

Consultation Response

CSL01: Exclusion of Standalone Networks from IGT UNC

Responses invited by: 19 May 2026

Respondent Details
Name: Helen Gilbert
Organisation: NESO

Support Implementation	☐
Qualified Support	☐
Neutral	X
Do Not Support	☐

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

This Modification aims to enable the development of Standalone Gas Networks (networks with no connection to the GB gas grid) by disapplying IGT UNC provisions that are not fit for purpose from CNGs own Individual Network Code. All pipeline transportation, charging and switching will be managed by the network owner.

By disapplying IGT UNC provisions that were designed for connected, system-wide networks, the Modification removes unnecessary regulatory barriers and allows bespoke arrangements that better reflect the physical and commercial realities of Standalone Networks.

However, as these network arrangements will not be contained in a Network Code, we are unable to assess the impacts to consumer protections, charging, safety, settlement or switching arrangements. We therefore do not consider this solution to be scalable beyond the initial project CNG have presented.

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?

NESO agrees with the Panel's determination that this Modification should proceed under Authority Direction. Given that the proposal disapplies the IGT UNC for a defined class of networks and is the first of its kind, Authority oversight is appropriate.

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?

NESO is of the opinion that the Modification is neutral supporting (D) Securing of effective competition and (F) Promotion of efficiency in the implementation and administration of the Code.

For (D), CSL01 supports effective competition by enabling bespoke arrangements for Standalone Networks that reflect their unique physical and commercial characteristics, without imposing system-wide rules designed for connected networks. By confining costs, risks and operational arrangements to the parties directly involved, the Modification avoids distortions that could otherwise impact competition in the wider GB gas market. However, in the respect of Shipper arrangements it would put them at a disadvantage as there would be a need to have bespoke arrangements and workarounds to enable them to manage these sites which would otherwise be handled by central systems.

In the case of (F), the Modification promotes efficient Code administration by disapplying complex IGT UNC provisions that are not fit for purpose for Standalone Networks. However, by completely disapplying the Code it leaves gaps in the processing of these sites that would otherwise be supported by regulatory arrangements or appropriate frameworks. Additionally, with no low-level detail provided on exactly how those processes will be replicated presents a risk to any party involved in those processes.

Impacts and Costs

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

NESO is not an impacted party to this Modification. We have no comments relating to impacts and costs.

Implementation

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

NESO is not an impacted party to this Modification. We have no comments relating to implementation timeline.

Legal Text

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

NESO are satisfied that the legal text will deliver the intent of the Solution.

Further Comments

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

None

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