Consultation name: Modifications to Special Condition 3.21 of the gas transporter licence - Biomethane Distributed Entry Reinforcement

Issued by: Ofgem

Territorial extent: Great Britain

Response author: SGN

Deadline for responding:07/09/2026

SGN

St Lawrence House

Station Approach

Horley

RH6 9HJ

Donald Lam

Head of Gas Distribution Policy, Network Price Controls Ofgem

Via email to: RIIO3@ofgem.gov.uk

07/09/2026

Modifications to Special Condition 3.21 of the gas transporter licence - Biomethane Distributed Entry Reinforcement

SGN is a world class engineering business that designs, builds, operates and maintains energy systems. Our gas network plays a vital role in ensuring energy security and resilience across the UK by efficiently and safely delivering natural and green gas through our three gas networks to six million homes and businesses across South London, the south of England and Scotland, reliably delivering around 18% of the nation's energy demand met by gas.

Thank you for the opportunity to respond to the above consultation[1] following the changes implemented to the Biomethane connections UIOLI Governance Document through the July 2026 consultation period. SGN have reviewed both the changes to the governance document along side the proposed changes to the associated licence condition 3.21.

It is positive to see the amendment of wording to include the proposed changes to the governance document which allows for licensees that operate over more than one distribution network to reallocate the allowances between its networks where licences are held within the same corporate group, and we acknowledge the changes to 3.21 of the gas transporter licence reflects this change within Appendix 1.

The reference to SGN within appendix 1 however, should be kept consistent with other references to SGN as an entity with multiple networks within the licence document. This should be amended to 'SGN Group' as described in Appendix 1 of SpC 5.2 and SpC 5.3 to reflect the corporate group which is inclusive of both Scotland and Southern Networks.

Yours sincerely,



David Handley

[1] Modification to Special Condition 3.21 of the gas transporter licence | Ofgem