

# GNI (UK)'s submission on the Utility Regulator's Consultation on Proposed Modifications to Biomethane Licence Modifications to the Gas conveyancing Licences

22 October 2025



GNI (UK) Limited (“**GNI (UK)**”) welcomes the opportunity to respond to this consultation and look forward to further engagement with UR in advance of any final decision being published.

Please see GNI (UK)’s response below.

## **1. GNI (UK)’s response**

GNI (UK) welcomes this consultation and proposed modifications, which are designed to underpin access for gas from renewable energy sources to the Network. We feel that the modifications will support the Northern Ireland Gas Network Operators (GNOs) shared ambition to decarbonise the network and provide transparency to all stakeholders.

We welcome the extension from 28 day to 6 months for connection and quotation requests for connection to a Pipe-Line System, Storage Facility or LNG Facility respectively, as set out in condition 2.3.5. These connections are complex and have long lead-times requiring for provision of a specific statement of connection charges, and other terms of connection, for connections to the high-pressure network.

Similarly, we support the approach to Gas Delivery Facility connections set out in condition 2.3.13 and the need to offer terms in an as soon as reasonably practicable, as the site-specific nature of Gas Delivery Facility connections impacts finalising the terms.

In relation to requirements set out in condition 2.3.17, we believe there will need to be a joint approach by the NI GNOs to developing Calorific Valve Management Statements as the number of GDF connections grow and the volume of gas increases over time.

We do note the ongoing work by DfE (Department for the Economy) with respect to biomethane policy development and are conscious that when finalised, it may impact gas our conveyance licence and further changes may be required.

We would welcome the opportunity to discuss any aspect of our response.