Independent Gas Transporter Uniform Network Code (IGT UNC) IGT176: Changes to IGT UNC to enable UNC0887 'Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS' UNC176

Decision:	The Authority[1] determines that this modification should be made[2]
Target audience:	IGT UNC Panel, Parties to the IGT UNC and other interested parties
Date of publication:	1 December 2025
Implementation date:	To be confirmed by the code administrator.

Background

Currently, the Independent Gas Transporter Uniform Network Code (IGT UNC) includes provisions relating to the direct entry of gas from an IGT network onto the National Transmission System (NTS).[3] However, it is silent on how gas flows from the NTS to an IGT network and onward to consumers should be treated.

Similarly, prior to the implementation of UNC0887 – "Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS", the UNC Independent Gas Transporters Arrangement Document (IGTAD)[4] applied only to the conveyance of gas between Distribution Network

[1] References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.
[2] This document is notice of the reasons for this decision as required by section 38A of the Gas Act 1986.
[3] IGT172 and established the arrangements for flowing gas from an IGT onto the NTS.
[4] The Independent Gas Transporters' Uniform Network Code can be found here: IGT UNC and Related Documents - IGT UNC

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

Operators (DNOs) and IGTs, with the NTS being outside its scope. With this modification in place, the UNC will allow for National Gas Transmission (NGT) to offer services to IGTs as a 'Large Transporter'. However, to facilitate full implementation of UNC0887, an enabling modification under IGT UNC is required to bring the code arrangements into alignment, to allow the bi-directional flow of gas between IGTs and the NTS.

The modification proposal

IGT176, raised by CNG Services Ltd ('The Proposer') on 19 March 2025, proposed to modify the IGT UNC to codify arrangements between Pipeline Users and Pipeline Operators, making the Cross-Code arrangements work and enabling the implementation of UNC Modification UNC0887.

To facilitate UNC0887, IGT176 proposes the implementation of the following changes:

- Minor definitional changes, including but not limited to adding NGT as a 'Large Transporter' alongside DNOs,
- replication of the non-Central Switching Services (CSS) provisions established in the UNC, allowing the Supply Point Administration (SPA) for an indirectly connected NTS exit to be treated identically to direct connect equivalents,
- addition of the right for IGTs to insist on an equivalent to a Network Exit Agreement (NExA), in line with an amendment to IGTAD Section G4 proposed as part of UNC0887,
- introduction of non-charging related provisions similar to those applicable to NTS entry outlined in UNC TPD Section J. This applies to Pipeline Operators and Pipeline Users when gas is entered directly into an IGT network from a gas

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

delivering facility for onward conveyance to the National Balancing Point ('NBP') via the NTS.

IGT UNC Panel[5] recommendation

At the IGT UNC Panel meeting on 29 August 2025, the IGT UNC Panel unanimously considered that IGT176 would better facilitate the IGT UNC objectives and the Panel therefore recommended its approval.

Having considered all consultation responses, the Panel agreed with the proposer that IGT176 would have a positive impact on Relevant Objectives ('ROs') (a), (b), and (d), with no impact identified for the remaining ROs.
In examining the potential impact of IGT176 on consumers, the Panel unanimously agreed that the Modification would positively impact the Consumer Benefit Areas of "Reduced Environmental Damage" and "Benefits for Society as a Whole", with no impact identified on the remaining Consumer Benefit Areas.

Our decision

We have considered the issues raised by the modification proposal and the Final Modification Report (FMR) dated 2 September 2025. We have also considered and taken account of the responses to the industry consultation on IGT176 which are attached to the FMR.[6] We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the relevant objectives of the IGT UNC[7]

[5] The IGT UNC Panel is established and constituted from time to time pursuant to and in accordance with the IGT UNC Modification Rules
[6] IGT UNC modification proposals, modification reports and representations can be viewed on the IGT UNC website at Welcome to IGT UNC
[7] As set out in Standard Condition 9 Gas Transporters Licence, available at: Licences and licence conditions | Ofgem

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

- directing that the modification be made is consistent with our principal objective and statutory duties.[8]

Reasons for our decision

We consider this modification proposal will better facilitate IGT UNC ROs (a), (b) and (d), and will have a neutral impact on the other ROs.

The Panel invited representations on the Modification from interested parties on 28 July 2025. It received a total of seven responses to the consultation. The modification was supported unanimously, with all seven respondents recommending its implementation. No negative impacts of the modification upon the ROs were identified by any of the consultation respondents.

(a) the efficient and economic operation of the pipe-line system to which this licence relates.

Panel Members considered the Modification would have a positive impact on RO (a). Agreeing with the argument made by the Proposer, the Panel considered that the new IGT network entry service proposed by the modification would enable more biomethane connections, in turn enabling increased competition and enhanced diversity of supply.

Four consultation respondents stated that the modification would have a positive impact on RO (a) and expressed views consistent with the Proposer's view.

[8] The Authority's statutory duties are wider than matters which the Panel must take into consideration and are detailed mainly in the Gas Act 1986.

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

We agree that this modification would have a positive impact on the RO (a) by increasing the number of available biomethane connections, enabling greater injection of green gasses into the network. This, in turn, should facilitate growth in domestic biomethane production, increasing security and diversity of supply while enabling increased competition and ensuring efficient and economic operation of the system.

(b) so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of the pipe-line system of one or more other relevant gas transporters.

Panel Members considered the Modification would have a positive impact on RO (b). Agreeing with the argument made by the Proposer, the Panel considered that in enabling a new IGT network entry service based on and aligned with the existing UNC equivalent the modification would ensure consistent processes across both the UNC and IGT UNC frameworks.

Three consultation respondents stated the modification would have a positive impact on RO (b) and expressed views consistent with the Proposer's view.

We agree that this modification would have a positive impact on RO (b) by facilitating co-ordination across the whole gas system through consistent processes across both the UNC and IGT UNC frameworks, enabling more effective system planning and efficient use of GB pipeline systems.

(d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition between relevant shippers and between relevant suppliers.

Panel Members considered the Modification would have a positive impact on RO (d).

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

Making a positive difference for energy consumers

Agreeing with the argument made by the Proposer, the Panel believed that, in facilitating gas entry, the modification would increase supply and, in turn, potentially facilitate effective competition among Shippers and Suppliers. Likewise, the Panel agreed with the Proposer that the modification would facilitate competition between Gas Transporters in ensuring appropriate arrangements for all entry options.

All consultation respondents agreed that this modification would have a positive impact on RO (d) and expressed views consistent with the Proposer's view. When commenting on this modification proposal better facilitating RO (d), several respondents also noted that it would have a positive effect on net zero ambitions.

We consider that this modification would have a positive impact on RO (d) by enabling the implementation of UNC0887 and thus facilitating the entry of gas from IGTs into the NTS. By enabling these additional means of entry, it may provide greater capacity onto IGT networks, in turn reducing the risk of production curtailment caused by insufficient capacity. This increase in capacity may, likewise, allow for a greater number of producers to connect, in turn increasing the capacity for green gas on the GB network.

We also consider that by expanding the biomethane gas-to-grid market this modification may drive increased competition between Shippers, which would, in turn, increase the number of active market participants and may help to drive down prices.

This modification may also increase competition between DNOs by expanding connection options for biomethane producers, meaning they would no longer be restricted to connecting only where an existing network can provide capacity.

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk

Our principal objective and statutory duties

The Authority's principal objective is to protect the interests of existing and future consumers in relation to gas conveyed through pipes and electricity conveyed by distribution or transmission systems.

We consider that this modification has the potential to provide some benefit to consumers. In enabling the implementation of UNC0887, IGT176 will help to facilitate the entry of additional gas into the NTS via IGT Pipelines, potentially increasing the amount of total gas available. This, in turn, would enhance security of supply overall which would benefit consumers.

Additionally, by enabling the introduction of more renewable gasses onto the network, this modification may contribute to meeting net zero targets. Finally, in expanding entry arrangements and providing greater capacity for producers to connect to the network, this modification should likewise facilitate growth in domestic biomethane production. As such, we consider that this modification will have a positive impact on consumers.

Decision notice

In accordance with Standard Special Condition A11 of the Gas Transporters licence, the Authority hereby directs that modification proposal IGT176: '*Facilitating Bi-Directional Connections Between IGT Pipelines and the NTS*' be made.

William Duff

Head of Gas and Hydrogen Systems Markets and Operations

Signed on behalf of the Authority and authorised for that purpose.

The Office of Gas and Electricity Markets
10 South Colonnade, Canary Wharf, London, E14 4PU Tel 020 7901 7000
www.ofgem.gov.uk