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| Network Innovation Competition 2020 Supplementary Answer form | | |

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| Project Name | H100 Fife | | |
| Question number | #26 | Pro forma section | 7 |
| Question date | 10/09/20 | Answer date | 14/09/20 |
| Question summary | SGN have stated the hydrogen storage will not comprise a storage facility under the Gas Act, therefore unbundling does not need to be further considered. Can you provide further justification of how this conclusion has been reached? | | |

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## Answer (please retain document formatting and do not exceed 2 pages unless otherwise agreed with Ofgem)

Section 48 of the Gas Act states that a 'storage facility' is (in summary): "storage in porous strata, or in cavities in strata, of gas which has been, or will be, conveyed in a pipeline system operated by …" a transporter, or the storage of liquid gas which (if regasified) would be suitable for such conveyance. Since the gas will be stored in gaseous form and in tanks above ground (and not in strata), the rules will not apply.