Northern Gas Networks

Smell gas?
Call the National Gas Emergency Service
on 0800 111 999

Tom Lewis
Ofgem -Energy Code Governance Reform Team
10, South Colonnade, Canary Wharf
London,
E14 4PU
Email: RIIO3@ofgem.gov.uk

4th September 2026

Dear Tom,

Modifications to Special Condition 3.21 of the Gas Transporter Licence – Biomethane Distributed Entry Reinforcement use it or lose it allowance ($BDER_t$)

Thank you for the opportunity to provide representations on the above statutory consultation relating to Special Condition 3.21 of the Gas Transporter Licence and the Biomethane Distributed Entry Reinforcement use it or lose it allowance (BDERt).

Northern Gas Networks has reviewed the proposed licence modifications and supports the changes. We agree that allowing the BDER UIOLI allowance to be applied at a corporate level for operators with more than one distribution network will provide greater flexibility and support the efficient deployment of the allowance to facilitate biomethane connections where it can deliver the greatest benefit.

We also support the associated consequential amendments to the licence drafting, which give effect to the changes approved through the Biomethane Connections UIOLI Governance Document and ensure the licence condition operates as intended.

I hope these comments are helpful. Should you require any further information in relation to this response, please do not hesitate to contact me.

Yours sincerely,

Tracey Saunders (via email)
Northern Gas Networks Ltd
Head of Market Regulation and Compliance
Mobile: 07580 215743

we are the network

Northern Gas Networks Limited is registered in England and Wales, no. 5167070.
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