

Consultation Response

CSL01: Exclusion of Standalone Networks from IGT UNC

Responses invited by: 19 May 2026

Respondent Details

Name: Aleksis Butler

Organisation: BUUK

Support Implementation ☒

Qualified Support ☐

Neutral ☐

Do Not Support ☐

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

BUUK supports CSL01, as the intent of the Modification is to amend CNG Services Ltd Individual Network Code to disapply the IGT UNC in light of their Standalone Networks.

Disapplying the IGT UNC avoids complexity and obligations for networks that do not interact with existing IGT arrangements, and the GB Gas Grid as a whole. The proposed approach ensures the IGT UNC continues to apply only where it is relevant and effective.

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 agree with the proposer's decision that the Modification should proceed as Authority Direction. We also note that Ofgem provided a view at the IGT UNC Workstream that took place on Thursday 12th March 2026 that they were happy with the governance route chosen.

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

No new or additional issues to be considered.

Relevant Objectives

How would implementation of this modification impact the relevant objectives?

We agree with the workgroup rationale that the disapplication of the IGT UNC means that the impact of CSL01 Standalone Networks minimises impacts on existing Code parties and Code arrangements, thus proving positive in relation to Objective D, and F.

Impacts and Costs

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

No costs or expected impact if this Change to CNG Services Ltd Individual Network Code is amended.

Implementation

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

We would need no lead time for this Modification as it does not alter the IGT UNC, nor impact BUUKs three Individual Network Codes.

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

As stipulated at IGT UNC Panel, there would be a benefit in defining what a 'Standalone Network' is within the IGT UNC, avoiding any unintended differences in the understanding of 'Standalone Networks'.

Albeit, we are happy, that in the absence of a definition in code, the addition of Clause 3 to Schedule 1 of the CSL Network Code, clarifies what a Standalone Network is, in relation to how CNG Services Ltd intend to operate their networks with no connection to the GB gas grid.

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

N/A.

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