

Uniform Network Code (UNC) 0907: Extension to current maintenance period (UNC0907).

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| Decision: | The Authority ¹ has decided to reject this modification ² |
| Target audience: | UNC Panel, Parties to the UNC and other interested parties |
| Date of publication: | 24 June 2026 |

Background

Under the Uniform Network Code ('UNC'), the Planned Maintenance Period is defined as the months of April to October (inclusive) in any year, in relation to the National Transmission System ('NTS').³ National Gas Transmission ('NGT') provides a Maintenance Programme for maintenance to be carried out during this period. In accordance with the UNC, NGT plan for the timing of the NTS maintenance to align with the maintenance schedules of connected customers where possible, to minimise the disruption of gas supply⁴ NGT reserves the right to call Maintenance,⁵ which are imposed on consumers and do not have to be agreed in advance during the maintenance period. However, they have a financial incentive to limit the use of Maintenance Days and align maintenance with customers' schedules through Advice Notice Days, which are not forced and are agreed with relevant customers in advance.

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 See UNC TPD Section L Maintenance and Operational Planning

⁴ See UNC TPD Section L – 3.5 NTS Maintenance Planning

⁵ See NGT Special Licence Condition Part E: Maintenance and operational planning.

The modification proposal

On 20 February 2026, NGT ('The Proposer') raised UNC modification 0907: 'Extension to the current maintenance period'. The modification proposes to amend the current maintenance period, extending it from 1 April – 31 October to 1 March – 30 November.

The Proposer states that they expect a 40% increase in the required asset health work on the NTS during the third gas transmission price control ('RIIO-GT3'). This would result in an increase in outage-dependent maintenance on the NTS, which is required for the Proposer to meet its legal requirements regarding safety and to ensure the security of supply of gas. The Proposer states that the current length of the maintenance period is no longer sufficient given the future operational demand, and that without the proposed extension there is a risk of congestion within the current maintenance window (1 April – 31 October), which could lead to scheduling inefficiencies, increased disruption and potential delays to critical health work. The Proposer states that extending the maintenance period would enable better planning, reduce operational risk and support long-term system resilience, ultimately benefiting consumers through improved safety, reliability and service quality. The proposal is intended to mitigate the risk of disruption to customers by aligning maintenance schedules and limiting activities to low risk and low impact maintenance works during the months of March and November where possible.

The Proposer believes this modification proposal would better facilitate UNC Relevant Objective ('RO') (a), stating that by extending the maintenance period they can better distribute planned works across the year, reducing scheduling bottlenecks and enabling more efficient use of resources. The Proposer also believes that maintenance during the proposed Planned Maintenance Period will allow the NTS to be maintained in accordance with required safety regulations, ensuring RO (a) is impacted positively. The Proposer notes that the modification could be beneficial to gas security of supply, because it ensures all necessary maintenance can take place in a timely manner.

UNC Panel⁶ recommendation

At the UNC Panel meeting on 19 February 2026, a majority of the UNC Panel considered that UNC0907 would not better facilitate the UNC Relevant Objectives, with 9 out of 14 Panel Members voting against the implementation of this modification proposal. The Panel considered RO (a) as well as (c) during the discussion.

Our decision

We have considered the issues raised by the modification proposal and the Final Modification Report ('FMR') dated 20 February 2026. We have considered and taken account of the responses to the industry consultation on the modification proposal which are attached to the FMR.⁷ We have concluded that:

- implementation of the modification proposal will,⁸ and
- directing that the modification be made would not be consistent with our principal objective and statutory duties.⁹

Reasons for our decision

We consider this modification proposal will not better facilitate UNC objective (a) and has a neutral impact on UNC objective (c).

The UNC Panel invited interested parties to respond to a UNC0907 consultation on 21 November 2025. Of the 6 representations received, 2 supported the implementation, 1 offered qualified support and 3 were not in support.

⁶ The UNC Panel is established and constituted from time to time pursuant to and in accordance with the UNC Modification Rules.

⁷ UNC modification proposals, modification reports and representations can be viewed on the Joint Office of Gas Transporters website at [Joint Office of Gas Transporters](#)

⁸ As set out in Standard Special Condition A11(1) of the Gas Transporters Licence, see: [Licences and licence conditions | Ofgem](#)

⁹ 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.

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

The Proposer, some Panel members and some consultation respondents believe that the proposal would better facilitate RO (a). They argue that by extending the maintenance period NGT can better distribute planned works across the year, reducing scheduling bottlenecks and enabling more efficient use of resources. As such the proposal would facilitate the completion of necessary maintenance work in accordance with required safety regulations.

The Proposer states that the modification would have a low impact on NTS Directly Connected Customers. Where possible, they would endeavour to co-ordinate mutually agreed dates with customers to avoid disruption. Further, they will only carry out low risk maintenance works that already take place outside the current window. The Proposer notes that the proposal's primary purpose is to introduce flexibility in scheduling and to formalise existing activities that already occur in practice.

Some Panel Members, Workgroup participants and consultation respondents believe the proposal would have an indirect negative impact on RO (a). They believe that the proposal could have a significant detrimental impact on NTS Directly Connected Customers, specifically gas-fired power generators and industrial gas users. Therefore, they argue that the proposal fails to take a "whole energy system" approach.

Some Workgroup Participants noted that the current arrangements facilitate maintenance works during the shoulder months (March and November) while ensuring the maintenance is held at times mutually convenient for both the Gas System Operator and the Directly Connected Customers. Therefore, it would not be appropriate to use a counterfactual that

maintenance works cannot be completed in these shoulder months without an extension to the maintenance period.

Some Workgroup participants believe the proposal does not provide adequate evidence of adverse network conditions which require the extension of the maintenance period into March and November. Some Workgroup participants and consultation respondents also believe that there has been inadequate consideration of alternative approaches to improving the efficient delivery of maintenance works. This proposal may also reduce the incentive to pursue innovative and less disruptive methods of delivering maintenance.

We consider that the proposal would have a negative impact on RO (a).

We agree that the current arrangements allow for maintenance to be carried out during the proposed shoulder months and consider that there has not been sufficient evidence provided to justify the extension of the maintenance period in order to complete necessary works. Further, we consider that extending the maintenance period by two months may lessen the incentive for NGT to innovate and improve the efficient delivery of maintenance works. As such, we encourage NGT to explore alternative methods to maximise the efficient and economic delivery of maintenance works.

(c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence

Some Panel Members considered that the proposal would have a positive impact on RO (c). They believe the proposal would better equip NGT to meet its obligations under its Gas Transporter Licence, specifically Standard Special Condition A9 'Pipe-line System Security Standards', by giving NGT a wider enforceable and incentivised time period over which to complete its anticipated 40% increase in network integrity activities. Such activities ensure

that the NTS remains capable of meeting the security standards and maintaining resilient supplies to both gas and electricity consumers.

Some Panel Members, Workgroup Participants and consultation respondents raised concerns that under this proposal customers did not have the absolute ability to cancel or opt out of the forced maintenance works during the shoulder months. They believe that the proposal could have a significant detrimental impact on NTS Directly Connected Customers, specifically gas-fired power generators and industrial gas users.

We consider that the proposal would have a neutral impact on RO (c).

We agree that maintenance works are critical for the ensuring the resilient supply of gas to consumers, specifically in pursuance of Standard Special Condition A9 'Pipe-line System Security Standards'. However, we also note the concerns that this proposal may increase the risk of disruption of gas supplies to Directly Connected Customers. While the extension of the Maintenance period would provide NGT the right to call enforced Maintenance Days within the months of March and November, it would potentially cause disruption in gas supply to customers. The current arrangements also already allow for the maintenance works to be held within the shoulder months, providing they are carried out at mutually agreed times between the interested parties. Additionally, the Maintenance Incentive scheme encourages the limitation of Maintenance days in favour of mutually agreed Advice Notice Days with customers.

On balance, while we recognise that increased opportunity to carry out maintenance could represent an increased ability to meet the licensee's obligations regarding pipeline maintenance, we have not been presented with sufficient evidence to suggest that these standards will not be met under the current maintenance arrangements.

Our principal objectives 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. Those interests include the reduction of gas-supply emissions of targeted greenhouse gases and associated costs.

Consumer Interest

The Proposer argues that the modification would have no impact on domestic consumers and very limited impact on Directly Connected Customers. Some Workgroup members explicitly disagreed with this assessment, stating that gas-fired power stations may be particularly impacted by an extension of the maintenance period, arguing that the imposition of Maintenance Days could affect their ability to meet electricity market obligations.

We recognise the above argument and share the concern around the impact that extending the maintenance period would have on some Directly Connected Customers. While there was limited evidence presented regarding this risk, we agree that in principle there could be a negative impact on these users if the Maintenance Period was to be extended.

Security of supply

The Proposer states that the proposal would provide benefit to security of supply through reduced risk of supply interruptions caused by malfunctioning equipment. The Workgroup participants and consultation respondents argued that the security of supply benefits to gas consumers would be limited, while the impacts on electricity users could be significant. If Maintenance Days are imposed on power generators, they may be unable to effectively respond to demands on the electricity system, impacting availability and reducing overall system security.

On balance, we see little evidence to suggest that gas system users will benefit from the increased maintenance period. As noted above, there was insufficient demonstration by the Proposer to suggest that outages would increase under the existing arrangements. Additionally, while the impact on the security of the electricity supply is unclear, we do in principle recognise that imposing Maintenance Days on Generators may represent a risk to their ability to meet their electricity capacity market obligations. Therefore, we consider this proposal could have a negative impact on overall system security.

Decision notice

In accordance with Standard Special Condition A11 of the Gas Transporters Licence, the Authority has decided that modification proposal UNC 0907: 'Extension to the current maintenance period' should not be made.

William Duff

Head of Gas Systems and Operations

Signed on behalf of the Authority and authorised for that purpose