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Via email: RIIO3@OFGEM.gov.uk

26th August 2025

**Ref: RIIO-3 Draft Determinations – Gas Transmission**

Dear RIIO-3 Team,

We welcome the opportunity to respond to Ofgem’s consultation on the RIIO-3 Draft Determinations for the Gas Transmission network. National Gas Transmission (NGT) have a responsibility to maintain and upgrade their existing network to ensure a reliable gas supply which is crucial to maintaining the output from RWE’s existing gas power stations and underpins our future plans for carbon capture and storage.

RWE has one very specific point of feedback to the draft plan, so please find this in our response to GTQ26 below.

**About RWE**

RWE is the leading power generator in the UK, with a diverse operational portfolio of onshore wind, offshore wind, hydro, biomass and gas. RWE operates around 7GW of modern and efficient gas-fired capacity in the UK and has plans in place to retrofit two of our existing gas power stations – Pembroke and Staythorpe - to enable carbon capture and storage, as well as to build a new, up to 900MW CCS-enabled CCGT at Stallingborough. In February 2024, we announced an additional carbon capture feasibility study at our 400MW Great Yarmouth Power Station, bringing our total pipeline of CCS projects to 4.6GW of secure, flexible, low carbon electricity. These projects will help maintain electricity security of supply while contributing to the decarbonisation of the electricity grid and supporting hundreds of high quality jobs.

**RWE’s response to GTQ26: Do you agree with our proposed design of the Maintenance incentive for RIIO-GT3?**

We do not agree with the proposed design of the Maintenance incentive.

RWE supports the increase in investment in the gas transmission system compared to RIIO-2, as this is essential for maintaining system reliability. However, the scale of the proposed investment will require a significant ramp-up in NGT’s maintenance activities. A key element of the RIIO-3 plan should therefore be ensuring that appropriate incentives are in place to support the effective delivery of this expanded maintenance programme.

Under current UNC arrangements, maintenance can take place outside the designated maintenance window (April to October), provided affected users give their consent. This flexibility appears to be working well. However, under the proposed RIIO-3 design, NGT would not receive an incentive for maintenance carried out outside this window. For certain maintenance activities requiring pipeline flows—such as some online inspections (pigging)—users may prefer these to be scheduled in the shoulder months, rather than during the peak summer period. Yet under the proposed framework, NGT would only be rewarded for conducting maintenance between April and October.

We believe this incentive structure was a major factor behind NGT’s decision to raise UNC modification proposal UNC907 in February 2025. This proposal seeks to extend the current maintenance period from 1 April – 31 October to 1 March – 30 November, thereby giving NGT the right to impose maintenance on Network Users during March and November.

RWE had significant concerns about the original version of this proposal. If one of our larger gas generation sites were subject to a planned shutdown in November, for example, we would be unable to meet our Capacity Market delivery obligations during periods of electricity system stress. These obligations are proportional to demand, and since demand can peak in November, we are required to be available to deliver full capacity in that month. Importantly, DESNZ’s Capacity Market procurement target does not make allowances for planned maintenance outages during the winter months.

In response to industry feedback, NGT has since revised the proposal to allow only for online inspections and routine valve operations during March and November. However, while these activities often still need some offtake from the transmission system, they typically require that offtake to be significantly reduced, which would mean a very material reduction in output from our power stations. This typical reduction would prevent us from meeting our Capacity Market obligations during the proposed extended maintenance period, which remains a serious concern for overall system security.

In our experience, NGT takes a highly collaborative approach to maintenance planning. We believe the safest and most effective way to manage an expanded maintenance programme is not by granting NGT additional rights to impose maintenance on users, but by recognising and incentivising cases where NGT secures user consent for maintenance activities.

Therefore, we believe the proposed maintenance incentive should be revised to include maintenance carried out outside the April–October window, provided it is undertaken with the consent of the affected Network Users.

Yours faithfully,

Lauren Jauss

Head of UK Markets and Performance Improvement

RWE Supply & Trading GmbH