

Consultation name: Proposed modifications to Special Conditions 1.1 and 3.18 of the gas transporter licences: statutory consultation

Issued by: Ofgem

Territorial extent: Great Britain

Response author: SGN

Deadline for responding: 7th March 2025



SGN

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By email to: catherine.warrilow@ofgem.gov.uk

7th March 2025

Dear Catherine,

Proposed modifications to Special Conditions 1.1 and 3.18 of the gas transporter licences

Thank you for the opportunity to respond to the above statutory consultation¹.

Following the Final determination of the RIIO-2 Tier 1 Stubs Repex Policy Re-opener, SGN are in agreement with the proposed changes to special conditions 1.1 and 3.18 of the gas transporter licence which suggests the introduction of a price control deliverable (PCD) funding mechanism to deliver the Tier 1 Stubs programme.

SGN finds that the approved cost allowances for the workload described will enable continued delivery under this mechanism and would suggest that with this deliverability across the remainder of GD2, a price control deliverable may be a suitable approach to a Tier 1 stubs workload for GD3.

Should you have any questions or wish to discuss further, please do not hesitate to contact me on alexandria.graham@sgn.co.uk

Yours sincerely,

Alexandria Warren
Regulatory Reporting Manager
SGN

¹ [Proposed modifications to Special Conditions 1.1 and 3.18 of the gas transporter licences: statutory consultation](#)