



TRITON POWER

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**Draft Determinations: East Coast and Hyline Cymru hydrogen network FEED funding applications**

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Triton Power strongly agrees with the overarching statement “Hydrogen networks may be vital to connect producers with consumers of hydrogen and to balance misalignment in supply and demand. We consider that there is consumer value in providing some funding for the highest priority hydrogen feasibility and FEED studies. The studies will assist understanding of the costs of hydrogen infrastructure and the proposed level of repurposing that could be expected to reduce the stranding risk of existing gas network assets.”

Given our headquartered location, this consultation feedback provides our input in relation to the draft determinations for the East Coast activities, however would be broadly applicable to any of the four hydrogen network FEED projects.

With our CCGT (CHP) at Saltend, East Yorkshire, as well as our assets at Deeside and Indian Queens, we continue to see the vital importance of the National Gas Transmission network to the future of the GB energy network across almost any time horizon and energy transition scenario. Sites such as ours – heavily integrated with global industries - will be needed in order to decarbonise without deindustrializing. CCGTs provide a level of energy security, provide the flexible and dispatchable power necessary to support a high renewables grid, and – with future build out – the capability to provide an important energy vector which it is hard to see a high renewables grid functioning without.

Future hydrogen production also provides the opportunity to balance the electricity grid on both sides – making use of excess renewables and storing the resulting Hydrogen until it is needed for when the wind doesn't blow and the sun doesn't shine.

Should suitable government support be provided, we have plans at Saltend to convert our existing Gas Turbines to be capable of burning a 30% blend of hydrogen. In our view this is a necessary, low regrets first step in order to prove out how the future hydrogen economy - and hydrogen to power in particular - can evolve. It would do so with sensible and realistic early-years Hydrogen production volumes, whilst maintaining the technical capability to still function with 100% natural gas in the event of any Hydrogen supply issues. This is a vital component for GB's energy security.

In order to achieve this functioning H2 economy across all time horizons, we understand a complex supply/demand, storage and transport puzzle needs to be solved – particularly in the early stages. Distribution system blending could play a part in being the offtaker of last resort, however we have concerns regarding transmission system blending as follows:

- Technically; 100% natural gas networks are likely to be needed close to power stations for the safe start up and shut down of Hydrogen fuelled turbines
- Commercially/contractually; There is a notable conflict between HPBM related contracts and NTS blending – HPBM activities have focussed on securing offtakers who will perform



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on site H2 consumption and their own on-site blending. These contracts and associated offtake volumes will be frustrated if the natural gas arriving at the battery limit already contains Hydrogen.

With regards the specific FEED study activity, we would therefore respond as follows:

- Ruling out the parallel new build assessment is likely to add time to the overall review/delivery, as based on both capabilities and offtaker requirements for certain parts of the Transmission system, we would view more new build / parallel networks being required than is perhaps currently envisaged (we would consider the new network piece necessary rather than optional in some areas).
- Ruling out the enabling activities : in our view, a credible FEED of this magnitude needs to cover as a minimum close engagement with the supply chain and the parallel development of appropriate new standards. Efficiencies in delivering these aspects should be possible; new standards should be developed with extensive supply chain and wider industry engagement – Hydrogen is by no means a new molecule to handle.

We trust this brief feedback is useful to your ongoing considerations, and remain open to further discussion at any point.