

Representation - Draft Modification Report UNC 0808

Reverse Compression

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

To: enquiries@gasgovernance.co.uk

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

Representative:	Daniel Lambert, Downstream & Innovation Director
Organisation:	Acorn Bioenergy Limited
Date of Representation:	4 August, 2023
Support or oppose implementation?	Support
Relevant Objective:	b) Positive d) Positive
Relevant Charging Methodology Objective:	c) None

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

Acorn is a developer of anaerobic digestion facilities to produce biomethane for grid injection, focused on developing plants in rural areas using agricultural feedstocks. There are many sites where we have considered developing facilities which would be suitable in all respects (e.g., support from local feedstock producers as the anaerobic digestion plant would provide an ideal repository for agricultural wastes, residues, and rotational break crops; suitability for siting away from human settlements, etc.) except that local gas grid connections often do not provide the capacity to ensure year-round consistent export of biomethane to the gas grid. We support this modification because reverse compression (moving gas from lower to higher pressure tiers) will help mitigate gas grid export constraints such as those described above. This will help enable projects that would be suitable in all other respects other than robustness of gas grid connection, to connect to the gas network and ensure sufficient export capacity to make such projects investable (whereas with the current constraints they would often not be investable).

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

No lead time is necessary and implementation can be immediate when a decision is made. We are aware of a reverse compression project with a target of implementation in early 2024, and implementation well ahead of this is desirable.

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

None.

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

N/A