

To: RIIO3@ofgem.gov.uk

20 July 2026

National Gas Transmission's response to the Modifications to the Biomethane Connections UIOLI governance document consultation

Dear Sir/Madam,

Thank you for the opportunity to respond to the above consultation.

The changes proposed introduce flexibility across Gas Distribution Networks. However, these changes do not provide the flexibility across all Gas Networks to facilitate and promote competition for biomethane connections.

We consider a more desirable outcome for biomethane connection customers would be national funding via a combined revenue pot that all gas networks would have access to, subject to appropriate governance arrangements.

National Gas is keen to explore and share views on the way in which this could work, mechanistically and through the funding models and, in due course, discussions on potential Licence and governance document changes.

We believe further changes beyond those proposed would better facilitate biomethane connections across all networks and the UK, providing the greatest level of flexibility for biomethane parties to ultimately benefit consumers.

We note that this consultation is not intending to cover wider changes to the governance document and there will be the opportunity in August 2026 to comment on the Gas Transporter Licence and on associated documents (e.g. we assume this will include the governance document) in the Autumn of 2026.

Further consideration should be given to the accessibility and governance of a combined funding arrangement ahead of introducing changes to the governance document, and there is opportunity for this later this year.



If you would like to discuss any part of this response, or to discuss further thinking in this area please do not hesitate to contact me (dave.nanda@nationalgas.com).

Yours faithfully,

Dave Nanda
Head of Future Frameworks

