this Modification be implemented at the same time as UNC0887. They also suggested that this Modification should only be implemented if UNC0887 is implemented.

The NESO representative agreed with this approach, though they noted that they are not going to be directly impacted by the implementation of this Modification. Other members agreed with the approach suggested by the Code Administrator, nothing that the implementation should be aligned between the two Modifications. The CDSP representative noted that the approach suggested by the Code Administration also aligns to what is set out in the UNC0887 Final Modification Report.

The WG agreed unanimously with the suggested implementation approach and set out above.

Panel initial views (July 2025)

The Code Administrator took the Panel through the proposed implementation approach and the Proposer and Workgroup's views. The Panel considered the above and agreed unanimously with the proposed approach. The Panel had no further comments to add.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed with the proposed implementation approach.

9 Legal Text

Approach

Draft legal drafting changes were developed as part of this Modifications progression. The latest version can be found on the IGT176 webpage [here](#).

Workgroup discussions (June 2025)

The Code Administrator and the Proposer took the Workgroup through the updated legal drafting:

- **Part CI 8** – A member advised that the reference to (i) was not necessary, the Proposer agreed with this view.
- **Part CI 19** – updates to proposed changes to note the updates discussed in the last meeting and to also added in a cross reference to Part R.
- **Part CI 23** – new paragraph to introduce necessary reference to TPD Section G6. This takes the non-CSS provisions and replicates it as near as possible to what is currently required under TPD. This section is used for Supply Point transactions for NTS exit. They noted that there is a large amount of content in TPD largely because there are certain complexities from legacy activities that are not an issue for IGTs, which is why there are a number of “shall not apply” instances.

The CDSP noted the updates and that they agreed with the principle of what is being done, and the fact that this section applies to non-CSS and NTS Supply Point Offtake arrangements. They asked for confirmation of the rationale behind the referencing, specifically whether it is only because UNC0887 stipulates that these Supply Points need to be considered non-CSS NTS Supply Points, and not for any other purpose.

The Proposer confirmed that they have worded the drafting to focused on the non-CSS Supply Administration elements only. Therefore, they have excluded the areas not needed, using shared Supply Points as an example.

The Code Administrator asked whether shared Supply Points may be needed in the future, and whether there may be any interest in this. The CDSP agreed that it was better to exclude things like shared Supply Points for now, noting that if IGTs wanted this in the future it could be added in under a separate Modification. The Proposer agreed with this view, advising that they see this as a legacy activate, using the electricity industry as an example. The NGT representative noted that shared Supply Points were more about parties sharing the risks associated with very large sites. It meant that more than one Pipeline User could be registered. The IGT UNC currently allows for only one user within the Code, so unless you also seek to modify that, then it is already excluded. They noted that these are very large consumer sites and unless you have a very large power station connection via an IGT there may never be a need. The Code Administrator suggested that the drafting may be better left as is, and future Modifications could be raised to include things like shared Supply Points if there was a desire for it.

- **Part N 1.2** – The Proposer noted the addition of National Gas Transmission, to ensure it is included in decisions related to Large Transporter.
- **Part R 1.1** – The Proposer noted the introduction of the word “only” to further ringfence the provisions within this section to NTS related connections and Supply Points.
- **Part R 1.2** – The Proposer noted the change to “Registered User” rather than “Pipeline User”, siting the currently TPD Section J term as rationale.

A member raised concerns regarding the use of the term Relevant User in the IGT UNC in place of Registered User. They noted that Registered User and Relevant User are used differently in the UNC and can denote different users in different circumstances. They asked why Registered User isn’t used. The Proposer advised that the legal drafting is a lift from the relevant section of TPD, which uses the same wording for the same process.

The member asked if there is a possibility of anything details in Part R causing an issue with a Relevant User as a direct replacement for Registered User. They used the NExA as an example whereby a Shipper may not be able to agree the NExA as they are not down as the registered used yet.

TL shared TPD Section J with the Workgroup, and the Proposer stepped through the relevant areas that had been lifted and put into the IGT UNC legal drafting. The Proposer paid particular attention to Section J, 1.2.4 which states that (a) Relevant User means Registered User in relation to a Supply Meter Point or Supply Point in Section J. The Proposer added that they had omitted the bit relating to a Supply Point or Supply Meter Point as the proposed IGT UNC Part R only applies to Supply Points. The member and NGT considered the rationale and agreed that the usage of Relevant User is fine as the Proposer had limited the application and the matter was concluded.

- **Part R 3.10.2** – The Proposer provided an overview of the changes made regarding the maximum permitted rate for exit capacity for an IGT-NTS connection. They confirmed that they had lifted text from TPD Section J, 3.10.2 (b). The Chair asked whether parties obligated to with regards to exit capacity will have what they need to know and understand it.

The NGT representative advised that, under UNC0887, the Registered Pipeline User will be incentivised to book exit capacity and that this figure will be calculated and divided by 24 to

set the actual maximum rate per hour. The Chair responded asking if the IGT needs to have an agreement with the NTS on the maximum capacity, and if the IGT is then expected to manage all of the individual Supply Points on their network to ensure that capacity is not breached. The Proposer advised that the Shipper has to be aware of the NExA in place and ensure that they can comply with it. Therefore, they must ensure that maximum capacity is not breached. The Chair asked how they will know as they will not be aware of what's going on for the entirety of the network. It will be the responsibility of the IGT to monitor and make the Shipper aware. The NGT representative added that the Registered User will know the figures as they are responsible for capacity and booking this via Gemini. The Chair responded that the maximum capacity must be calculatable by the IGT UNC parties to avoid any breaches. The NGT representative clarified that TPD Section J, 3.10.2 refers to a singular Pipeline User at a singular Supply Point, not the notional connection Point. NGT and the Proposer discussed the current obligations of IGTs making gas available for offtake and how these are impacted by the proposed paragraph 3.10.2 in the new Part R. The Proposer and NGT took an action to further investigate and provide an update at the next Workgroup meeting.

The Code Administrator confirmed that an updated version of the legal drafting would be provided ahead of the next Workgroup meeting.

Workgroup discussions and conclusions (July 2025)

The Code Administrator and the Proposer took the Workgroup through the updated legal drafting:

- **Part CI 3** – the additional paragraph references were noted, advising that this brings the UNC and IGT UNC more in line;
- **Part CI 8** – it was noted that line four had been deemed to no longer be needed. The Proposer advised that the Modification needed to allow for this paragraph to apply under IGT UNC and so we needed to remove the “switching off” text.

A Workgroup member asked whether there was still a need for “with the following changes” given that the denoted paragraphs have been removed. The Proposer and Code Administrator agreed that this may not be needed, and the Code Administrator took an action to check the current Code paragraph to see if there were any other denotations. If there were not, the Code Administrator would remove this wording. If there were they would leave it as it would still be¹. The Workgroup were happy with this approach.

- **Part CI 23** – it was noted that paragraph G6 of UNC TPD was excluded when the IGT UNC went through the changes for the REC. This area in the UNC is all about SPA transactions for non-CSS sites and was not needed so did not need replicating. Now that we have National Gas as a large transporter we need this to apply so all transitions that take place related to these non-CSS networks are appropriately covered.
- **Part J2** – it was noted that NTS in TPD Section J had a potential clash due to how point of offtake was set out within the IGT UNC. To avoid confusion with regards to point of offtake,

¹ The Code Administrator reviewed the current Code provisions and there are further denotations. The Code Administrator has therefore not updated the drafting as the “with the following changes” text is still necessary.

and to ensure there was no clash in respect of an NTS Supply Meter Point, some additional text has been added in pointing to the new Part R 3.7.

- **Part J3** – it was noted that the additional text in J3.3(h) relates to R3.10 and ensures that a breach of this paragraph is included in the list of circumstances in J3.3. This means that the relevant IGT is not required to make gas available for offtake should such a breach occurs.
- **Part R1.6** - it was noted that changes to 1.6 were more of a tidy up exercise. The Proposer spotted that there was an error resulting in a potential duplication if we retained this. There are provisions that are nearly identical within other areas of Code, and this is no longer needed.
- **Part R2** – it was noted that a set of square brackets had been removed following a discussion with NGT.
- **Part R3.10** – the Proposer referenced discussions from the June 2025 meeting around interactions between the UNC and IGT UNC. They noted that they have followed the format of TPD Section J in their drafting and have tried to keep the numbering the same between the Codes.

In Section J, regarding NExA for NTS offtake, there is an obligation related to NTS capacity. Which has never been required in the IGT UNC before. The Gas going in from the NTS to the IGT network will have obligations relevant to the flow of gas and how it relates to capacity. There are obligations in the UNC that stipulate that, where there is a breach with regards to capacity, NGT can stop the flow of gas. If this happened with an IGT network directly connected to the NTS, stopping the flow of gas would impact the IGT's ability to pass gas onto the consumer downstream of the NTS-IGT connection point. As a result, wording from the UNC has been pulled and added into the IGT UNC to ensure that the party that is acquiring gas at the CSEP will comply with the provisions of TPD Section J3.10.2(b) of the UNC. This, combined with the changes to Part J3.3(h) means that where there is a breach of this obligation, the IGT does not have to continue the flow of gas.

- **Part R3.10.5** – the Proposer advised that the previous drafting was overly complex and therefore they have simplified the drafting, but the intent is the same.
- **Part R4.5** – the Proposer advised that this was a suggested change from NGT.
- **Part R5.2** – the Proposer advised that this was a suggested change from NGT. They added further that the reference to 4.3.6 was removed as the mechanism is quite complex and as we do not have interconnectors, this was not seen as needing to apply. Instead, a reference to the PExA was added.

The Code Administrator asked the Workgroup to consider whether the legal drafting delivers the intent of the solution, subject to the potential change to CI8 (which the Code Administrator later deemed to not be necessary).

A member confirmed that they were happy with the changes. Other members agreed with this view and had no further comments to add.

The NESO representative noted that whilst the legal drafting will have no impact on them, they agree that the drafting delivers the intent of the solution.

The Workgroup unanimously agreed that the legal drafting delivers the intent of the solution and that no further work is required.

Panel initial views (July 2025)

The Code Administrator took the Panel through the views of the Workgroup, noting the significant amount of work done by the Workgroup and the Proposer on the legal drafting.

A Panel member advised that they were happy with the work completed by the Workgroup on the drafting, noting that they had gone through it thoroughly. Other Panel members agreed with this view.

The Panel unanimously agreed that there was no further work required on the drafting at this time.

Panel decision (August 2025)

The Panel, having considered all consultation responses, unanimously agreed that the legal text delivers the intent of the solution and that no further work was required.

10 Consultation

Panel invited representations from interested parties by 18th August 2025. The summaries in the following table are provided for reference on a reasonable endeavours basis only. We recommend that all representations are read in full when considering this Report. Representations are published alongside this Final Modification Report.

Representations were received from the following parties:			
Organisation	Response	Relevant Objectives	Key Points
CNG Services Ltd.	Support	D – Positive F – Positive	- Support implementation of the Modification. Noting that they support competitive options being available for entry to the GB gas network. In combination with UNC0887, this Modification facilitates entry to the NTS 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 development. - Believes that UNC0887 and IGT176 meet the Self-Governance criteria but recognise that it is appropriate for IGT176 to be Authority Determined on the basis that UNC0887 is also. - No new issues or impacts raised. - Facilitating competition between Gas Transporters impacts the relevant objectives 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. 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. • They would not face any development nor ongoing costs as a result of this Modification being implemented. • Regarding implementation, they note that a number of potential projects have been identified that cannot go ahead until IGT176 and UNC0887 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. • Agree that the legal text delivers the intent of the Modification. • Additionally, they noted that Biomethane projects need innovation and competition to reduce costs. By supporting a new route to market, this modification is helpful.
Grosvenor Green Gas LTD & Grosvenor Farms LTD	Support	D – Positive	• Support implementation of the Modification. This is because injection of green gas into the NTS will offer significant advantages to green gas producers. Having a formalised framework by which IGTs can transport green gas into the NTS is economic and efficient and underpins support for the Modification. • Believes that IGT176 meet the criteria for Self-Governance. • Supports the implementation of the basis of a positive impact on Relevant Objective D. Believes that additional green gas input into the NTS will increase supply and therefore increase demand. They believe that this is reinforced by a formalised framework for IGT delivery of green gas into the NTS. • Additionally, supportive of Relevant Objective D on the basis of additional green gas input into the

			NTS having a positive effect on net zero goals. - No new issues or impacts raised. - Agree that the legal text delivers the intent of the Modification. - Support the implementation approach and note that an approval in the Summer of 2025 would support their projects by limiting delays. - Regarding costs, reported that they would employ an IGT to develop connections to the NTS. They expect to bare the costs of any such a development but have not provided an estimated quantification of these costs. - Additionally, they noted that Biomethane projects need innovation and competition to reduce costs. By supporting a new route to market, this modification is helpful.
BUUK	Support	A – Positive B – Positive D – Positive	- Support implementation of the Modification. Supports on the basis that Workgroup discussions on IGT176 have been robust, and that IGT176 has now been progressed to a level equal to UNC0887. - Believes that the Modification should be subject to Authority Decision, on the basis that UNC0887 is also subject to an Authority Decision. - No new issues or impacts raised. - Agrees with the workgroup position that this Modification would have a positive impact on Relevant Objectives A, B & D. - Agrees with the workgroup rationale for the positive impact on Relevant Objectives A, B & D. - Has not identified any costs associated with the implementation of IGT176. - Regarding the implementation approach, believes that IGT176 should only be implemented if UNC0887 is implemented, to ensure IGT176's intention as a mirror Modification to the UNC is met. - Satisfied that the legal text has delivered the intent of the Modification.
Ceres Energy	Support	A – Positive D – Positive	Support implementation of the Modification. Supports on the basis of access to the NTS via an iGT resulting in improved project viability and

		F – Positive	new competitive opportunities for access to the gas network. - Believes that UNC0887 and IGT176 meet the Self-Governance criteria but recognise that it is appropriate for IGT176 to be Authority Determined on the basis that UNC0887 is also. - No new issues or impacts raised. - Supports the Modification on the basis of a positive impact on Relevant Objectives A, D & F. - Support for Relevant Objective A is based on the Modification facilitating additional long-term sources of green gas in the form of biomethane delivered to the NTS via the proposed solution. - Support for Relevant Objective D is based on the Modification facilitating competition amongst Gas Transporters as they compete for contracts offered by Biomethane producers who will be able to access the NTS via their services. - Support for Relevant Objective F based on the Modification ensuring that there is a consistency of obligations upon IGTs in relation to their proposed role in injecting gas into the NTS. - Has not identified any costs associated with the implementation of IGT176. - Supports as small a lead time as possible for the delivery of the IGT176 proposed solution. Due to time constraints imposed by the Green Gas Support Scheme deadline of 31 March 2028, the respondent is keen to utilise the proposed solution as soon as possible. They have confirmed that a prompt implementation would help reduce uncertainty for project funding. - Satisfied that the legal text has delivered the intent of the Modification.
Advanced Fuel Plants Ltd	Support	D – Positive	- Supports implementation of the Modification. They have identified that the most cost effective approach for green gas producers to connect to the NTS is via IGTs and support the Modification on this basis. - Green gas producers are incentivised to offtake and import gas from the NTS, and the respondent supports this Modification on the basis that this will reduce the design, material and labour costs

			associated with doing so via a bi-directional connection. - Believes that IGT176 meet the criteria for Self-Governance, on the basis that they do not believe that the scale of the issue underlying IGT176 is significant enough to warrant a decision by the Authority. - No new issues or impacts raised. - The implementations of the Modification would support Relevant Objective D. The respondent indicates that by allowing additional green gas to be injected into the NTS, the resulting increased supply will promote an increase in competition, as well as promoting Net Zero objectives. - They have also identified that a formalised framework for injection of green gas into the NTS via IGTs as per the IGT176 solution would also support Relevant Objective D. - Has not identified any costs associated with the implementation of IGT176. Furthermore, they have identified that as the proposed solution would allow them to use less land area to engage with the NTS by virtue of a single, bi-directional connection rather than two one directional connections, they would reduce costs as a result. - Has confirmed that, if IGT176 were implemented, they would utilise iGT contracts to develop NTS connections, and that this in turn would result in a reduced environmental impact. - Supports as small a lead time as possible for the delivery of the IGT176 proposed solution. Due to time constraints imposed by the Green Gas Support Scheme deadline of 31 March 2028, the respondent is keen to utilise the proposed solution as soon as possible. They have confirmed that a prompt implementation would help reduce uncertainty for project funding. - Satisfied that the legal text has delivered the intent of the Modification.
National Gas Transmission Ltd	Support	A – Positive B – Positive D – Positive	Supports implementation of the Modification. Support on the basis of enabling alignment with the UNC by mirroring UNC0887, and by providing a framework for bi-directional transfer between Supply Points and the NTS.

			- Believes that the Modification should be subject to Authority Decision. - No new issues or impacts raised. - Supports the Modification on the basis of a positive impact on Relevant Objectives A, B & D. Their rationale for support aligns with the rationale provided by the Workgroup. - Have not identified any costs associated with the implementation of IGT176 beyond those already attributed to the implemented of UNC0887. - Have not identified any lead time required prior to implementation. - Satisfied that the legal text has delivered the intent of the Modification.
SGN	Support	A – Positive B – Positive D – Positive	- Supports implementation of the Modification. Support on the basis of enabling alignment with the UNC by mirroring UNC0887, and by providing a framework for bi-directional transfer between Supply Points and the NTS. - Believes that the Modification should be subject to Authority Decision. - No new issues or impacts raised. - Supports the Modification on the basis of a positive impact on Relevant Objectives A, B & D, on the basis of increased competition between Suppliers & Shippers, and the introduction of more low carbon gas into the NTS. - Have not identified any ongoing costs associated with the implementation of IGT176. - Regarding implementation lead time, have identified that IGT176 will need to be implemented alongside UNC0887, and that the implementation date and lead time need to be inclusive of any central system changes required by the proposed solution. - Satisfied that the legal text has delivered the intent of the Modification.

Summary of responses

There were 7 responses to the IGT176 consultation; 2 from IGTs, 2 from DNOs, 2 from Biomethane producers, and one from a Shipper.

It is recommended that all consultation responses are looked at individually. All response to the IGT177 consultation can be found [here](#).

Governance

Of the 7 responses, 5 believe that the Modification should be subject to Authority Decision, and 2 believed that the Modification meets the criteria for a Self-Governance decision. Of the 5 who believed that the Modification should be subject to Authority Decision, 1 respondent (a Shipper) felt that the Modification ought to be subject to a Self-Governance decision but recognised ultimately that an Authority Decision would be appropriate on the basis that UNC0887 is subject to an Authority Decision also.

The 2 respondents who felt that the Modification should be subject to a Self-Governance decision were Biomethane Producers. One did not provide a rationale, and the other said that they felt that the scale of the underlying issue was not significant enough to warrant engagement from Ofgem.

Implementation

All respondents supported the implementation of the Modification.

Relevant Objectives

Of the 7 respondents, all identified Relevant Objective D as being positive impacted by the implementation of this Modification. Additionally, 4 of the respondents also identified a positive impact on Relevant Objective A, 3 identified a positive impact on Relevant Objective B, and 2 identified a positive impact on Relevant Objective F. No negative impacts on any relevant Objectives were identified by any of the respondents.

Legal text

All respondents agreed that the Legal Text delivered the intent of the Modification.

Implementation approach

All respondents agreed with the implementation approach and support an aligned approach with UNC0887. The Biomethane producers identified a need for a rapid implementation in order to ensure that the proposed solution is in place in time for them to take advantage of industry schemes such as the Green Gas Support Scheme.

Impacts and costs

Costs: 6 out of 7 of the respondents did not identify any costs associated with the implementation of the Modification. The one respondent (a Biomethane producer) who did identify a cost was not able to provide a quantification but indicated that the costs were likely to result from the employment of an IGT to convey Biomethane to the NTS on their behalf.

Benefits: All of the respondents indicated that they supported the Modification and drew attention to various benefits in respect of support of the Relevant Objectives. One of the respondents (a Biomethane producer) identified a unique benefit in that they anticipated that the physical area needed for a single bi-directional access to the NTS would be smaller than that needed for two one-directional accesses, and as such would expect to use less land area, reducing their costs.

Additional comments

No additional comments were recorded by the respondents.

Panel determinations (August 2025)

The Panel considered all consultation responses and agreed unanimously that no further work was required by the Workgroup and no new issues had been raised.

11 Panel Discussions and Recommendations

Panel Discussions

For relevant Panel discussions, please see the other sections of this Document.

Panel Determinations

The Panel considered the IGT176 FMR, and **unanimously** agreed:

- that IGT176 does not have an impact on any SCRs or significant industry change projects;
- that IGT176 is an Authority Direction Modification Proposal;
- that impacts and costs set out in the report are accurate and appropriate and there is nothing more to add;
- that IGT176 will have a positive impact on Objectives (A), (B), and (D);
- with the proposed implementation approach;
- that the IGT176 solution delivers the intent of the Modification; and
- that the legal drafting delivers the intention of the solution.

The Panel **unanimously** agreed to recommend to the Authority:

- that IGT176 should be implemented.