

Representation - Draft Modification Report UNC 0842

Gas Entry onto the Total system via an Independent Gas Transporter

Responses invited by: **5pm on 26 January 2024**

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	John Baldwin, Managing Director
Organisation:	CNG Services Ltd
Date of Representation:	Friday 26 th January 2024
Support or oppose implementation?	Support
Relevant Objective:	a) Positive b) Positive
Relevant Charging Methodology Objective:	Not Applicable

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

There are opportunities for the proposed IGT approach to provide an additional option for biomethane developers in particular where the route to the main gas grid is difficult with restrictions on easements. The IGT approach also offers flexibility on asset adoption and processes which may reduce costs and schedule for a new biomethane project

Implementation: *What lead-time do you wish to see prior to implementation and why?*

Projects are awaiting a decision currently so for implementation as soon as possible

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

It may reduce our costs on some projects for example of the adoption of the connection pipeline is difficult due to easement issues

Legal Text: *Ar you satisfied that the legal text will deliver the intent of the Solution?*

Yes

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

Biomethane projects need innovation and competition to reduce costs and this modification is helpful