



Utility Regulator Draft Forward Work Programme 2026-2027 Consultation - GNI (UK) Response

19th February 2026

1. Introduction

GNI (UK) welcomes the opportunity to respond to the Utility Regulator's draft Forward Work Programme (FWP) 2026 to 2027. GNI (UK) is one of two gas transmission system operators in Northern Ireland and one of five gas network operators, together with the three gas distribution network operators. We are committed to playing our role in Northern Ireland's energy transition and are collaborating with other network operators and stakeholders to support the contribution that the gas network and renewable gases can make to decarbonisation. The Utility Regulator's publication and consultation approach for the draft FWP provides clear visibility of priorities and a structured route for engagement.

2. Gas Transmission System

We welcome the elements of the FWP that relate to the gas transmission system and the regulatory framework within which it operates. Forward visibility of the programme enables transmission operators to align planning and evidence preparation to upcoming regulatory steps during 2026 to 2027. The use of a published draft plan and defined channels for response supports proportionate and timely stakeholder input as the work programme is finalised.

3. Gas Transmission Price Controls (GT27)

We note that the GT27 process is already under way, including publication of the Utility Regulator's Approach Consultation Paper in November 2025, which set out proposed approaches to the structure and duration of the control, opex and rep-ex assessment, treatment of inflation, energy transition allowances, and the framework for remuneration and risk. This followed an earlier Call for Information in June 2025, which sought views on the strategic challenges and opportunities facing future gas price controls, including transmission. We welcome the continued reference to GT27 within the draft FWP and support the Utility Regulator's ongoing, collaborative approach to the development of the next gas transmission price control. Constructive engagement throughout the process will be important in supporting an evidence-based framework that delivers efficient outcomes for consumers while ensuring the safe and resilient operation of the transmission system.

4. Regulatory Alignment

The draft FWP recognises the need for regulatory alignment across sectors, including electricity and gas, in the context of wider market and system change. This cross-sector perspective is relevant to long-lived transmission assets and to security of supply over the coming years. The Utility Regulator's involvement in broader energy system planning, including SEM-related work, provides helpful context for joined-up decision-making as the GT27 programme develops.

5. Suggested additions to the programme

In addition to the ongoing development of GT27, there are several wider gas-transmission areas that may merit brief inclusion in the final FWP. These align with the Utility Regulator's existing emphasis on resilience, long-term planning and energy system evolution.

6.1 System resilience and contingency planning

A short reference to future work on transmission system resilience could be broadened to include gas security, reflecting the Utility Regulator's role in this area. This could cover strategic contingency considerations for gas transmission infrastructure and the need to ensure continued gas supplies to Northern Ireland, including in the context of emerging policy discussions such as the DESNZ consultation on gas security. This acknowledgment would complement the FWP's broader focus on maintaining essential services.

6.2 Renewable gas readiness

As we transition to renewable gases, it may be helpful to signal further engagement on the technical and operational implications for the transmission system, consistent with ongoing energy transition work.

6.3 Cross sector coordination and regulatory alignment

Given the Utility Regulator's involvement in SEM related electricity planning, an acknowledgment of work to ensure coherence between gas transmission and wider system developments would support long term investment alignment. A reference to the importance of regulatory alignment with Great Britain, where appropriate, could further support efficient planning and policy coherence across interconnected gas markets.

6. Conclusion

GNI (UK) supports the overall direction of the draft FWP 2026 to 2027 and the continued, collaborative



development of GT27. The additional items proposed above are deliberately high-level and would provide helpful visibility for stakeholders while maintaining the concise style of the FWP. We look forward to continued engagement with the Utility Regulator as GT27 progresses.