

**To:**

**Gas shipper licensees using LNG terminals**

Email: [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk)

Date: 7 May 2026

**Dear Licensee,**

**Notice requiring the production of specified information under section 34A of the Gas Act 1986 ("the Gas Act") in relation to gas shipper licensee using LNG terminals.**

This letter accompanies a formal Notice under section 34A of the Gas Act requiring the Licensee(s) to which this RFI relates to produce the information specified in the Notice. Please note that this information must be sent to [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk) no later than **14:00 hrs, 2 July 2026**.

The Notice attached to this letter is served in exercise of the Authority's<sup>1</sup> power to request information from regulated persons in relation to specified activities. The Notice sets out the relevant sections of the relevant legislation in detail.

We consider that we reasonably require the information requested in the attached Notice and that this information is necessary for the performance of our statutory functions. As Great Britain's independent energy regulator, Ofgem's principal objective is to protect the interests of existing and future gas and electricity consumers, including their interests in the security of supply of gas and in the fulfilment by the Authority of its designated regulatory functions.

We require the particular information requested within the Notice to inform a more fully-evidenced impact assessment, which will in turn seek to understand and assess the effects of modification 0903 to the Uniform Network Code ("UNC 0903")<sup>2</sup>.

*Background*

National Gas Transmission ("NGT") recovers its Allowed Revenue<sup>3</sup> from charges levied on users of the National Transmission System ("NTS"). The unit rates for these charges are set according to the methodology in section Y of the Transportation Principal Document of the UNC. As per the terms of this methodology, NGT recovers 50% of its Allowed Revenue from charges levied at NTS entry points and 50% from charges levied at exit points. These charges are levied as capacity charges and as such the forecasted aggregate quantities of entry and exit capacity bookings are used to determine a unit charge rate for entry and exit capacity. Lower aggregate quantities of entry capacity are procured in comparison to exit capacity which results in a higher and more volatile charge rate for entry capacity when compared with the charge rate for exit capacity. According to NGT, this is primarily a result of the gas security standard and domestic customer supply security

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<sup>1</sup> The terms "the Authority", "Ofgem", "our" and "we" are used interchangeably in this document. Ofgem is the Office of the Gas and Electricity Markets Authority

<sup>2</sup> [Joint Office of Gas Transporters, 0903 – The introduction of a Single NTS Capacity Reference Price](#)

<sup>3</sup> Allowed Revenue being the maximum revenue it can earn for transporting gas, determined by Ofgem's price control regime.

standards required by the Transporter licence<sup>4</sup> which result in GDNs booking a much larger volume of exit capacity than entry capacity.

UNC0903 aims to address this apparent disparity between NTS entry and exit capacity charges by changing the tariff setting methodology so that a single NTS capacity reference price is applicable to all entry points and all exit points on the NTS (except those where existing discounts are applicable). In practical terms this would mean that the entry and exit capacity reserve prices applicable at all points (except those where existing discounts are already available) would be the same. According to NGT, this change would result in a greater proportion of its Allowed Revenue being collected through exit charges and a smaller proportion being collected through entry charges.

NGT considers that UNC0903 will, in broad terms, improve the current regime by enhancing stability and predictability of charge rates and decreasing the cost and risks associated with use of the NTS which may in turn improve GB's attractiveness for the trade and transport of gas.

The modification was raised by the proposer, NGT, on 6 December 2024 and presented to the Joint Office Panel on the 19 December 2024. It proceeded to consideration by the Joint Office Workgroup who delivered their report to the Panel on the 17 July 2025. Consultation on the Draft Modification Report ran from 18 July 2025 to 2 October 2025 with the Joint Office ultimately receiving 27 responses. The Final Modification Report ("FMR") was issued on 7 October 2025 and presented to the Panel on 16 October 2025. The complexities and wide-ranging impacts of UNC0903 have meant it has been necessary for us to gather a higher standard of evidence than would typically be the case for a modification decision. Since the FMR was issued, we have undertaken a thorough review of available data and invested time in developing this Request for Information in collaboration with stakeholders.

For the reasons set out in the FMR, the Panel recommended that UNC0903 not be implemented. In reaching that decision, Panel members highlighted that the modification would have effects across both the gas and electricity markets. At Workgroup, some participants highlighted potential benefits to electricity customers but agreed that analysis of the effects on the electricity market would fall outside the remit of a UNC Workgroup. The Panel went on to note that while the Workgroup had considered some detailed analysis, there were a number of significant assumptions made (some of which were disputed) that require further scrutiny. The Panel deemed a Regulatory Impact Assessment (RIA) necessary.

### *Purpose of the RFI*

As UNC0903 was deemed a material change to the UNC and was not subject to self-governance procedures, an Authority decision on whether the modification should be implemented is required. The information requested within the Notice will assist us in our work to understand the effects of UNC0903 and allow us to come to a robust decision on its implementation.

The specific purpose of this RFI is to obtain data across a defined time range from gas shippers using LNG terminals to understand:

- i) the costs incurred in shipping LNG to Great Britain; and
- ii) and any non-cost related drivers which may affect your shipping operations to GB

to determine the level of impact the tariff change is likely to have on the GB gas market.

It is our intention that once in receipt of the data and information requested as part of this RFI, we

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<sup>4</sup> Defined in Standard Special Licence Condition A9(2) and A11(1A) of the GDN Transporter Licence which require GDNs to develop systems and have transportation arrangements in place that are sufficient to meet the peak aggregate daily demand, only likely to be exceeded in 1 out of 20 years.

will use it to inform our impact assessment to assess how changes in NTS entry tariffs under UNC0903 affect the cost of supplying gas to GB market via LNG terminals, and whether such tariff changes are likely to be effective in influencing LNG supply to the GB market.

Guidance and background information on how to answer the questions can be found in the RFI Excel file sent alongside the Notice.

Please note that we will also be seeking, on a voluntary basis, information and data in addition to that which is included in this Notice, to further assess the impacts of UNC0903 and inform our impact assessment. These voluntary information requests will be circulated to Licensees in due course.

#### *Confidentiality, disclosure and publication*

Any information provided to us which relates to the affairs of an individual or a particular business will be subject to statutory restrictions on disclosure under section 105 of the Utilities Act 2000. However, you should note that there are exceptions to the statutory restrictions, including where the disclosure is necessary to facilitate the statutory functions of Ofgem (e.g., publishing information to promote the interests of consumers) or other public bodies.

You should note that we cannot provide any assurances in relation to the treatment of information which may be the subject of a request made under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004. However, we can confirm that we will always consider whether the statutory restrictions on disclosure apply to the requested information and therefore whether one or more of the exemptions or exclusions under the relevant legislation apply.

We assume that the information you provide to us is commercially sensitive and we will treat it as such. We advise that you password protect your response and send your response and the password to us in two separate emails.

Before deciding whether to publish any information relating to the affairs of a particular licence holder or business, Ofgem is required to consider whether it is appropriate to redact any information on the basis that the information would or might, in our opinion, seriously and prejudicially harm the interest of that person ("Confidential Information"). To help us conduct this assessment (if we are considering publishing information) please indicate in your response whether you consider any information to be Confidential Information and provide brief reasons why this is the case. Where appropriate, we may seek further representations from relevant persons at a later stage in respect of any specific information Ofgem is proposing to publish.

#### *Your response*

The information specified in the relevant Notice and the RFI Excel file (UNC0903 - Gas Shipper - LNG - Question Set.xlsx) must be sent to [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk) by no later than **14:00 hrs, 2 July 2026**. This information must be provided in an appropriate electronic form using the template provided.

For those licensees receiving the Notice in hard copy, please access the RFI Excel file (UNC0903 - Gas Shipper - LNG - Question Set.xlsx) using the following link and return to [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk) by the deadline set out above:

<https://www.ofgem.gov.uk/call-for-input/introduction-single-national-transport-system-capacity-reference-price-unc903-request-information>

**Should the questions within this RFI notice be irrelevant to your gas shipping operations, please provide a nil return to [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk) by the deadline above. Please make clear in your response the Licence to which the nil return relates.**

If you have any questions concerning this Notice, please contact [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk).

**Dr Adrian Richardson  
Deputy Director for Energy Markets & Security  
Duly authorised on behalf of the Gas and Electricity Markets Authority**

## NOTICE

### Request for information pursuant to section 34A of the Gas Act 1986

#### Whereas:

1. The Licensee ("the licensee") is the holder of a gas shipper licence granted or treated as granted under section 7A of the Gas Act 1986 (the "Act") for gas shippers and therefore regulated persons for the purposes of the Act.
2. In accordance with section 34A(1) of the Act, the Gas and Electricity Markets Authority ("the Authority") in performing its duty under section 34 of the Act in relation to activities falling within section 34(2A) requests information:
  - a) to keep under review the carrying on both within and outside Great Britain of activities specified in section 5(1) of the Act concerning the arrangement for gas to be introduced into, conveyed by means of or taken out of a pipeline system operated by that transporter and in relation to the following matter specified in Article 41(1)(j) of the Gas Directive<sup>5</sup> as it had effect immediately before IP completion day:<sup>6</sup>

*"monitoring the **level and effectiveness of market opening and competition at wholesale and retail levels**, including on natural gas exchanges, **prices for household customers** including prepayment systems, switching rates, disconnection rates, charges for and the execution of maintenance services and complaints by household customers, as well as any distortion or **restriction of competition**, including providing any relevant information, and bringing any relevant cases to the relevant competition authorities;"<sup>7</sup>*

#### Questions:

For all of the questions below, please refer to time period between October '24 & September '25, i.e. the Gas Year '25, with gas winter covering 1<sup>st</sup> October '24 to 31<sup>st</sup> March '25 and gas summer covering 1<sup>st</sup> April '25 to 31<sup>st</sup> September '25.

Please provide in detail the following information.

*Reasoning: - To understand the breakdown of the landing costs to ship LNG to GB (including fixed costs), to determine the level of impact the tariff change is likely to have on the GB gas market.*

1. For the GB market on the terminals that are berthed at, please provide the following:

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<sup>5</sup> Directive 2009/73/EC of the European Parliament and of the Council of 13 July 2009 concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC.

<sup>6</sup> Section 39 of the European Union (Withdrawal Agreement) Act 2020 defines "IP completion day" means 31 December 2020 at 11.00 p.m

<sup>7</sup> Article 41(1)(j)

A breakdown of the following costs for the gas year 2025. Please state the units/ currency and the indexed year (i.e. price base year) in supplying the figures.

- i. Average daily charter rate
- ii. Landing costs
  - a) Regasification cost
  - b) Nitrogen ballasting costs
  - c) Entry tariff cost
  - d) Other landing costs
  - e) What are your total landing costs?
- iii. Boil-off costs
- iv. Other costs (including insurance)

*Reasoning: - To understand seasonal differences in the breakdown of costs to ship LNG to GB*

2. In the costs provided for question 1, were there any seasonal differences between gas summer and gas winter?
  - i. If so, what were the causes of the difference in average costs between the two seasons? Please elaborate.

*Reasoning: - To understand if there are economies of scale, i.e. higher volumes lead to cost discounts.*

3. For the previous year, did bookings with higher volumes or a greater number of LNG cargoes benefit from higher discounts or cost savings? If so, please provide details on the discounts.

*Reasoning: Shippers on pre-existing long-term contracts are on entry tariffs which are lower than the current entry tariffs, which may mean that even in a post-UNC0903 world where entry tariffs are lower than they are currently, they may still be higher for those on the pre-existing contracts.*

4. Are you on a pre-existing contract (with one or multiple LNG terminals)?
  - i. What are the tariff rates on these contracts?
  - ii. When does it/do they expire?

*Reasoning: To understand what the differences are between shipping to one GB terminal over another (if you ship to more than one LNG terminal in the UK).*

5. Which LNG liquefaction plants are you importing from? Please specify the country in which each liquefaction plant is located.
6. Please provide the transit time from the liquefaction plants you have listed in your answer to question 5 and cost of shipping (per nautical mile) for delivering to Milford Haven and Isle of Grain (assuming no delays due to anchorage)?
7. Are there any other differences in terms of costs for landing at different terminals (e.g. does regasification cost more at Dragon vs South Hook vs Isle of Grain)? If yes, please specify.

8. In the previous gas years, what other factors were considered when deciding where to ship to (among the various GB terminals) beyond NBP price and transport costs?

*Reasoning : Does the entry tariff affect the risk premia attached to your contract and are you able to explain how?*

9. For both the previous gas summer and gas winter:
- i. What percentage risk premia were included in contracts?
  - ii. Did any factors influence the risk premia? If yes, please explain.

**Now therefore:**

3. Pursuant to section 34A(2) of the Gas Act, the Authority hereby requires the licensee to provide to the Authority all the information which is specified or described in the relevant RFI attachment (UNC0903 - Gas Shipper - LNG - Question Set.xlsx) sent with this Notice.
4. The information specified or described in the RFI Excel file (RFI Shippers UNC0903 - gas shippers using LNG terminals.xlsx) sent with this Notice and available online at: <https://www.ofgem.gov.uk/call-for-input/introduction-single-national-transport-system-capacity-reference-price-unc903-request-information>, must be delivered to Ofgem at [Gas.Systems@ofgem.gov.uk](mailto:Gas.Systems@ofgem.gov.uk) no later than 14:00 hrs., 2 July 2026.

Signed

**Dr Adrian Richardson**  
**Deputy Director for Energy Markets & Security**  
**Duly authorised on behalf of the Gas and Electricity Markets Authority**

Dated: 7 May 2026

Failure to comply with the terms of this Notice may constitute a breach of a relevant requirement and may therefore lead to enforcement action being taken by the Authority pursuant to section 28 of the GA86.

The alteration, suppression or destruction of documents or records requested in this Notice may lead to criminal action under section 34A(5) of the Act. The provision of false information may also lead to criminal action under section 43 of the Act.

