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13<sup>th</sup> November 2025

**Modifying the special conditions of the NGT gas transporter licence: statutory consultation | Ofgem**

Dear Jonathan,

This letter is in response to your above consultation which proposes to modify Appendix 1 and 2 of Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution).

We welcome the opportunity to respond to the above consultation. This response is provided on behalf of National Gas Transmission plc as Licensee and in its role as owner and operator of the Gas Transmission System in Great Britain.

We agree with the proposed marked changes to be made to Appendix 1 and 2 of Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution) which primarily brings the licence baseline tables up to date with changes already made through both the PARCA application allocations and long-term exit capacity auction substitution allocations processes.

We note that the Teesside baseline capacity number included of 599.41 (not marked for change) is not consistent with the current Licence Baseline of 445.09 Gwh/d.

**Substitution of Capacity**

As outlined in your consultation, changes are required in order to update the licence baseline tables to align with changes already made due to either PARCAs or long-term exit capacity auction substitution allocations.

We can confirm that these processes have been followed, and industry notices given at the time and the data published by National Gas updated as a result.

**New points**

We support your proposal to add the new exit and entry point for Glenthams.

Glenthams is both a Direct Connect 'DC' Exit Point and a Biomethane Entry Point. We suggest that the type of entry for the NTS Entry Point of Glenthams is changed to Biomethane (currently proposed as DC) and this is moved to the end of the table in Appendix 1.

Glenthams is currently included in the tables of Zero Licence Baseline for Entry and Exit Capacity Points and this proposal would move both Glenthams entry and exit points into the Licence Baseline tables within Appendix 1 and 2 of Special Condition 9.13 (Capacity Requests, Baseline Capacity and Capacity Substitution). If this were to be effective, then Glenthams would be removed from the tables of Zero Licence Baseline for Entry and Exit Capacity Points, which are published within the Long Term Summary Report ([Capacity reports](#)). This is a separate document to the GT Licence which is in accordance with Special Condition 9.13 part E of the GT Licence. Previous Notices related to Glenthams can be found here. [NewZeroLicenceBaselinePointnoticeGlenthams.pdf](#)

We note that a relevant point consultation was conducted (concluding in April 2024) and that Glenthams DC (Exit) and Glenthams Biomethane (Entry) are classified as excluded from the definition of relevant points under Article 18 (4) of Regulation (EC) 715/2009 as they will each be connected to a single final customer. The notice relating to this can be found here: [EURelevantPointConsultationGlenthamsReport.pdf](#)

### **Subsequent RIIO-T3 consultation**

Our understanding is that Ofgem intends to issue a statutory consultation which will include the Capacity Requests, Baseline Capacity and Capacity Substitution condition for RIIO-3 in December 2025. Regardless of whether this October 2025 consultation has been concluded at the point at which Ofgem issues its December statutory consultation we expect the proposals outlined within this consultation (and such amendments as Ofgem considers appropriate to adopt) to be included within Ofgem's December statutory consultation on RIIO-3 licence condition albeit that these may not yet be in effect in our RIIO-2 licence at the point at which the December statutory consultation is opened.

If you have any questions regarding any points raised in this response, then please do not hesitate to contact me at [Malcolm.montgomery@nationalgas.com](mailto:Malcolm.montgomery@nationalgas.com)

Yours sincerely,

Malcolm Montgomery  
Commercial Codes Change Team Manager