



Price Control for Northern Ireland's Gas Transmission Networks GT27

Consultation on UR Approach

GNI (UK) Response

Jan 2026

GT27 Approach Consultation Response

GNI (UK) welcomes the opportunity to respond to the GT27 Approach Consultation on the price control for Northern Ireland's gas transmission networks.

The consultation demonstrates solid consideration of GNI (UK)'s priorities outlined in the recent Call for Information on future gas distribution and transmission price controls in Northern Ireland.

Financial Framework Model for North West and South North pipelines

As highlighted in the Call for Information, both GNI (UK) transmission pipelines located in Northern Ireland are approaching the end of their revenue recovery period of 25 years within the next 10 years, with the North West Pipeline ending in 2029 and the South North pipeline in 2031, both of which will be during the GT27 price control period. GNI (UK) highlighted that a review of the overarching approach to the regulatory framework model is necessary as part of the GT27 process to find the most appropriate regulatory framework to apply to a network operator with a limited regulatory asset base to ensure its continued viability into the future.

GNI (UK) welcomes UR's recognition of this as a priority workstream for GT27 and its commitment to engage extensively with GNI (UK) on same. GNI (UK) has initiated the required due diligence in advance of this process.

Energy Transition

Despite the challenges posed by legislative constraints and uncertainty around future decarbonisation policy, GNI(UK) welcomes UR's call for a pragmatic and flexible approach to supporting the energy transition while ensuring the safe and efficient operation of the gas networks. As further policy emerges in Northern Ireland - such as hydrogen blending, hydrogen strategy, security of gas supply - it would be beneficial for UR to maintain this flexible approach to energy transition funding.

Integrated Energy System Planning

UR's approach to integrated energy system planning focuses on collaboration, alignment, and long-term planning to support the energy transition and ensure regulatory decisions are well-informed and effective. GNI(UK) welcomes the continued work here and is committed to expanding on this with UR and other System Operators in GT27.

Security and Resilience

GNI (UK) welcomes UR's commitment to protecting critical infrastructure and communications equipment from emerging cyber and physical security threats. As an Operator of Essential Services, GNI (UK) has made substantial investments in



cybersecurity and works closely with the NIS Competent Authority and the Enforcement team in the Department of Finance NI to ensure regulatory compliance. Achieving this compliance demands ongoing investment in personnel, processes and technology. GNI (UK) is aware of the UK's intention to introduce a Cyber Security and Resilience Bill, which will update NIS Regulations and may extend to include physical security measures. Support for obtaining the Unique Reference Numbers (URN's) for GNI (UK)'s Northern Ireland sites remains crucial for enhancing rapid response capabilities, reinforcing infrastructure resilience, and maintaining adherence to best practice standards that uphold energy security. GNI (UK) will make appropriate provisions for these requirements in its business plan submission.

Price Volatility

Recent geopolitical conflicts and the pandemic have caused extreme price volatility and inflation, impacting energy consumers. While protecting affordability is crucial, the GT27 regulatory framework must remain flexible so network operators can adjust for inflation in their REPEX and OPEX activities. GNI (UK) welcomes UR plans to assess the impact of Real Price Effects (RPEs) and, where analysis indicates any material risk to licence holders, they will consider this as a factor in making adjustments to allowances to account for RPEs.

Consumer and stakeholder voice

GNI (UK) are supportive of UR's approach to stakeholder engagement in the energy transition which is designed to be inclusive, transparent, and focused on achieving the best outcomes for consumers and the environment. Although key decisions on the net-zero transition are pending, GNI (UK) expects little effect on GT27 price controls, as major investments like hydrogen repurposing are unlikely during this period. Supporting early low-risk activities should not significantly impact consumers and will help advance the transition.

Submission

UR has indicated that the Business Plan Reporting Template will be issued w/c 23rd February. GNI (UK) would appreciate receiving this at the earliest opportunity to allow maximum time for business plan preparation.

GNI (UK) looks forward to collaborating with UR in the forthcoming months to prepare a comprehensive Price Control submission for w/c 8th June.