

To: strategicplanning@ofgem.gov.uk

1 September 2025

National Gas Transmission's CSNP draft Guidance Consultation Response

Dear Sir/Madam,

Thank you for the opportunity to review and comment on the Centralised Strategic Network Plan (CSNP) Guidance. We offer this written response that provides both context and meaning to the direct questions answered below in the appendix, and also provides Ofgem with our wider perspective on the whole energy systems of the future. This letter and appendix is non-confidential and can be published.

We also separately provide a copy of our response to NESO's recent CSNP draft Methodology consultation as attachments to this response to provide further context on our views of the role of CSNP.

National Gas Transmission (NGT) is responsible for the physical infrastructure of the National Transmission System (NTS), ensuring that it is safe, reliable, and efficiently managed. This includes meeting our obligations and delivering the services required by our customers, such as long-term investment and maintaining the overall asset health of the system. NGT also acts as the System Operator, overseeing the real-time operation of the NTS, balancing supply and demand, and providing capacity and operational flexibility to support the economic and efficient functioning of the Great Britain (GB) gas market.

Gas and the National Transmission System have a key role to play in the secure and affordable energy supply to consumers up to and beyond 2050.

In addition, we believe that hydrogen and hydrogen networks will play a key role in delivering an affordable and secure transition to net zero; this is reflected in the comments we have provided.

We would like to seek further clarity on where this guidance falls within the current "in train" process for CSNP that NESO are progressing; our comments assume this is the CSNP Guidance for the 2030 issue of CSNP.

We recognise the importance of a holistic view across all energy vectors if GB is to achieve an energy secure transition to Net Zero by 2050. The CSNP will be a critical process in helping to shape the design of the future energy networks. Overall, we fully support such a process; our

comments are focused on ensuring that the development of the process is comprehensive, transparent and robust to enable us to meet the energy challenges in the near and long term.

Overall, we think the draft guidance is appropriate and reflects the policy intent of the CSNP at a high level. However, we feel there is a lack of detail on the processes that the CSNP needs to follow to achieve its goal to be an overarching whole system network plan for GB. Specifically, governance, supply/demand information, whole system thinking and the development of hydrogen need more detail for us to form an opinion on whether the CSNP will actually be fit for purpose.

With this in mind, specifically we believe that further details are needed on how CCUS networks will be included in the CSNP. CCUS networks will interact with the development of all the energy vectors and therefore we believe that there needs more detailed information on how CCUS networks will be included within the assessments of whole systems and individual energy vectors.

While we recognise that this is the first iteration of these documents and suite of interacting plans, we would welcome more clarity on the details of how the processes and methodologies within the CSNP will work. Examples of areas where we believe the guidance could go into more appropriate detail are the particular use of Strategic Spatial Energy Plan (SSPE) and Future Energy Scenarios/Pathways (FES/FEP) to forecast supply and demand; the types and methods of stakeholder engagement; and the membership of the challenge and governance groups for CSNP.

We note that the CSNP methodology for hydrogen is to be developed in detail starting in December 2025 and we would welcome being included in this as a key industry player and to utilise the experience and expertise we have already gained in hydrogen. The guidance document suggests that there should be an industry group set up to review the processes. We agree that such a group should be set up as a matter of urgency to provide input, challenge and review to the current in train CSNP.

If you have any questions or comments on this response, please do not hesitate to contact Paul Sullivan (paul.j.sullivan@nationalgas.com) for Natural Gas, Malcolm Arthur (malcolm.arthur@nationalgas.com) for Hydrogen or James Abrahams (james.abrahams@nationalgas.com) for CCUS.

Yours faithfully,



Paul Sullivan
Head of System Capability & Risk

Appendix: Responses to specific questions

Q: Do you agree that Chapter 2 – developing and submitting the CSNP Methodology – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: We agree with the detail behind Chapter 2, the guidance provides a good summary of some of the areas that will need to be considered in the development of the CSNP. However, we believe that more detail is needed on all the processes and methodologies that will be used to develop the CSNP and how these processes and methodologies will be agreed with key stakeholders. For example, it would be beneficial stakeholder engagement to go beyond just webinars, such as working groups and having consultations with industry experts, this will allow for more effective multiway discussions between all relevant stakeholders. However, we cannot agree that the policy intent of the CSNP has been met as there remains a lack of detail on how the processes and methodologies will be implemented and work in practice.

Q: Do you agree that Chapter 3 – general requirements applying to all CSNP stages – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: We mostly agree, but we do have some reservations and suggest some additions are considered, examples as below. Whilst the guidance provides some further clarity on the detail of the processes and methodologies that will be used to develop the CSNP, we cannot agree that the policy intent of the CSNP has been met as there remains a lack of detail on how the processes and methodologies will be implemented and how they will be agreed with key stakeholders. There also appears to be nothing in place to show that NESO will or will not implement feedback with reasons for their decisions.

We feel that the CSNP methodology should include CCUS and biomethane, as it is mentioned in Chapter 4 but not Chapter 3. In addition to this the referenced paper “Midstream gas system: update to the market” involves the Gas Distribution Network’s LTS and LP networks, we believe the CSNP should solely focus on the NTS for gas, with the RESP taking on the methodologies for the GDNs as asserted in Chapter 4 paragraph 4.11.

As a general comment, the guidance document states that network owners will be engaged with the development of the energy system. Whilst this is applicable for gas and electricity, this does not apply (at present) for hydrogen. Therefore, an alternative set of stakeholders, such as hydrogen project development leads or actively developing projects, should be included for hydrogen considerations.

Q: Do you agree that Chapter 4 – Stage 1: model future energy supply and demand – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree

A: As outlined in our previous answers, whilst the guidance provides some further clarity on the detail of the processes and methodologies that will be used to develop the CSNP, we cannot agree that the policy intent of the CSNP has been met given the lack of detail on how the processes and methodologies will be implemented and crucially how they will be agreed with key stakeholders.

The draft guidance is specific about the supply and demand information coming from SSEP, we would find it beneficial if the guidance was specific about the information coming from FES/FEP too, such as the GDN forecast flows and industrial customers. Furthermore, we believe it important for there to be more detail on how the SSEP will be utilised and supplemented by FES/FEP. It is unclear what links SSEP and FES/FEP for power generation and hydrogen production, inconsistency in the way this data may be used could occur if these processes/documents are not totally aligned leading to different investment outcomes. We are also concerned that there is no mention of whether sensitivities, such as high LNG supply and High Continental interconnector supply will be used, but we believe they should.

In paragraph 4.15 the draft guidance is unclear as to the roles and accountabilities with regards to the repurposing of gas assets; we believe this accountability appropriately resides with NGT as the NTS owner and operator. In addition, we believe that any assessment of the potential for repurposing assets should only be considered with a detailed assessment of the risks and benefits which the network owner/operator is best placed to conduct.

Q: Do you agree that Chapter 5 – Stage 2: identifying system needs – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: It would be appropriate to include some fundamental elements of the gas system need, for example network resilience, asset risk/reliability and 1-in-20 considerations should be included when identifying system needs. It is difficult to determine the validity of the methodologies for determining physical capabilities and resilience in accordance with the SSEP without first seeing the outputs of the SSEP and how NESO will utilise these results. NESO have not specified the required level of future physical capability and resilience of the NTS within the GNCNR thus far. NGT assess the level of capability needs on a risk/cost approach using Cost Benefit Analysis (CBA), not as a required, absolute, level, therefore we would advocate for this stipulation to be removed from future guidance.

Paragraph 5.31 quotes “system need early in the CSNP cycle”, this does not tie in with the current GNCNR-SPOP-GOA timetable. The next proposed iteration of the CSNP is currently Q2 of 2027, then 2030, with the next GNCNR not currently planned until Q4 2026 then 2028 if a 2 year cycle is retained. We are aware that there are consideration ongoing over the timetable for these processes which may help to alleviate this discrepancy.

Q: Do you agree that Chapter 6 – Stage 3: identifying options – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: We support most of the draft Guidance in this section and welcome the focus on options and optioneering and the inclusion of repurposing and new build for gaseous energy vectors beyond natural gas and hydrogen. However, we have reservations about live data sharing in terms of security and CNI systems and disagree with paragraph 6.43 that the licensee may possibly work entirely independently from NGT (as the network owner/operator) to develop options for the NTS, we have industry experience and expertise in this area which should be utilised. We endorse the repetition of the guidance on hydrogen production and storage as energy solutions.

We would like to clarify that NESO's role in leading a review of existing codes and developing new codes if required, in relation to gas and hydrogen, is as a code signatory not as a code manager.

Q: Do you agree that Chapter 7 – Stage 4: decision-making framework – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: There are some good considerations within this chapter, however further clarity is needed regarding how the licensee intends to engage with its stakeholders in the development of methodologies, and to what extent the stakeholders' input will be implemented in the final solutions. Additionally, the decision-making framework lacks detail on the methodologies to be used for assessing and quantifying the economic, environment and social impacts. We believe it is key CSNP justifies the approaches adopted when trade-offs are made between competing objectives. We believe it is key that governance structures are elaborated upon and detailed so that it is clear where decision making powers lie and how all necessary parties can contribute to the process in a meaningful way.

Q: Do you agree that Chapter 8 – develop a CSNP – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: Yes. The only amendment we would seek is to paragraph 8.16 concerning clear documentation of how options were shortlisted etc, in that where this information relates to the gas network, we would also want access to this documentation.

Q: Do you agree that Chapter 9 – Stage 6: handover to a delivery body – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree.

A: We note that Chapter 9 is highly electricity focused, this may be appropriate given the licence and commercial framework that it operates within. Where it refers to hydrogen, we welcome the openness that hydrogen delivery mechanisms still need to be established and therefore would encourage the hydrogen CSNP methodology detail to be established as soon as possible, alongside expert industry input. We would advocate that the RIIO process not be excluded for hydrogen at this stage. We also agree that the use of the reopener approach for CSNP gas projects is an appropriate solution. We would additionally call out 1 in 20 peak day security of supply in paragraph 9.30 as a Security of Supply consideration.

Q: Do you agree that Chapter 10 – Other planning roles in CSNP – adequately reflects the policy intent of the CSNP? Please provide the reasons and any alternative suggestions if you disagree. We're proposing that offshore connections should be planned within the scope of the CSNP. We set out our requirements on the licensee with regards to this additional scope (see chapter 10: Electricity – offshore network planning in the CSNP). What are your views on this proposal?

A: This chapter focuses on electricity. However, we believe that how the CSNP will consider any developments in both gas and hydrogen interconnection needs to be explicitly outlined. Gas

interconnection plays a significant role in the existing gas network and will continue to play a significant role into the future. In addition, it is not clear how the role of LNG will be considered in the management and development of the network. LNG continues to play a critical role in shaping how the network is managed, and is likely to play an increasing role in supplying gas to the GB market. Further information on how LNG will be included within the CSNP to better understand the potential impacts of this key resource for security of gas supply of GB is desirable.

In addition, hydrogen interconnection via pipelines could play a significant role in the development of the hydrogen network, with the opportunity to provide low carbon hydrogen to mainland Europe and connect to Ireland and Northern Ireland.

We also believe that there is potential for offshore hydrogen production that will interact with both electricity and hydrogen network developments onshore and offshore. Therefore, we believe that offshore hydrogen should be explicitly included in the CSNP.

Q: 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?

A: We believe a month to respond in the summer holiday season is insufficient. We also believe it is confusing to bring out a guidance consultation so close to the CSNP methodology consultation and the applicability to the current "in train" process for CSNP that NESO are progressing.

2. Do you have any comments about its tone and content?

A: Yes, we believe the tone is good but, as per previous comments, there could be more detail in the content.

3. Was it easy to read and understand? Or could it have been better written?

A: Yes, the document was easy to understand and clear.

4. Were its conclusions balanced?

A: There were no conclusions presented so cannot comment.

5. Did it make reasoned recommendations for improvement?

A: Yes. However, the consultation document does require some additions and clarity as highlighted by our feedback to the questions.

6. Any further comments?

A: There are some inconsistencies in the naming conventions used for FEP Falling Short and Counterfactual, with them seeming to be used interchangeably when the naming convention is stated to have changed.