

Date

24th February 2025

Catherine Warrilow

The Office of Gas and Electricity Markets

10 South Colonnade

Canary Wharf

London

E14 4PU

Correspondence sent by email to ReopenerConsultations@ofgem.gov.uk

Dear Kate,

Consultation on RIIO-2 NZASP Re-opener Draft Determinations: NGN Birkshall Rationalisation and Relocation Works Project

Further to our recent email discussion, I am writing to seek clarification on the draft determination regarding NGN's Birkshall Rationalisation and Relocation Works Project, submitted under the NZASP re-opener mechanism. [Redacted]

Whilst we are supportive of the broader Bradford Low Carbon Hydrogen (BLCH) project and its objectives, we believe that the determinations for this NZASP re-opener application, relating to the relocation of natural gas assets, should include Ofgem's rationale and Impact Assessment for the decision on who pays for the relocation of these Gas Transportation assets.

In other circumstances the organisation requesting the relocation of the assets, for example wind farms or biomethane customers, would pay directly for this to be undertaken. However, Ofgem's draft determination proposes that all gas customers in NGNs' network would pay for this move, requested by an NGN affiliate (BLCH), through transportation revenues.

Visibility of the rationale for this determination will be important for stakeholders, including those that have paid directly for asset relocations, to understand why this project/scenario is different to other requests for asset relocation. It is also important for other Gas Transporters when considering future projects.

If you require any further clarification regarding this response, please contact me on [Redacted].

Yours sincerely,

[By email]

[Redacted]