

## Representation - Draft Modification Report UNC 0808

### Reverse Compression

Responses invited by: **5pm on 10 August 2023**

To: [enquiries@gasgovernance.co.uk](mailto:enquiries@gasgovernance.co.uk)

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

<b>Representative:</b>	Julia Safiullina
<b>Organisation:</b>	Iona Capital Ltd
<b>Date of Representation:</b>	31 July 2023
<b>Support or oppose implementation?</b>	Support
<b>Relevant Objective:</b>	
<b>Relevant Charging Methodology Objective:</b>	

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

Our portfolio consists of 17 biogas facilities across the UK. We continuously look to improve the economics of the plants, which could be achieved by expansion. However, these expansion projects are put on hold due to gas to grid constraints. We also have rejected a number of potentially economically viable biogas projects due to the summer constraints from the gas grid. If reverse compression is available as an option, not only we will be able to expand existing facilities to produce more gas but would also be able to resurrect some of the rejected biogas projects.

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

To take advantage of the opportunities at present, we would like to have a short lead time for the implementation of the changes proposed. The competition for feedstocks is always present and whilst the opportunities are economically viable today, they might not be there in 18-24 months due to the feedstock availability.

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

Analysis of feedstock requirements and sources, consents (planning permission and environmental permit) amendments and some amendments to existing contracts (e.g. lease) on top of actional construction costs and operational costs.

**Legal Text:** *Are 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**