

Consultation

Natural Gas asset repurposing valuation methodology

Publication date:	20 May 2025
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Response deadline:	1 July 2025
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We are consulting on the methodology that we will use to determine the Regulatory Asset Value (RAV) transfer when assets are repurposed from the natural gas network for use in future hydrogen and CO₂ transport & storage networks. We would like views from people with an interest in natural gas transmission and distribution, hydrogen transport networks, and CO₂ transport & storage networks. We would also welcome responses from other relevant stakeholders.

This document outlines the scope, purpose and questions of the consultation and how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

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Executive Summary

In our July 2024 [RIIO-3 Sector Specific Methodology Decision Overview Document](#) we stated that we were considering potential valuation options for the transfer of any repurposed assets between the existing natural gas asset base model (RIIO) and the future Hydrogen Transport Business model (HTBM) (4.12). We also stated that we would work with DESNZ to ensure that the work on the HTBM regarding asset repurposing would be reflected in RIIO.

After careful consideration of potential valuation options, we are now consulting on the appropriateness of our minded-to methodology for valuing natural gas assets that are proposed to be repurposed for use in networks covered by the Hydrogen Transport Business Model, CO₂ Transport & Storage Business Model and regulated gas networks without support from these business models. The formula described by the methodology will determine the value which is transferred out of the RIIO Regulatory Asset Base and into its respective new regulatory asset Base.

Our minded-to methodology is to use **Depreciated Replacement Cost (DRC)**. The methodology has the following formula:

$$= \text{Reproduction Cost New} - \text{Accumulated Depreciation}$$

We believe the **DRC** is an approach that provides a fair and value for money outcome for natural gas consumers (both future and current) and future network consumers. We also believe that the methodology is not overly complex and is robust to future changes in costs over time.

In addition, as part of this consultation we are issuing a request for information regarding the scope and cost of expenditure required for repurposing natural gas assets for reuse in a future hydrogen network as well as views on how these should be funded.

1. Introduction

Section summary

This section provides background into why an asset repurposing valuation methodology is required, the questions we are consulting on, and our proposed next steps.

Background

- 1.1 As the UK Government aims to achieve Net Zero by 2050, the existing natural gas network will face a diminishing user base, reducing the need for natural gas

pipelines. As a result, it is likely that gas pipelines will need to be safely decommissioned or repurposed. Similar types of assets that are currently used in natural gas networks could be used in future hydrogen networks and other gas networks. These assets could include, as an example, pipelines or compressors/expanders as well as metering and monitoring equipment.

- 1.2 Ofgem has an existing role as the economic regulator of the gas transmission and distribution natural monopolies. Through the RIIO Price Control Financial Model (PCFM), we (Ofgem) determine the allowed revenue that gas transport licensees can recover from consumers. Gas transporter licensees have a regulatory asset value associated with the value of the assets that they own and for which they receive an allowed return payment upon. This regulatory asset value grows when new investment is spent on the network and reduces annually via regulatorily defined depreciation schedule.
- 1.3 Whilst the physical assets selected for repurposing can be clearly and precisely identified, their assigned value (the book value) is embedded within the overall network's regulatory asset value (RAV) and thus cannot be easily separated. An asset repurposing valuation methodology is therefore necessary to derive an appropriate new regulatory asset value from the specific repurposed gas assets.
- 1.4 It is important that the asset value transferred is conducted on a 1:1 basis from the RIIO RAV to the Hydrogen Network RAV. This is to ensure that no RAV is created to the detriment of natural gas and hydrogen consumers, or destroyed, to the detriment of investors.
- 1.5 When the asset/s that are repurposed leave the natural gas network to become part of a hydrogen network, their regulatory value, calculated using our minded-to methodology, will exit the natural gas RAV and will enter the hydrogen RAV. Consequently, the value of what was the asset will be removed from the original Licensee's natural gas RAV and therefore will no longer contribute to the gas network's allowed revenue.
- 1.6 Meanwhile, the regulatory value associated with the repurposed asset determined by the asset repurposing methodology will be added to the hydrogen transport network licensee's hydrogen RAV and therefore will contribute to the calculation of the hydrogen transport network's allowed revenue.
- 1.7 Given Ofgem's principal objective to protect the interest of existing and future consumers in relation to gas conveyed through pipes, we want to ensure that the methodology used to derive the value of the repurposed asset is value for money for both hydrogen and natural gas consumers. For instance, an

overvaluation of repurposed gas assets will lead to hydrogen consumers unfairly paying higher network costs, whereas an undervaluation of gas assets will lead to natural gas consumers indirectly subsidising hydrogen consumers.

- 1.8 We acknowledge that there is a decommissioning liability associated with gas assets. At this time, it is unknown how decommissioning costs will be treated in RIIO RAV and in the hydrogen network RAV. As a result, the methodology does not consider decommissioning liability in the asset valuation as there is risk of double counting this liability in future. However, this minded-to position does not preclude the determination of a proportion of the decommissioning liability remaining with the original owner to ensure that users of network receiving the asset are not incurring all the decommissioning liability for an asset that gas consumers have also benefited from.
- 1.9 For the avoidance of doubt, this consultation is only focused on determining the value of an asset that is to be repurposed from the natural gas network to hydrogen or CO₂ transport & storage networks. It does not seek to address other relevant/wider considerations in respect to the transfer of the asset, that sit outside of the asset transfer methodology, including consideration of the circumstances in which it may be determined that transfer is not appropriate. Whilst work is ongoing, Ofgem's current view is that such relevant considerations could include whether transferring the asset could result in: a.) unreasonably compromising natural gas security of supply, b.) losses relative to the status quo for natural gas consumers, c.) losses to hydrogen consumers relative to if the network built an equivalent new build asset, or d.) the Secretary of State deems that the repurposed asset is more appropriate for use in a different network than that originally proposed.

CO₂ transport and storage networks

- 1.10 CO₂ transport and storage networks may use similar assets to those used in the natural gas network. We expect that the asset valuation methodology adopted for the transfer of assets from the natural gas RAV to the hydrogen RAV will apply to the transfer of assets to the CO₂ transport and storage RAV.
- 1.11 In addition, [Standard Condition C2: Onshore Decommissioning Fund of the CO₂ Transport & Storage Licence](#) requires Licensees to establish a fund to cover the costs of decommissioning the onshore components of the Transport & Storage network. This is a unique aspect of the economic regulatory regime of CO₂

Transport & Storage networks, which does not apply to Ofgem's other regulated networks (including natural gas).

What are we consulting on

- 1.12 Firstly, in section 2, we are consulting on the appropriateness of our minded-to asset repurposing valuation methodology. We propose using Depreciated Replacement Cost. This methodology is calculated by obtaining the Modern Equivalent Asset Value (MEAV) and deducting depreciation. In this section, we also ask which costs incurred before and after the asset transfer that are necessary for ensuring hydrogen can be transported in repurposed assets should sit within which network's RAV.
- 1.13 Secondly, in section 3, we are asking for information regarding the scope and cost of expenditure required for repurposing natural gas assets for reuse in a future hydrogen network.

Next steps

- 1.14 Subject to responses to this consultation, we will decide on whether to confirm our minded-to asset repurposing valuation methodology.
- 1.15 Subject to the response to this consultation, we will decide on the inclusion of a bespoke adjustment mechanism to account for any repurposing costs incurred by the Natural Gas network before the asset transfer to make these assets suitable for transfer to a hydrogen network.
- 1.16 Subject to the response to this consultation, we will decide on the inclusion of a bespoke adjustment mechanism to account for any repurposing costs incurred by the hydrogen network after the asset has been transferred to make the assets useable in a hydrogen network.
- 1.17 If we do decide upon the DRC asset repurposing valuation methodology, our intention would be to integrate this methodology into the natural gas transporter licences standard/special conditions. Our expectation would be to include this methodology within the upcoming draft and statutory gas transporter licence modification consultations associated with the start of the RIIO3 regime.
- 1.18 We will use the information received from Q6-Q10 to help develop further policy positions.

2. Asset repurposing minded-to position

In this section we describe our asset repurposing valuation methodology minded-to position, Depreciated Replacement Cost, and provide our rationale for preferring this option. Our current view is that the DRC methodology provides a value for money, investable, fair and future proof valuation methodology for repurposed assets that does not introduce undue complexity. We also describe alternative methodologies considered and our rationales for why these methodologies are not our preferred option. Finally, there is a section seeking general views on the treatment of decommissioning liability associated with repurposed assets.

- 2.1 We shortlisted five potential repurposed asset valuation methodologies:
 - Discounted Cash Flow
 - Depreciated Replacement Cost
 - Net Book Value Adjusted
 - Top-down assessment
 - Multi-factor top-down assessment
- 2.2 We then evaluated these methodologies against the four following criteria created through synthesising [Ofgem's Consumer Interest Framework](#) and [DESNZ' HTBM Key Design Principles](#).
- 2.3 The methodology should be **investible and value for money**: it should deliver at the lowest feasible cost to Government, consumers and users and should enable predictable returns to investors over time.
- 2.4 The methodology should **promote fairness**. A fair asset valuation will ensure that natural gas and hydrogen network operators receive and pay a fair price for the asset respectively. The valuation methodology should also ensure that the networks can operate a high-quality and reliable service to ensure that consumers and network users are satisfied.
- 2.5 The methodology should **avoid unnecessary complexity**: it should be transparent, practical, and simple to implement to remove subjectivity where possible.
- 2.6 The methodology should be "**future proof**": it should maintain a resilient, safe, scalable, and replicable network which is not influenced by the timing of the gas to hydrogen transition. It should enable a sustainable network to grow that is compatible with all hydrogen business models as well as with the declining gas sector.

- 2.7 We ruled out market approaches which seek to determine the current value of an asset by reference to recent comparable transactions involving the sale of similar assets given the lack of comparable recent market transactions involving existing natural gas assets.

Minded-to methodology: Depreciated Replacement Cost

- 2.8 The minded-to methodology uses the following formula:

$$= \text{Reproduction Cost New} - \text{Accumulated Depreciation}$$

- 2.9 This method relies on the modern equivalent asset value. It takes the cost required to replace the existing asset with the modern equivalent for use in the natural gas network (including current prices, materials, techniques, design and technology). To arrive at an adjusted value of the repurposed asset, the method takes the modern equivalent asset and subtracts the value of accumulated historical depreciation. Please refer to the section 8 of Royal Institute of Chartered Surveyors' (RICS) "[Depreciated replacement cost method of valuation for financial reporting](#)" for further guidance on calculating the modern equivalent asset value.
- 2.10 This methodology is based on the economic theory of substitution, that a buyer will not pay any more to acquire an asset (the repurposed section of the existing gas network) than the cost of replicating the utility of the asset through the construction of a new one.
- 2.11 We expect the parties involved in the asset transfer to commission a suitably independent party to calculate the MEAV.
- 2.12 The depreciation term is to be calculated in line with industry best practice for the calculation of Depreciated Replacement Cost (e.g. RICS Red Book or International Valuation Standards Council publications)
- 2.13 We will consider the inclusion of bespoke adjustment mechanisms to account for any repurposing costs which may be incurred, a) within the Natural Gas network before transfer of the assets to make these assets suitable for transfer, or b) by the hydrogen network after transfer of the asset to make the assets useable in a hydrogen network. Any adjustment would be subject to an oversight by Ofgem on a case-by-case basis.
- 2.14 If we do determine the necessity of a bespoke adjustment mechanism we will look to determine where it is most appropriate to place these costs. We welcome stakeholder input regarding where costs incurred before asset transfer, and where those incurred after asset transfer should sit. We also welcome

stakeholder feedback on the likelihood and the magnitude of each of the category of costs.

- 2.15 For the hydrogen transport business model, after the asset repurposing valuation methodology has been applied and the value has been added to hydrogen network's RAV, efficient expenditure required for repurposing assets for use in the hydrogen network will likely be included as permitted expenditure that will contribute to the RAV.

Minded-to methodology: Justification

- 2.16 Our current view is that the DRC method is the most suitable methodology for valuation of repurposed assets given it best meets our four criteria.
- 2.17 The DRC methodology is **investable and provides value for money** due to its reliance on MEAV. MEAV accounts for current market conditions, the asset's useful life, and maintenance requirements over time. This is a predictable methodology which ensures that investors can be confident in their returns.
- 2.18 The DRC methodology is **fair** due to it focusing of tangible assets making it less sensitive to subjective and uncertain input assumptions such as forecast cashflows.
- 2.19 The DRC is **not unnecessarily complex**. The method requires accurate data on reproduction costs and depreciation estimates over the lifetime of the asset. We acknowledge however that some of these itemized historical depreciation values may not exist due to the nature of the RAV which could require some estimation via the formula stated in paragraph 2.12. However, once the data has been obtained, this is a relatively simple methodology to implement.
- 2.20 DRC is **future proof** since it looks at current replacement costs estimated via MEAV. This means that the approach automatically updates itself over time to reflect cost efficiencies and dis-efficiencies related to the construction of gas pipelines that may occur.
- 2.21 In addition, we believe that a valuation methodology anchored on the DRC approach is the most appropriate method contained within the Royal Institute of Chartered Surveyors professional standards. [RICS Red Book Global Standards Glossary](#) (section 3.2) states the DRC method may be appropriate for: *A property that is rarely, if ever, sold in the market, except by way of a sale of the business or entity of which it is part, due to the uniqueness arising from its*

specialised nature and design, its configuration, size, location or otherwise. We believe that this definition suitably applies to monopoly gas assets.

2.22 Finally, a methodology anchored on the DRC approach aligns with the conclusion of His Majesty's Treasury (HMT) regarding their preferred valuation option for networked assets in their [Thematic Review of Non-investment Asset Valuation for financial reporting Purposes Consultation Paper](#) (Section 4.12). HMT described networked assets as displaying some or all of the following characteristics:

- They are part of a system or network
- They are specialised in nature and do not have alternative uses
- They are immovable
- They may be subject to constraints on disposal

Other methodologies considered:

Net Book Value

2.23 This methodology is based on historic recorded cost (the original asset cost in the owner's accounts) adjusted for inflation and ongoing required capex to obtain the fair market value for the asset. Depreciation of the asset's value must also be subtracted from the original asset value to reflect the asset's diminishing value over time.

2.24 The methodology uses the following formula:

$$= \text{Original Asset Cost} + \text{Historic CAPEX} - \text{Accumulated Depreciation}$$

2.25 Whilst we did consider this approach to be investible and value for money and fair, this methodology is not our preferred option due to its backwards looking nature that adds potential estimation complexity and makes the approach less future proof.

2.26 Firstly, this methodology relies on historic data for individual assets that are to be transferred which, given the aggregation of assets inside the natural gas RAV, may not exist. Whilst estimations can be made, this substantially reduces the accuracy of this method.

2.27 Secondly, by using the original asset cost this methodology cannot react to changes in the cost of building gas infrastructure that may occur over time. For older assets the original asset cost could be substantially different from equivalent assets built today or in the future.

Discounted Cash Flow

2.28 This method uses expected future cash flows of the asset, derived from its expected use in the hydrogen network, and discounts them to today's value using the WACC as the discount rate (r). Additionally, this method also accounts for the growth potential of the hydrogen network and associated technologies through the forecasted yearly cash flows.

2.29 The methodology uses the following formula:

$$= \frac{Cashflow_{y1}}{(1+r)^1} + \frac{Cashflow_{y2}}{(1+r)^2} + \frac{Cashflow_{yn}}{(1+r)^n}$$

2.30 We do not consider this approach appropriate given its reliance on highly uncertain long-term forecasts regarding the future earnings of the repurposed gas asset in the hydrogen network based primarily on highly subjective judgements about the expected growth of the hydrogen network. For instance, an overestimation of the long term cashflows would lead to a higher than justified asset transfer value, thereby representing a transfer from hydrogen consumers to natural gas consumers.

Top-down assessment methodology

2.31 This method starts by valuing the entire portfolio or group of assets from the natural gas RAV where the repurposed assets are to be taken from. From there, the value is allocated proportionally to the individual assets based on an output metric such as kilometres of pipeline currently owned and operated by the relevant natural gas network.

2.32 This methodology could use the following formula:

$$= \frac{GAS\ RAB}{Total\ Km\ of\ pipeline\ gas\ RAB} * \%km\ of\ pipeline\ being\ transferred$$

2.33 Whilst attractive due to its simplicity, we do not consider this methodology as fair as it fails to consider variations between assets that may cause certain assets to be more costly than others. The approach might under(over) value sections of the network that are more(less) expensive per km or have a longer remaining asset life which might lead to gas consumers receiving less(more) than what they should for the asset.

2.34 In addition, whilst this approach works well in instances where only pipelines are being transferred, if other elements are being transferred this approach may not work as these elements may be over or underrepresented relative to the km of pipeline being repurposed.

Multi-Factor Top-Down assessment methodology

- 2.35 This methodology builds on the above top-down approach to arrive at a proportionally allocated initial estimate of the asset value which is then further adjusted using ratings for factors like its current asset condition, useful life elapsed, and operational efficiency compared to the entire network. Each factor is weighted according to its importance for the hydrogen network and the weighted scores are used to adjust the initial proportional asset estimate.
- 2.36 We do not think this approach is suitable due to its complexity. This methodology requires real historic data to determine the current asset condition of the assets identified for repurposing. It is difficult to obtain this data given the lack of individualised asset data available in the RAV as the values of the assets are aggregated and depreciated methodically. Finding the key inputs of an asset's costs is resource intensive, time consuming, costly, and reliant on robust data which may not be available.

Decommissioning liability

- 2.37 We acknowledge that there is a decommissioning liability associated with gas assets at the end of their useful life. It will be technically difficult to reflect the decommissioning liability in the asset value for several reasons. Firstly, it is unknown how decommissioning costs will be treated for natural gas assets, i.e. if these will sit in RIIO RAV, ahead of government decisions in this area. Secondly, it is also unknown how decommissioning costs will be treated in the hydrogen network RAV. Thirdly, it is unknown what the extent of the decommissioning liability is, for example the future resource and cost burdens of decommissioning a hydrogen network, and to put a value on this. As a result, the methodology does not take a position on how decommissioning liability should be accounted for in the asset valuation. We are cognisant that any transfer of decommissioning liability should ensure that hydrogen consumers are no worse off than the counterfactual of a new build.
- 2.38 Whilst, for the reasons discussed at paragraph 1.8 above, the methodology does not consider decommissioning liability in the asset valuation, we welcome general respondent feedback regarding how the decommissioning liability associated with assets that have been repurposed should be distributed. One option is for the decommissioning liability associated with repurposed assets to be shared between both party's (the natural gas transporters and the hydrogen transporters). We welcome respondent feedback regarding the most suitable way to implement this, particularly given the fact that hydrogen networks may not be decommissioned for a long time period.

Questions

- Q1. Do you agree with our minded-to methodology for the valuation of repurposed natural gas assets, Depreciated Replacement Cost?
- Q2. Do you agree with the inclusion of a bespoke adjustment mechanism to account for any repurposing costs incurred by the gas network before transfer of the assets to make these assets suitable for transfer to a hydrogen network?
- Q3. Do you agree with the inclusion of a bespoke adjustment mechanism to account any repurposing costs incurred by the hydrogen network after transfer of the asset to make the assets useable in a hydrogen network?
- Q4. Which set of consumers, the transferring party or the receiving party, should cost incurred before the transfer of assets that are necessary to make the asset useable in the new network, sit with?
- Q5. Which set of consumers, the transferring party or the receiving party, should cost incurred after the transfer of assets that are necessary to make the asset useable in the new network, sit with?
- Q6. How should decommissioning liability associated with assets that have been repurposed be distributed? What is the most suitable mechanism to facilitate the distribution of decommissioning liability?

3. Request for information on expenditure required for repurposing

In this section we are asking for information regarding the scope and cost of expenditure required for repurposing natural gas assets for reuse in a future hydrogen network. In addition, we are asking for an estimation of the lifespan of the specific assets that could be repurposed.

- 3.1 We expect repurposing costs to include civil engineering costs, specific replaced equipment (e.g. block valves), and recompression costs. We expect that this list is not exhaustive and welcome further additions to it. We also welcome deeper technical breakdown of any mentioned costs.
- 3.2 We welcome information on the likely cost of any specifically mentioned repurposing activities. This information will aide us in assessing the relative importance of repurposing costs therefore where these costs should reasonably sit. We also welcome this cost data in aggregate relative to the cost of building new the equivalent infrastructure.
- 3.3 In addition, we expect expenditure may be required by the gas asset owner ahead of repurposing for use in a hydrogen network to make sure that the hydrogen network receiving the asset can be confident that repurposing will be viable. We welcome information of what activities will be required and any cost estimates associated with these that you can provide.
- 3.4 Finally, we welcome information regarding estimations of the likely lifespan of natural gas assets that could be repurposed.

- Q7. What activity/expenditure is likely to be required after the transfer of the asset to the hydrogen network licensee to allow the natural gas asset to be used in a hydrogen network?
- Q8. What activity/expenditure is likely to be required before the transfer of the asset to the hydrogen network licensee to ensure that the asset will work within the hydrogen network?
- Q9. Can you provide a cost estimation for any expenditure item mentioned in response to Q7 or Q8?
- Q10. What is the expected lifespan of specific assets that could be repurposed?

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4. Your response, data and confidentiality

Consultation stages

- 4.1 The consultation will be open until 01 07 2025. Responses will be reviewed and the consultation decision will be published in Q3/4 2025.

Stage 1

Consultation opens 20/05/2025.

Stage 2

Consultation closes 01/07/2025

Stage 3

Responses reviewed and consultation decision published Q3/4 2025.

How to respond

- 4.2 We want to hear from anyone interested in this consultation. Please send your response hydrogen.systems@ofgem.gov.uk
- 4.3 We've asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.
- 4.4 We will publish non-confidential responses on our website at www.ofgem.gov.uk/consultations.

Your response, your data and confidentiality

- 4.5 We may share a copy of your response with DESNZ for the purposes of informing work on the HTBM regarding asset repurposing. You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to our duties or obligations to disclose information, for example, under the Gas Act 1986, the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.
- 4.6 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.

- 4.7 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.
- 4.8 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

General feedback

- 4.9 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:
1. Do you have any comments about the overall process of this consultation?
 2. Do you have any comments about its tone and content?
 3. Was it easy to read and understand? Or could it have been better written?
 4. Were its conclusions balanced?
 5. Did it make reasoned recommendations for improvement?
 6. Any further comments?

Please send any general feedback comments to stakeholders@ofgem.gov.uk

How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the 'notify me' function on a consultation page when published on our website. Choose the notify me button and enter your email address into the pop-up window and submit.

ofgem.gov.uk/consultations

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Would you like to be kept up to date with *Consultation*
name will appear here? subscribe to notifications:

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Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

Upcoming > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

Appendix 1 – Privacy notice on consultations

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Your personal data may be shared by us with DESNZ where necessary for the purposes of informing work on the HTBM regarding asset repurposing. We will share your data if we are required to do so by law.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for 12 months after the project is closed, including subsequent projects or legal proceedings regarding a decision related to this consultation.

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas

9. Your personal data will be stored in a secure government IT system.

10. More information For more information on how Ofgem processes your data, click on the link to our "[ofgem privacy promise](#)".