

Consultation

Peterborough Compressor Emissions – Re-opener Application

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In June 2025 National Gas Transmission submitted an application for a direction to modify the outputs, delivery dates and allowances set out in in Appendix 2 of Special Condition 3.11 Compressor Emissions Re-opener and Price Control Deliverable. This document sets out our assessment of the evidence presented in this application and our minded to decision on the modification of outputs, delivery dates and allowances set out in in Appendix 2.

We are seeking views on our minded to decision and several specific questions from interested stakeholders, including network companies, gas shippers, consumer groups, environmental groups, and the public. The responses we receive will be considered before our final decision is issued.

We want our consultation process to be transparent and intend publishing non-confidential responses on our website www.ofgem.gov.uk/consultations alongside our final decision. If you want any part of your response to remain confidential this should be clearly highlighted, with confidential material included in separate appendices if possible.

Consultation Peterborough Compressor Emissions – Re-opener Application

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Contents

Executive summary	5
Peterborough Compressor Emissions – Re-opener Application	5
Next Steps.....	6
1. Introduction	7
Purpose of this consultation	7
Consultation stages	7
How to respond	7
Your response, data, and confidentiality.....	7
How to track the progress of a consultation	8
2. Compressor Emissions Re-opener and Price Control Deliverable mechanism ...	9
Overview of the Re-Opener mechanism.....	9
3. Peterborough Compressor Emissions Re-opener Application	11
Peterborough Compressor Station Final Preferred Option.....	11
Re-opener Application.....	12
Contract Award and Delivery Strategy.....	14
Main Works Contract Costs	15
Original Equipment Manufacturer Costs	16
Specialist Contractor Costs.....	17
Direct and Indirect Company Costs.....	17
Risk / Contingency Costs.....	19
4. Our assessment and proposed funding decision	20
Questions	21
Our assessment – Needs Case	21
Our assessment – Final Preferred Option Confirmation	21
Our assessment – Alignment with Final Preferred Option	25
Our assessment – Contract Award and Delivery Strategy	25
Our assessment – Main Works Contract costs	26
Our assessment – Original Equipment Manufacturer costs	27
Our assessment – Specialist Contractor costs	29
Our assessment – Direct and Indirect Company costs.....	29
Our assessment – Risk / Contingency.....	30
Our Proposed Funding Decision.....	31
5. Assessment of RIIO-T2 Price Control Deliverable	33
Questions	33

Consultation Peterborough Compressor Emissions – Re-opener Application

RIIO-T2 Price Control Deliverable	33
Our assessment – Delivery of Price Control Deliverables	33
Our proposed CEPRA _t Value.....	34
6. Proposed Peterborough Compressor Emissions Re-opener Direction	35
Questions	35
Our Proposal	35
Appendix 1. Proposed Direction	38
Appendix 2. Privacy policy	42
Personal data	42

Executive summary

Peterborough Compressor Emissions – Re-opener Application

- 1.1 In our RIIO-T2 Final Determinations we accepted the ‘needs case’ for investment at the Peterborough Compressor Station to ensure compliance with the Medium Combustion Plant Directive. The Directive requires that by 1 January 2030 the Nitrogen Oxide (NOx) emissions of all gas turbines with a net thermal input of between 1MW and 50MW, do not exceed 150mg/m³.
- 1.2 However, given the uncertainty about what would become the Final Preferred Option and the level of funding required, we decided that the project would be subject to our Gas Transmission Project Assessment Process. This two-stage process is set out in Special Condition 3.11: Compressor emissions Re-opener and Price Control Deliverable (CEPt and CEPREt).
- 1.3 In compliance with Special Condition 3.11, National Gas Transmission submitted a Final Option Selection Report in January 2023. This identified the Final Preferred Option as being the replacement of the existing Avon engine with a new Directive compliant gas turbine driven unit. In November 2023 we published our decision to approve this as the Final Preferred Option and the basis for any Re-opener application.
- 1.4 In June 2025 National Gas Transmission submitted a Re-opener application seeking a direction by the Authority to modify:
 - The value of the relevant licence term (CEPOt) increasing it by £115.992m; and
 - The outputs, delivery dates and allowances that specify the parameters of the Price Control Deliverable.
- 1.5 Having considered the evidence presented in the Re-opener application, we propose increasing the value of the relevant licence term (CEPOt) by £99.568m, which is £16.352m lower than the value submitted by National Gas Transmission in its Re-opener application. Our proposal is based on our assessment that the allowance for:
 - Risk / Contingency should be reduced by £13.033m to £(Redacted)m; and
 - Indirect Company Costs should be reduced by £3.391m to £(Redacted)m.
- 1.6 We also propose to amend the outputs, delivery dates and allowances that specify the parameters of the Price Control Deliverable as set out in Table 18 below.

Next Steps

- 1.7 We welcome responses to our consultation, to the specific questions we have included in Chapters 4 and 5. Please send your response to graham.craig@ofgem.gov.uk by 5 May 2026. We expect to publish our final decision and direction modifying the licence terms no later than 1 July 2026.

1. Introduction

Purpose of this consultation

This consultation sets out our minded to position to increase National Gas Transmissions price control allowances by £99.568m following an application submitted in June 2025 for £115.922m under Special Condition 3.11 Compressor Emissions Re-opener.

This consultation sets out our assessment of the evidence presented in the application and the various factors we have considered when reaching our minded to position. We are seeking views from interested stakeholders on our assessment of the evidence and our minded to position.

Consultation stages

Stage 1 Consultation open: 7 April 2026

Stage 2 Consultation closes (awaiting decision). Deadline for responses: 5 May 2026

Stage 3 Responses reviewed and published: 1 July 2026

Stage 4 Consultation outcome (decision)

How to respond

We want to hear from anyone interested in this consultation. Please send your response to the person or team named on the front page of this document.

We have asked for your feedback in each of the questions throughout. Please respond to each one as fully as you can.

We will publish non-confidential responses on our website.

Your response, data, and confidentiality

You can ask us to keep your response, or parts of your response, confidential. We will respect this, subject to obligations to disclose information. For example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations, or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.

If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you do wish to be kept confidential and those that you do not wish to be kept confidential. Please put the confidential material in a separate

Consultation Peterborough Compressor Emissions – Re-opener Application

appendix to your response. If necessary, we will contact you to discuss which parts of the information in your response should be kept confidential and which can be published. We might ask for reasons why.

If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the United Kingdom's withdrawal from the European Union ("UK GDPR"), the Gas and Electricity Markets Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

If you wish to respond confidentially, we will keep your response confidential, but we will publish the number, but not the names, of confidential responses we receive. We will not link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

How to track the progress of a consultation

1. Find the web page for the call for input you would like to receive updates on.
2. Click 'Get emails about this page', enter your email address and click 'Submit'.
3. You will receive an email to notify you when it has changed status.

A consultation has three stages: 'Open', 'Closed (awaiting decision)', and 'Closed (with decision)'.

2. Compressor Emissions Re-opener and Price Control Deliverable mechanism

This chapter gives an overview of the Compressor Emissions Re-opener and Price Control Deliverable mechanism and our assessment process.

Overview of the Re-Opener mechanism

- 2.1 The gas transmission network in Great Britain (National Transmission System) is owned and operated by National Gas Transmission. Economic regulation of the network follows the RIIO (Revenue = Incentives + Innovation + Outputs) price control framework. Our policy on the economic regulation of the network during a price control period is set out in Final Determinations and given effect by Special Conditions in Part C of the National Gas Transmission Gas Transporter licence.
- 2.2 In our [RIIO-T2 Final Determinations](#) we accepted the ‘needs case’ for investment at the Peterborough Compressor Station to ensure compliance with the Medium Combustion Plant Directive. The Directive requires that by 1 January 2030 the Nitrogen Oxide (NOx) emissions of all gas turbines with a net thermal input of between 1MW and 50MW, do not exceed 150mg/m³.
- 2.3 However, given the level of uncertainty with respect to both the ‘preferred option’ and the level of funding required, we decided that the project would be subject to our Gas Transmission Project Assessment Process. This two-stage process is set out in Special Condition 3.11: Compressor Emissions Re-opener and Price Control Deliverable.
- 2.4 In compliance with Special Condition 3.11, National Gas Transmission submitted a Final Option Selection Report in January 2023. This identified the Final Preferred Option as being the replacement of the existing Avon with a new Directive compliant gas turbine driven unit. In November 2023 we published our [decision](#) to approve this as the Final Preferred Option and the basis for any Re-opener application.
- 2.5 Special Condition 9.4 requires that all Re-opener applications must be prepared in accordance with our [Re-opener Guidance and Application Requirements Document](#). This includes guidance on the preparation of Engineering Justification Papers and Cost Benefit Analysis, which are the key tools we expect to be used in preparing any application submitted under Special Condition 3.11. This Re-opener Guidance and Application Requirements Document also sets out the indicative process we will follow when assessing Re-opener applications.

Consultation Peterborough Compressor Emissions – Re-opener Application

2.6 In June 2025 National Gas Transmission submitted a Re-opener application based on the Final Preferred Option. In accordance with our application assessment process, having determined that a valid application had been submitted, we proceeded to a detailed assessment. We determined that the application was valid because as set out in Appendix K (Mapping of Ofgem Requirements) of the Peterborough Compressor Re-opener application, it was:

- Compliant with the requirements set out in Special Condition 3.11 Part D;
- Compliant with the requirement set out Special Condition 9.4.3 to prepare the submission in accordance with our Re-opener Guidance and Application Requirements Document;
- Published on the National Gas Transmission website within five working days of submission with any redactions in line with our Re-opener Guidance and Application Requirements Document; and
- Accompanied by a letter of assurance that met the requirements set out in our Reopener Guidance and Application Requirements Document.

2.7 On 1 April 2026 the RIIO-T3 price control period begins, and Special Condition 3.11 will no longer generally apply. It has been replaced by Special Condition 3.10 Compressor emissions Price Control Deliverable (CEPt) in the RIIO-T3 licence. However, under Special Condition 3.10.8 the Authority may, in respect of applications validly submitted under Special Condition 3.11, modify Appendices 1 and 2 of Special Condition 3.10 in accordance with the principles which were applied by SpC 3. 11.

3. Peterborough Compressor Emissions Re-opener Application

This chapter summarises the Peterborough Compressor Emissions Re-opener application submitted by National Gas Transmission in June 2025.

Peterborough Compressor Station Final Preferred Option

3.1 Peterborough Compressor Station plays a key role in the operation of the National Transmission System. Its role involves:

- The bulk transfer of gas between zones to balance supply and demand;
- Maintaining sufficient linepack stocks in the southern network; and
- Compliance with 1-in-20 obligations (Standard Condition 16 Pipe-Line System Security Standards) in the southeast and southwest of the network.

3.2 Table 1 below provides detail on the three compressor units operating at Peterborough Compressor Station.

Table 1: Peterborough Compressor Units

Unit	Engine	Fuel	Power Base (MW)	Installed
A	Avon	Gas	12.34	1973
D	Solar Titan	Gas	15.3	2022
E	Solar Titan	Gas	15.3	2022

3.3 The two lead units (Units D and E) operating in parallel provide sufficient compression to perform the roles set out in section 4.1. The third unit (Unit A) is required as backup should either of the two lead units be unavailable for whatever reason.

3.4 The Medium Combustion Plant Directive (EU 2015/2193) requires that by 1 January 2030 all gas turbines with a net thermal input between 1MW and 50MW must not exceed a Nitrogen Oxide (NOx) emissions limit of 150mg/m³. An Emergency Use derogation (Article 6) permits non-compliant gas turbines to continue operating but with restricted running hours: a maximum of 750hrs in a single year with a rolling average of 500hrs over a five-year period. While Units D and E comply with these requirements Unit A does not. Intervention is therefore required to ensure compliance from 1 January 2030. In November 2023 Ofgem

Consultation Peterborough Compressor Emissions – Re-opener Application

determined that the Final Preferred Option to deliver compliance with the Directive should involve:

- The installation and commissioning of a new gas turbine driven compressor unit on an existing plinth by 2030, the new unit to be of approximately 15MW power output.
- The decommissioning of Unit A subject to reassessment following operational acceptance of the new unit.

3.5 Given the role of Peterborough Compressor Station in meeting 1 in 20 obligations and the predicted running hours for the standby unit, retaining Unit A under the Emergency Use derogation, with restricted running hours, was rejected even though it was the lead option identified in the Cost Benefit Analysis.

Re-opener Application

3.6 In June 2025 National Gas Transmission submitted a Re-opener application seeking funding of £115.922m to deliver the Final Preferred Option. Table 2 below provides a build-up of the funding request (Main Works Contractor Costs as updated December 2025).

Table 2: Peterborough Compressor Emissions Funding Request (Redacted)

£m 2018-19 prices	RIIO-T2 2021- 25	RIIO-T2 2025- 26	RIIO-T3 2026- 27	RIIO-T3 2027- 28	RIIO-T3 2028- 29	RIIO- T3 2029- 30	Total
Main Works Contractor (MWC)							
Original Equipment Manufacturer							
Specialist Contractors							
Direct Company Costs							

Consultation Peterborough Compressor Emissions – Re-opener Application

Indirect Company Costs							
Estimating Uncertainty							
MWC Risk / Contingency							
NGT Risk / Contingency							
Total	10.681	27.025	29.525	26.528	18.818	2.315	124.893
Baseline Allowance							8.971
Funding Request	1.710	27.025	39.525	26.528	18.818	2.315	115.922

- 3.7 At Final Determinations an allowance of £9.650m was provided for Peterborough and Huntingdon. This has been allocated between the two separate compressor stations in the same ratio as actual expenditure during the period 2021-25 (Peterborough 91% and Huntingdon 9%). This is the derivation of the Baseline Allowance figure reported in Table 2 above.
- 3.8 Table 3 below reports the outputs and delivery dates proposed in the Re-opener application. The funding request is only for delivery of the first of these outputs. Funding for the second output (implementation of noise mitigation) will be sought after commissioning of the new unit and once the scope of the necessary mitigations has been established. Decommissioning of Unit A has not been included as an output. The need for Unit A to be decommissioned will be confirmed once the new unit has received operational acceptance.

Table 3: Price Control Deliverables

Output	Delivery Date
Deliver one gas turbine driven compressor unit which has operational acceptance, as evidenced by the achievement of Operational Acceptance Certificate (OAC) by the Delivery Date to	31 December 2029

Consultation Peterborough Compressor Emissions – Re-opener Application

achieve Medium Combustion Plant Directive compliance. The OAC also confirms new compressor capacity and emissions compliance.	
Implementation of noise mitigation measures for new compressor Unit F to address potential planning condition non-compliance. Extent of mitigation measures are to be evidenced by independent noise survey following commissioning of the new compressor unit.	31 March 2031

Contract Award and Delivery Strategy

3.9 The project to design, install and commission a Solar Titan T130 gas turbine compressor and acoustic enclosure at Peterborough Compressor Station will be delivered through two principal contracts:

- A New Engineering Contract (NEC4) Early Contractor Involvement (ECI) Main Works Contract with Murphy Group, hereafter known as the Main Works Contractor, to install and commission the new unit; and
- A fixed price contract with Solar Turbines, the Original Equipment Manufacturer (OEM), to design and deliver the new unit on site for free issue by National Gas Transmission to the Main Works Contractor.

3.10 The NEC4 contract is a suite of construction and engineering contracts designed to promote collaboration and effective project management, enhancing efficiency and clarity in contractual relationships. The NEC4 ECI contract is a two-stage cost reimbursable contract that allows for early contractor involvement in the development of a project. This approach is particularly beneficial for complex construction projects where a dedicated pre-planning phase is crucial. The contract includes a design and planning stage before advancing to the main construction phase, ensuring that the contractor's skills and supply chain are utilised to drive greater efficiencies and reduce risks. The contract also provides a dedicated design and construction planning stage, allowing the contractor to consider the integration of designs to optimise buildability and manage construction risks. The stages include:

- Stage 1A involving a feasibility study to develop the project cost estimate;
- Stage 1B including engineering design and preparatory works; and

Consultation Peterborough Compressor Emissions – Re-opener Application

- Stage 2 involving full scale construction, installation and commissioning of compressor to ensure Maintenance Acceptance, Operational Acceptance and Asset Assurance Certificates are milestones are delivered against agreed program.

3.11 Both contracts were awarded directly to the incumbent contractors delivering the installation of Units D and E at Peterborough Compressor Station. Using an existing framework agreement established in October 2022. This direct award process was compliant with the requirements of the Utility Contract Regulations 2016. This involved submission of a tender proposal followed by a challenge process covering both technical expertise and commercial terms. The division of responsibility between National Gas Transmission and the two contractors was established through several workshops and formalised in a Division of Responsibility Scheme.

Main Works Contract Costs

3.12 A detailed cost estimate methodology was produced by the contractor setting out how the costs to deliver stages 1B and 2 of the project were determined. The final cost estimate set out in Table 4 below was 10% lower than the initial cost estimate following challenge / collaborative review process between National Gas Transmission and the Main Works Contractor. The following topics were included in this process:

- Collaborative Review – Contractor’s Programme;
- Collaborative Review - Staffing Costs;
- Collaborative Review – Risk;
- Collaborative Review - Supply-Chain;
- Challenge – Inflation; and
- Collaborative Review – Design.

3.13 Table 4 below provides a build-up of Main Works Contractor cost:

Table 4: Main Works Contract Costs (Redacted)

£m 2018-19 prices	RIIO-T2 2021- 25	RIIO-T2 2025- 26	RIIO-T3 2026- 27	RIIO-T3 2027- 28	RIIO-T3 2028- 29	RIIO-T3 2029- 30	Total
Detailed Engineering							
Build Contractor							

Consultation Peterborough Compressor Emissions – Re-opener Application

Mobilisation							
Build Civils							
Build Mechanical							
Build Electrical							
Build Rotating							
Build Safety & Control							
Testing & Commissioning							
Total							

Original Equipment Manufacturer Costs

3.14 The Original Equipment Manufacturer contract includes:

- Fully integrated T130 gas turbine compressor set with C65 compressor;
- Acoustic enclosure (sub-contracted);
- Fuel and seal gas skids, fire and gas suppression systems (sub-contracted);
and
- On-site delivery with import duty paid.

3.15 Several additional outputs were added at a later stage including:

- Post project support (3 years) £(Redacted)m;
- Commissioning and ongoing operation spare parts and tools £(Redacted)m;
and
- Extended warranty £(Redacted)m.

3.16 Table 5 below provides a build-up of Original Equipment Manufacturer cost:

Table 5: Original Equipment Manufacturer Costs (Redacted)

£m 2018-19 prices	RIIO-T2 2021-25	RIIO-T2 2025-26	RIIO-T3 2026-27	RIIO-T3 2027-28	RIIO-T3 2028-29	RIIO-T3 2029-30	Total

Consultation Peterborough Compressor Emissions – Re-opener Application

Original Package Additions							
Total							

Specialist Contractor Costs

3.17 Several sub-contractors will be employed directly by National Gas Transmission during the project lifecycle to deliver compliance with relevant quality, safety and environmental obligations. All contracts with a value greater than £0.015m will be awarded by competitive tender using existing frameworks. Where actual costs (24%) are not available costs have been estimated (76%) using current market information gained from market testing.

3.18 Table 6 below provides a build-up of specialist contractor cost.

Table 6: Specialist Contractor Costs (Redacted)

£m 2018-19 prices	RIIO-T2 2021- 25	RIIO-T2 2025- 26	RIIO-T3 2026- 27	RIIO-T3 2027- 28	RIIO-T3 2028- 29	RIIO-T3 2029- 30	Total
Inspections							
Environmental Impact Assessment / Surveys							
Total							

Direct and Indirect Company Costs

3.19 National Gas Transmission is responsible for overseeing project delivery and promoting efficient and effective interface between the Main Works Contractor and Original Equipment Manufacturer to ensure design, construction and commissioning activities are compliant with relevant safety, quality / technical specifications and standards. This involves a dedicated project team of project managers, design coordinators, engineering experts and operations technicians. The cost of these staff has been estimated using various sources of information:

- Main Works Contractor delivery programme;

Consultation Peterborough Compressor Emissions – Re-opener Application

- Assessment of governing specifications and standards and the division of responsibility between the Main Works Contractor and National Gas Transmission as set out in the NEC4 Engineering and Construction Contract;
- Cross comparison with other compressor installation projects;
- Lessons learnt from previous relevant projects; and
- Engagement with relevant disciplines within National Gas Transmission.

3.20 Table 7 below provides a build-up of Direct and Indirect Company costs.

Table 7: Direct and Indirect Company Costs (Redacted)

£m 2018-19 prices	RIO-T2 2021- 25	RIO-T2 2025- 26	RIO-T3 2026- 27	RIO-T3 2027- 28	RIO-T3 2028- 29	RIO-T3 2029- 30	Total
Project Management Technicians							
GT Operations (Standard)							
GT Operations (Overtime)							
Total Direct Costs							
Project Managers / Supervisors (Standard)							
Project Managers / Supervisors (Overtime)							
Engineers (Standard)							
Engineers (Overtime)							

Consultation Peterborough Compressor Emissions – Re-opener Application

Design Co-ordination and Commissioning (Standard)							
Design Co-ordination and Commissioning (Overtime)							
Quantity Surveyors							
Other Project Management Staff							
Other Indirect Company Staff							
NGT Overheads							
Total Indirect Costs							
Total Direct and Indirect Costs							

3.21 It is important to note that:

- Direct company costs are those associated with physically performing work on the network and related equipment; and
- Indirect company costs are restricted to Closely Associated Indirect costs (as defined in RIIO-T2 Final Determinations), which are those project management, engineering, design, commissioning and other relevant costs attributable to the project but not within the scope of Direct Company Costs. Business Support Costs are entirely excluded.

Risk / Contingency Costs

3.22 The risk methodology used to identify, prioritise and quantify Risk / Contingency is documented in Appendix D (National Gas Transmission) and Appendix H (Main

Consultation Peterborough Compressor Emissions – Re-opener Application

Works Contractor). A Monte Carlo simulation has been used to estimate the likely outturn value of each risk identified. A Monte Carlo simulation is a statistical modelling technique that uses random sampling to estimate the probability of different outcomes in processes with inherent uncertainty. The P50 value has been taken for inclusion in the Re-opener application with a 50:50 chance of actual costs being above or below this value.

3.23 These cost estimates do not take account of possible mitigations. This approach is justified until the completion of the detailed engineering phase, at which point a more refined assessment of specific mitigation measures and their associated cost benefits can be undertaken.

3.24 Estimating Uncertainty accounts for potential variation in the base cost forecast due to the natural limitations of available information, scope clarity, and design maturity at the current stage fundamentally different from cost contingency, which is reserved for known events or conditions with associated probabilities.

3.25 Table 8 below provides a build-up of Risk / Contingency cost.

Table 8: Risk / Contingency Costs (Redacted)

£m 2018-19 prices	RIIO-T2 2021- 25	RIIO-T2 2025- 26	RIIO-T3 2026- 27	RIIO-T3 2027- 28	RIIO-T3 2028- 29	RIIO-T3 2029- 30	Total
NGT Risk / Contingency							
Mitigated Pre-Mitigation							
MWC Risk / Contingency							
Estimating Uncertainty							
Total							

4. Our assessment and proposed funding decision

Section summary

In this chapter we offer for consideration our assessment of the evidence set out in the Re-opener application and the reasons for our proposed funding decision.

Questions

Q1. Do respondents agree with our assessment of the evidence presented in the Re-opener application?

Our assessment – Needs Case

4.1 In our RIIO-T2 Final Determinations we accepted the ‘needs case’ for investment at the Peterborough Compressor Station to ensure compliance with the Medium Combustion Plant Directive. This remains our assessment.

Our assessment – Final Preferred Option Confirmation

4.2 The purpose of this assessment is not to revisit the option selection but to confirm that the business case for the Final Preferred Option has not fundamentally changed. In making our assessment we requested that National Gas Transmission update the key pieces of evidence used to determine the Final Preferred Option:

- Cost Benefit Analysis;
- Predicted running hours; and
- Analysis of the impact on National Gas Transmission’s ability to meet its 1 in 20 obligations.

4.3 Below we summarise the key data and analysis from our determination of the Final Preferred Option as set out in our November 2023 decision, before we re-evaluate in the light of updated information.

Determination of Final Preferred Option – November 2023

4.4 Table 9 below reports the output from the Final Option Selection Report, Cost Benefit Analysis under all four Future Energy Scenarios (FES21), for both the:

- Counterfactual Option - retention of the existing Avon driven compressor unit (Unit A) under the Emergency Use derogation; and
- Final Preferred Option – installation of a new Directive compliant gas turbine driven compressor unit (Unit F).

Table 9: Final Option Selection Report – Cost Benefit Analysis

Consultation Peterborough Compressor Emissions – Re-opener Application

NPV £me (2018-19 prices)	Steady Progression	Consumer Transformation	Leading the Way	System Transformation
Counterfactual Option	-182	-78	-139	-85
Final Preferred Option	-217	-112	-160	-121
Difference	35	34	21	36

4.5 The Final Preferred Option delivered compliance at a higher cost because the capital expenditure required to deliver it was higher than the potential reduction in future operating expenditure. However, the Counterfactual Option was rejected as the limit on run hours of Unit A, the backup for the two lead Units D and E, would negatively impact the ability of National Gas Transmission to comply with Standard Condition 16 (Pipe-Line System Security Standards) the 1 in 20 peak day demand obligation.

4.6 Table 10 below reports the run hours for the backup Unit A from the Final Option Selection Report under the Counterfactual Option. In the Steady Progression FES21 scenario, Unit A run hours at average winter demand would be circa 80% of the permitted 500 hours for the entire assessment period. As these running hours are based on a probabilistic allocation over the entire assessment period, it is to be expected that actual run hours in any particular year may vary from zero to well above 500 hours. Consequently, there are credible scenarios in which Unit A would not be available to replace either of the two lead units to maintain parallel operation.

4.7 For these reasons we rejected the Counterfactual Option, despite it offering a lower cost of compliance with the Directive.

Table 10: Final Option Selection – Predicted Running Hours (Counterfactual Option)

Unit A Annual Running Hours	Steady Progression	Consumer Transformation	Leading the Way	System Transformation
2030	450	231	133	324
2035	403	48	14	132
2040	457	1	0	63

Consultation Peterborough Compressor Emissions – Re-opener Application

2045	389	0	0	51
2050	372	0	0	37

Updated Analysis

4.8 The Cost Benefit Analysis was repeated using updated capital expenditure and FES24 data. The updated capital expenditure data excludes any expenditure incurred to date that has produced outputs with no residual / recoverable value. These are sunk costs and should not be included when deciding whether to proceed with the Final Preferred Option. The updated analysis indicates that the performance of the Final Preferred Option has declined since the original decision. Table 11 below reports the output from the updated analysis.

Table 11: Updated Cost Benefit Analysis

NPV £me (2018-19 prices)	Counterfactual / Steady Progression	Holistic / Leading the Way
Counterfactual	-122	-314
Final Preferred Option	-189	-340
Difference	67	26

4.9 Table 12 below reports predicted run hours for Unit A using the FES24 data. This analysis indicates that while predicted run hours have declined under the Steady Progression FES24 scenario there remain credible circumstances in which Unit A would not be available for parallel operation.

Table 12: Updated Predicted Run Hours (Unit A)

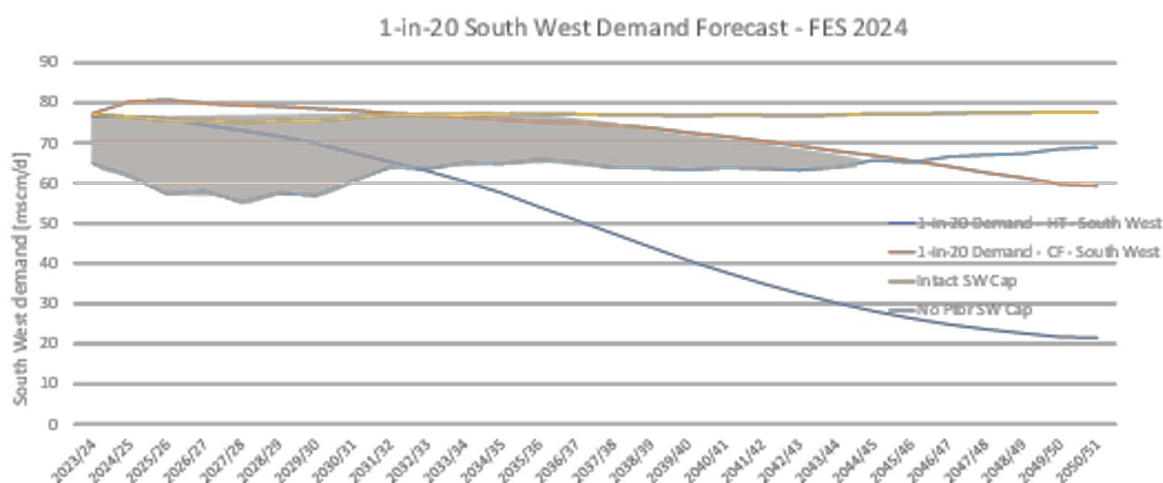
Unit A Annual Running Hours	Counterfactual / Steady Progression (Average Winter)	Counterfactual / Steady Progression (Cold Winter)	Holistic / Leading the Way (Average Winter)	Holistic / Leading the Way (Cold Winter)
2030	309	414	190	280
2035	262	361	81	134
2040	203	295	41	85
2045	192	271	9	25

Consultation Peterborough Compressor Emissions – Re-opener Application

2050	178	260	1	7
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4.10 Figure 1 below indicates that meeting 1 in 20 peak day demand obligations (Standard Condition 16) in the south west will continue to require parallel operation at Peterborough Compressor Station until some point between the early 2030s (Holistic FES24 Scenario) and the mid 2040s (Counterfactual Scenario). For this reason, despite the poorer performance of the Final Preferred Option in the updated Cost Benefit Analysis we continue to reject the Counterfactual Option.

Figure 1: Network Capability and 1-in-20 Demand Forecast (South West)



4.11 Parallel operation is an essential element of network operation once national demand exceeds 300 mscm / day. Table 13 below reports the number of days on which this demand is predicted to occur from forward looking load duration curves.

Table 13: Days National Demand Predicted to Exceed 300 mscm (2030/31)

Counterfactual / Steady Progression	Average Load Duration Curve	Severe Load Duration Curve
2023	41	68
2024	52	78

4.12 In our assessment of the various options presented in the Final Option Selection Report, we rejected options involving the application of Control System Restricted Performance and Dry Low Emissions technologies to Unit A. These technologies would allow Unit A to comply with the Directive but would reduce operating efficiency. Our assessment was that these options would be rejected by the

Consultation Peterborough Compressor Emissions – Re-opener Application

Environment Agency. Subsequent engagement with the Environment Agency has confirmed this assessment.

Our assessment – Alignment with Final Preferred Option

4.13 Our assessment is that the Re-opener application aligns with our decision on the Final Preferred Option for the following reasons:

- Installation of a new gas turbine driven compressor unit of approximately 15MW output power to be commissioned before 1 January 2030;
- The installation to be at an existing plinth; and
- Decommissioning of Unit A to be confirmed following operational acceptance of the new unit.

4.14 It is recognised that the Re-opener application does not include the funding that may be necessary to install the noise mitigation measures. Once the scope and cost of any mitigation measures have been established additional funding can be sought through the RIIO-T3 Network decarbonisation and emissions compliance Re-opener.

Our assessment – Contract Award and Delivery Strategy

4.15 In June 2024 National Gas Transmission sought our agreement in principle to award both the Main Works and Original Equipment Manufacturer contracts to incumbent suppliers delivering the installation of Units D and E at Peterborough Compressor Station. Having considered the evidence presented we agreed in principle to award both contracts to incumbent suppliers. The benefits of this approach were primarily:

- Reduced project costs estimated at between £3m and £5m; and
- Reduction in delivery and programme risk due to the Main Works Contractor already performing works onsite.

4.16 Our assessment remains unchanged. Awarding both contracts to incumbent suppliers was the appropriate approach for this project. In making this assessment we sought further information on realised benefits. National Gas Transmission identified several benefits that had been realised and where possible assigned a monetary value to these:

- Programme acceleration (Main Works Contract) £(Redacted)m;
- Economies of scale (Original Equipment Manufacturer) £(Redacted)m;
- Higher degree of cost accuracy (Stage 1 Main Works Contract);
- Reduction in project risk profile; and
- Compatibility with Units D and E.

Consultation Peterborough Compressor Emissions – Re-opener Application

4.17 These benefits must be set against the loss of competitive tension that results from a direct award approach. However, given the limited number of competitors in the market and the inherent advantage of incumbency our assessment is that competitive tension would have been weak and unlikely to outweigh the benefits of direct award.

4.18 Our assessment is that an appropriate delivery strategy has been adopted with separate contracts for the compressor machinery package and on-site works.

Our assessment – Main Works Contract costs

4.19 Based on our assessment of the evidence presented we do not propose to reduce the level of funding sought. In making this assessment we note that:

- These costs were established through an appropriate contract award process including a robust challenge / collaborative review process;
- A comprehensive and transparent cost estimate methodology has been provided by the Main Works Contractor; and
- The costs have been validated by external advisors (Redacted). This validation indicated that costs aligned with project scope and current market conditions as at Q4 2025.

4.20 In making this assessment we also sought further information on:

- Impact of embargo periods (October to March): National Gas Transmission stated that the programme schedule had been developed in a way that minimised the impact of these periods and that works that would not be impacted would continue during these periods;
- Impact of a six day (50 hour) working week: National Gas Transmission stated that this issue had been the subject of extensive discussion during the challenge / collaborative review process. Ultimately it was concluded that this standard industry practice would reduce programme duration by 20% and result in an overall reduction in project costs. It was recognised that a 50-hour working week would include about ten hours of passing through security, safety measures, and meal breaks;
- Construction of a 131-space on-site car park: National Gas Transmission stated that the project workforce would peak at 126 in September 2026. Failure to provide this facility would mean more time would be lost passing through security to the active site;
- Site security costs: National Gas Transmission stated that these were based on a single security guard being on site 24/7 for the full duration of the works (1274 days);

Consultation Peterborough Compressor Emissions – Re-opener Application

- Allocation of risk between contractor and client: National Gas Transmission provided a full description of risk allocation which aligned with what would be expected under an NEC4 Engineering and Construction, Early Contractor Involvement Design and Build contract;
- Cost estimate methodology assumptions: National Gas Transmission updated these to reflect the final set of assumptions on which the funding request was based;
- Uncertainty around the concrete mix used in the piles under Unit F plinth: National Gas Transmission outlined the actions taken to resolve this uncertainty. The concrete mix may reduce the design life of the piles from the National Gas Transmission internal standard of 120 years;
- Construction of the laydown area: National Gas Transmission stated that the total cost was estimated to be under £(Redacted)m with 30% under tarmacadam;
- Noise: National Gas Transmission stated that the issue arose from the above ground pipework rather than the compressor or acoustic enclosure. While design changes including burial of pipework have been adopted these may not be sufficient in practice to ensure compliance with relevant regulations. Should this be the case National Gas Transmission would seek additional funding through an appropriate mechanism; and
- (Redacted).

4.21 We also compared the Main Works Contractor cost with actual costs from the installation of Solar Titan T130 compressor units at Peterborough and Huntingdon Compressor stations during the Emission Reduction Plan (ERP3). Although the projects and contract scopes are not directly comparable, the comparison indicates a 50% increase in costs per unit installed. This is indicative of a substantial change in market conditions since ERP3.

Our assessment – Original Equipment Manufacturer costs

4.22 Based on our assessment of the evidence presented we do not propose to reduce the level of funding sought. In making this assessment we note that:

- These costs were established through an appropriate contract award process including a robust challenge / collaborative review process; and
- National Gas Transmission undertook a cost comparison with Solar Titan T130 compressor units installed at Peterborough Compressor station during the Emissions Reduction Plan ERP3. This indicated that once scope and design differences were accounted for the cost increase was between 10-15%.

Consultation Peterborough Compressor Emissions – Re-opener Application

4.23 In making our assessment we also carried out a comparison between the ERP3 costs as reported in the Regulatory Reporting Pack (RRP) and this application. This included consideration of the impact of the Sterling US Dollar exchange rate. On 31 October 2014 £1 = \$1.59 whereas on 31 October 2024 £1 = \$1.29. As the price of the Solar Titan T130 is set in US Dollars the devaluation of Sterling over this period means that a machine bought in October 2014 would cost 23.3% more in Sterling terms if purchased in October 2024. Table 14 below summarises our analysis.

Table 14: Analysis of Variation ERP3 and Peterborough Solar TitanT130 (Redacted)

	£m 2018-19 price
ERP3 RRP reported cost (2014 exchange rate)	
Impact of Sterling devaluation	
ERP3 RRP reported cost (2024 exchange rate)	
Difference ERP3 vs OEM (2024 exchange rate)	
Impact of Sterling devaluation	
Difference due to Scope / design and cost changes	
Original Equipment Manufacturer Cost (2024 exchange rate)	

4.24 This analysis suggests that although the Sterling cost of the Solar Titan T130 and Acoustic Cab has increased by 59% (£(Redacted)m) once the impact of Sterling depression against the US Dollar is accounted for the increase is reduced to 28% (£(Redacted)m). It is not possible to accurately determine the split between scope / design driven cost increases and pure cost increases due to data quality. However, based on the evidence available a 50:50 split is not an unreasonable approximation. Our analysis is broadly in line with that presented by National Gas Transmission which presented in US Dollars.

4.25 The majority of any pure cost increase is focused on the Acoustic Cab supplied by (Redacted) has increase by 60% since ERP3 (US Dollar constant prices). This is primarily due to a change in manufacturing location from Bulgaria to the United

Consultation Peterborough Compressor Emissions – Re-opener Application

Kingdom. Unless an alternative supplier could have been identified. This cost increase could not be avoided.

4.26 Scope and design changes since the ERP3 project have driven additional equipment, systems or testing to meet the latest international standards such as ISO 21789 and IEC 61511. These additional requirements have been incorporated into the Solar T130 package purchased by National Gas Transmission. The cost of these extra scope and design requirements could not be disaggregated from the cost information provided by the Original Equipment Manufacturer. Our assessment of the scope and design changes identified by National Gas Transmission are appropriate to meet international standards.

4.27 In making our assessment we also sought confirmation that the contract included sufficient commissioning support from the Original Equipment Manufacturer. National Gas Transmission confirmed that the contract included 106 days of Field Service Representative support which both parties believed was sufficient.

Our assessment – Specialist Contractor costs

4.28 Based on our assessment of the evidence presented we do not propose to reduce the level of funding sought. In making this assessment we note that:

- Cost estimates are a combination of actual costs and forecasts based on market testing; and
- Individual contract costs are in line with actual costs from the Hatton Compressor project.

4.29 In making our assessment, several contracts with outputs that are applicable to all Compressor emissions Re-opener projects have been identified. National Gas Transmission has confirmed that the total cost of these contracts will be allocated to each project such that there is no double counting:

- WBS: 02.03.01 Contractor Project Management (Redacted); and
- WBS: 02.03.06 ((Redacted), (Redacted), (Redacted)).

Our assessment – Direct and Indirect Company costs

4.30 Based on our assessment of the evidence presented we propose:

- Direct Company Costs – Not to reduce the level of funding sought which as a percentage of the Main Works Contract Cost aligns with our decisions on funding applications submitted in January and June 2023 under the Asset Health Re-opener (Special Condition 3.14); and
- Indirect Company Costs – Reduce the level of funding sought by 19% to £(Redacted)m, with the reduction being focused on NGT Overheads.

Consultation Peterborough Compressor Emissions – Re-opener Application

4.31 In making our assessment we also sought further information on:

- Role of graduate trainees: National Transmission confirmed that graduates will deliver defined outputs that are core to project delivery at a much lower cost established employees;
- Benchmarking against previous projects: National Gas Transmission confirmed that the cost estimate was derived from a structured, bottom-up assessment of activities, mapped to clearly defined project stages (design, construction, commissioning and handover). This method ensures traceability from scope to activity to the resources required. Applying historic data from Hatton or ERP3 would introduce significant distortion because these projects were delivered using materially different contractual models;
- Burden of Health & Safety Executive documentation: National Gas Transmission confirmed that process has been refined and optimised across multiple years and projects to ensure safety, clarity and efficient co-ordination;
- Operational acceptance date: National Gas Transmission confirmed that the scheduled date remains unchanged, October 2028, following a period of testing and integration starting in March 2028. The commissioning programme is credible and compliant but remains cautious regarding external risks driven by network prioritisation and the availability of gas;
- Agency staff costs: National Gas Transmission confirmed that cost estimates were based on standard National Gas labour rates irrespective of contract type, so no cost differential has been introduced based on employment status;
- Overtime: National Gas Transmission confirmed that e level of overtime aligns with the likely activity forecast at each stage of the project and the pattern of overtime working included in the Main Works Contract.

Our assessment – Risk / Contingency

4.32 Based on our assessment of the evidence presented we propose an allowance of £10.081m. In making our assessment we conducted a bottom-up analysis of Risk / Contingency Costs:

- Estimating Uncertainty – Excluded given the maturity of the cost estimate at the point of the funding decision;
- MWC Risk / Contingency Pre mitigation – Excluded given the advanced stage of project development at the point of the funding decision;
- MWC Risk / Contingency Mitigated – Accepted £(Redacted)m; and
- NGT Risk / Contingency – Reduced to £ (Redacted)m.

Consultation Peterborough Compressor Emissions – Re-opener Application

4.33 Table 15 below sets out the risks we excluded from the NGT Risk / Contingency element.

Table 15: Quantified Risks Excluded (Redacted)

Quantified Risk	£m 2018-19 prices
Risk addressed through regulatory regime	
Risk will have crystallised or been retired at point of funding decision	
NGT Risk / Contingency	

4.34 In our RIIO-T2 Final Determinations we set our policy that Risk / Contingency should be capped at 10% of project costs (£10.940m). Although project complexity and exogenous delivery risk (network outages on which the project delivery plan depends are under the control of the NTS System Operator rather than the Transmission Owner) may suggest a higher level of Risk / Contingency, this is balanced by project maturity and cost certainty as illustrated by:

- The new Solar Titan T130 and acoustic enclosure will have been delivered to National Gas Transmission subject to a fixed price contract;
- The Main Works Contract will have moved to Stage 2 with contract value finalised;
- Specialist Contractor costs are a combination of actual costs (24%) and forecasts based on market testing (76%);
- Direct and Indirect Company costs are within the control of National Gas Transmission;
- Excluding Risk / Contingency, 35% of project expenditure will already have been incurred.

4.35 We have weighed these considerations and on balance, we believe that an allowance of £(Redacted)m is reasonable.

Our Proposed Funding Decision

4.36 Based on our assessment of the evidence presented in the Re-opener application we propose funding of £99.568m as set out in Table 16 below.

Consultation Peterborough Compressor Emissions – Re-opener Application

Table 16: Peterborough Compressor Emissions funding (Redacted)

£m 2018-19 prices	RIIO-T2 2021- 25	RIIO-T2 2025- 26	RIIO-T3 2026- 27	RIIO-T3 2027- 28	RIIO-T3 2028- 29	RIIO- T3 2029- 30	Total
Main Works Contractor (MWC)							
Original Equipment Manufacturer							
Specialist Contractors							
Direct Company Costs							
Indirect Company Costs							
Risk / Contingency							
Total	10.256	24.166	36.284	23.633	13.221	0.979	108.539
Baseline Allowance							8.971
Proposed Funding Decision	1.285	24.166	36.284	23.633	13.221	0.979	99.568

5. Assessment of RIIO-T2 Price Control Deliverable

Section summary

In this chapter we offer for consideration our assessment of whether National Gas Transmission has fully delivered the relevant RIIO-T2 Price Control Deliverable, and the reasons for our proposed value for the relevant licence term CEPRAt.

Questions

Q2. Do respondents agree with our assessment of the delivery of relevant RIIO-T2 Price Control Deliverables?

RIIO-T2 Price Control Deliverable

- 5.1 At Final Determinations we provided baseline funding to deliver a Peterborough Compressor Station Final Option Selection Report. The parameters of this Price Control Deliverable were set out in Appendix 2 of Special Condition 3.11.
- 5.2 In accordance with Special Condition 3.11.15 in the former licence (as applied by SpC 3.10.8 in the current licence), we have made an assessment as to whether the Price Control Deliverable has been fully delivered and whether we should direct a value for licence term CEPRAt. In making our assessment we will be guided by our [Price Control Deliverable Reporting Requirements and Methodology Document: Version 4](#) (paragraph 7.4).

Our assessment – Delivery of Price Control Deliverables

- 5.3 In making our assessment we have followed the methodology for Evaluative PCDs as set out in our Price Control Deliverable Reporting Requirements and Methodology Document.
- 5.4 Our assessment is that this Price Control Deliverable has been fully delivered and that the value of the licence term CEPRAt should not be modified. In making this assessment we note that in our Peterborough and Huntingdon Compressor Stations – Final Preferred Option consultation we determined that the Final Option Selection Report submitted in January 2023 was valid, complying with all relevant regulatory requirements (in particular, the 33 requirements set out in our Price Control Deliverable Reporting Requirements and Methodology Document (Appendix 5)).

Our proposed CEPRA_t Value

- 5.5 Based on our assessment we do not propose to direct a new value for the CEPRA_t licence term. That currently has the value zero.

6. Proposed Peterborough Compressor Emissions Re-opener Direction

Section summary

In this chapter we set our proposed direction to modify the relevant licence term (CEPO_t) in Special Condition 3.11.

Questions

Q3. Do respondents agree with our proposed draft direction?

Our Proposal

6.1 Based on our assessment of the evidence presented in the Re-opener application under Special Condition 3.11 (Compressor Emissions Re-opener and Price Control Deliverable), submitted by National Gas Transmission in June 2025, we propose to modify by direction:

- The value of the relevant licence term (CEPO_t) in Appendix 1 of Special Condition 3.10 as set out in Table 17 below. This increases the revenue National Gas Transmission may recover through the price control mechanism.
- The outputs, delivery dates and allowances in Appendix 2 of Special Condition 3.10 as set out in Table 18 below. This specifies the parameters of the Price Control Deliverable that National Gas Transmission is required to deliver.

6.2 Although the Re-opener application was submitted under Special Condition 3.11 of the RIIO-T2 licence which no longer generally applies from 1 April 2026, under Special Condition 3.10.8 of the RIIO-T3 licence, the Authority may, in respect of applications validly submitted under Special Condition 3.11, modify Appendices 1 and 2 of Special Condition 3.10.

6.3 As the proposed funding decision set out in Table 16 above covers two price control periods (RIIO-T2 and RIIO-T3) before determining the value of the relevant licence term (CEPO_t) the following adjustments are required:

- A reduction in the value of RIIO-T2 allowances to take account of the Opex Escalator (Special Condition 3.18) which calculates a value for Indirect Company costs by uplifting allowances by 23.11% within the Price Control Financial Model;

Consultation Peterborough Compressor Emissions – Re-opener Application

- An increase in the value RIIO-T3 allowances of 24.54% to convert from 2018-19 into 2023-24 prices; and
- Allowances in the licence are restricted to two decimal places.

Table 17: Proposed Modification by Direction to Licence Term (CEPO_t)

£m	RIIO-T2 2021-25	RIIO-T2 2025-26	RIIO-T3 2026-27	RIIO-T3 2027-28	RIIO-T3 2028-29	RIIO-T3 2029-30
Proposed Funding Decision (2018-19 prices)	1.285	24.166	36.284	23.633	13.221	0.979
CEPO_t Direct Costs only (2018-19 prices)	1.04	19.63				
CEPO_t (2023-24 prices)			45.19	29.43	16.47	1.22

Table 18: Proposed Modification of outputs, delivery dates and allowances

Output	Delivery Date	RIIO-T2 2021-25	RIIO-T2 2025-26	RIIO-T3 2026-27	RIIO-T3 2027-28	RIIO-T3 2028-29	RIIO-T3 2029-30
Installation at Peterborough Compressor Station on Plinth F:	December 2029	1.04	19.63	45.19	29.43	16.47	1.22

Consultation Peterborough Compressor Emissions – Re-opener Application

<ul style="list-style-type: none">• A single 15.3 Mw Solar Titan T130 gas turbine driven compressor unit, acoustic enclosure and hard-wired parallel protection system;• In receipt of an Operational Acceptance Certificate; and• Compliant with the Medium Combustion Plant Directive.							
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6.4 The proposed text of the direction is set out in Appendix 1.

Appendix 1. Proposed Direction

National Gas Transmission plc

Direct Dial: 0207 901 7000

Email: graham.craig@ofgem.gov.uk

Date: [dd Month 2026]

Direction under Special Condition 3.10.8(b) of the gas transporter licence held by National Gas Transmission plc (the Licensee) amending the value of the relevant licence term in Appendix 1 of Special Condition 3.10 and the outputs, delivery dates or allowances in Appendix 2 of Special Condition 3.10.

1. National Gas Transmission plc (the Licensee) is the holder of a gas transporter licence granted or treated as granted under section 7 of the Gas Act 1986.
2. On 30 June 2025 the Licensee submitted a Compressor emissions Re-opener application for Peterborough Compressor Station under Special Condition 3.11.11 (Compressor emissions Re-opener and Price Control Deliverable (CEPt and CEPREt)). Special Condition 3.11 no longer applies, but under paragraph 8 of its successor Special Condition 3.10 (Compressor emissions Price Control Deliverable (CEPt)) the Authority may, in respect of applications validly submitted under Special Condition 3.11, modify the term CEPO_t and the Price Control Deliverables specified in Appendices 1 and 2 of Special Condition 3.10.
3. The Authority hereby issues a direction under Special Condition 3.10.8(b) to:
 - Modify the value of CEPO_t in Appendix 1 of Special Condition 3.10 as specified in paragraph 5 of this direction; and
 - Modify the outputs, delivery dates and allowances in Appendix 2 of Special Condition 3.10 as specified in paragraph 6 of this direction.
4. Further details of the reasons for and effect of this direction and the modifications listed in paragraph 4 can be found in our decision document published alongside this direction on [dd Month 2026]. This decision constitutes notice of our reasons for the purposes of section 38A of the Gas Act 1986.
5. This direction increases the value of CEPO_t and amends Appendix 1 of Special Condition 3.10 as follows:

Compressor emissions baseline Re-opener allowances (CEPO_t) by Regulatory Year (£m)

Consultation Peterborough Compressor Emissions – Re-opener Application

<u>2024/25</u> (<u>2018/19</u> <u>prices</u>)	2025/26 (2018/19 prices)	2026/27	2027/28	2028/29	2029/30	<u>2030/31</u>
<u>N/A</u> <u>1.04</u>	<u>N/A</u> <u>19.63</u>	<u>N/A</u> <u>45.19</u>	<u>N/A</u> <u>29.43</u>	<u>N/A</u> <u>16.47</u>	<u>N/A</u> <u>1.22</u>	<u>N/A</u>

a. Further, this direction amends Appendix 2 of Special Condition 3.10 as follows:

Compressor emissions Price Control Deliverable by Regulatory Year (£m)

Output	Delivery Date	<u>2024/25</u> (<u>2018/19</u> <u>prices</u>)	2025/26 (2018/19 prices)	2026/27	2027/28	2028/29	2029/30	<u>2030/31</u>
<u>Installation at Peterborough Compressor Station on Plinth E:</u>	<u>December 2029</u>	<u>N/A</u> <u>1.04</u>	<u>N/A</u> <u>19.63</u>	<u>N/A</u> <u>45.19</u>	<u>N/A</u> <u>29.43</u>	<u>N/A</u> <u>16.47</u>	<u>N/A</u> <u>1.22</u>	<u>N/A</u>

Consultation Peterborough Compressor Emissions – Re-opener Application

<ul style="list-style-type: none">• <u>A</u> <u>single</u> <u>15.3</u> <u>Mw</u> <u>Solar</u> <u>Titan</u> <u>T130</u> <u>gas</u> <u>turbin</u> <u>e</u> <u>driven</u> <u>comp</u> <u>ressor</u> <u>unit,</u> <u>acous</u> <u>tic</u> <u>enclo</u> <u>sure</u> <u>and</u> <u>hard-</u> <u>wired</u> <u>parall</u> <u>el</u> <u>prote</u> <u>ction</u> <u>system;</u>• <u>In</u> <u>recep</u> <u>t of an</u> <u>Opera</u> <u>tional</u> <u>Accep</u> <u>tance</u> <u>Certifi</u> <u>cate;</u> <u>and</u>								
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Consultation Peterborough Compressor Emissions – Re-opener Application

<ul style="list-style-type: none">• <u>Comp</u> <u>liant</u> <u>with</u> <u>the</u> <u>Mediu</u> <u>m</u> <u>Comb</u> <u>ustion</u> <u>Plant</u> <u>Direct</u> <u>ive.</u>								
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6. This direction will take effect immediately.
7. If you have any questions in relation to this direction, please contact graham.craig@ofgem.gov.uk.

Nathan Macwhinnie

Duly authorised on behalf of the Gas and Electricity Markets Authority

Appendix 2. Privacy policy

Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, “Ofgem”). The Data Protection Officer can be contacted at dpo@ofgem.gov.uk

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

Information: Include here all organisations outside Ofgem who will be given all or some of the data. There is no need to include organisations that will only receive anonymised data. If different organisations see different set of data then make this clear. Be as specific as possible.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for (be as clear as possible but allow room for changes to programmes or policy. It is acceptable to give a relative time e.g. ‘six months after the project is closed’)

6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data

Consultation Peterborough Compressor Emissions – Re-opener Application

- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3rd parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.

7. Your personal data will not be sent overseas (Note that this cannot be claimed if using Survey Monkey for the consultation as their servers are in the US. In that case use “the Data you provide directly will be stored by Survey Monkey on their servers in the United States. We have taken all necessary precautions to ensure that your rights in term of data protection will not be compromised by this”.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system. (If using a third party system such as Survey Monkey to gather the data, you will need to state clearly at which point the data will be moved from there to our internal systems.)

10. More information For more information on how Ofgem processes your data, click on the link to our “[ofgem privacy promise](#)”.