

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:	Nic Crowe
Organisation:	Grissan Renewable Energy
Date of Representation:	9 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)

We support this modification because it will enable greater capacity for green gas to be injected to the low-pressure gas network and increase the overall potential for green gas usage in the UK. Reverse compression (moving gas from lower to higher pressure tiers) can increase the availability of network capacity for parties looking to inject gas. This modification facilitates independent Gas Transporters owning the pipeline on which reverse compression assets are installed. By facilitating competition, the modification is expected to help deliver cost effective reverse compression solutions.

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. Reverse compression assets and better grid access should reduce the overall cost of biomethane generation in the UK.

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.*

N/A

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

Grissan Renewable Energy operates multiple biomethane sites with grid injection across Scotland.

Sites are often best located in rural areas where they ensure minimal disruption to other local amenities, however, this can mean that gas grid access can be a limiting factor in production.

For example, in 2022 despite the Government's desire to increase energy security and domestic gas production in the wake of Russia's illegal invasion of Ukraine, Grissan was unable to inject due to local pressure restrictions. As gas demand begins to reduce across the economy with the drive to Net Zero it is likely that grid restrictions will increasingly become a limiting factor.

Modification 0808 provides the regulatory basis to prevent such future bottlenecks and facilitate investment in necessary infrastructure to prevent the supply and demand issues of the network of tomorrow. On that basis, we are happy to lend our support to the proposal.