

2024 REVIEW OF THE STATEMENT OF GAS TRANSMISSION CONNECTION CHARGING

INFORMAL CONSULTATION RESPONSE PROFORMA

Please provide your answer to the following questions, by placing a X in the appropriate box next to each question and provide any comments in the area provided for each question.

| Questions | | Yes | No |
|--|--|-----|----|
| 01 | Do you support the proposed changes to the Statement for Gas Transmission Connection Charging as outlined in the Informal Consultation? | | |
| <p>Comment: We have no specific views on the proposed changes.</p> | | | |
| 02 | Are there areas not within the scope of this 2024 Informal Consultation that you would like to see considered for a future Informal Consultation? If 'yes', please provide your suggestions below. | Yes | |
| <p>Comment:</p> <p>There is significant potential for more green gas to be injected directly to the NTS, which is a great resource that should be used to help the UK reach net zero. We envisage twenty new connections in the remaining four years of the Green Gas Support Scheme and around 3 TWh/annum of biomethane with projects significantly larger than those injecting into the distribution system as a result of high NTS capacity and no need to enrich with propane. Plus Bio-CNG projects and 50 MW gas engine plants</p> <p>Project CLoCC included the first biomethane site to inject to the NTS, providing a model for others to follow. During 2023 NGT held a series of meetings with biomethane producers and agreed to make technical changes to the designs to help such projects. In effect this was a CLoCC phase 2. Following this successful technical review, we believe a much simplified process is appropriate for small diameter connections, with charges to match. We would propose that all connections with the pipe size 80mm or less, should have a revised cost and timeframe or these could be included in the existing lowest cost "Standard Design (Fixed Fee)" category, with the FCO issued within 3 months,(preferably with a target of two months). This would apply for all hot tap or above ground connections to existing assets at this scale, be they entry or exit, or indeed bi-directional.</p> <p>We would also like NTS to provide more confidence to the industry that, in effect, there is always capacity to inject biomethane and this does not need a study.</p> <p>We have contacted biomethane developers who are actively engaged in NTS projects and they may want to add their comments. Hopefully if there is a general consensus from the biomethane industry this will help NGT to implement changes in a timely fashion so we move away from the £45K/6 months standard that we believe is no longer appropriate based on the new connection model developed last year in the Biomethane Forum meetings NGT held.</p> | | | |

| CONFIDENTIALITY | Yes | No |
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| Do you wish your response to remain confidential? | | No |
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| Contact Name | John Baldwin |
| Company Name | CNG Services Ltd |

SUBMITTING RESPONSES

Please complete and submit any responses using the response proforma by no later than 17:00 hrs on 01 March 2024, to Richard Hounslea, Gas Connections Manager by email to richard.hounslea@nationalgas.com. We welcome any responses ahead of this date.

If you would like to discuss this consultation, please contact Richard Hounslea directly using the email address above or by dialling 07973 839 048.

Information arising from the consultation may be shared with Ofgem and aggregated feedback may be shared at the Transmission Workgroup as appropriate.