

Veronika Gallagher
Utility Regulator
Millennium House
Great Victoria Street
Belfast, BT2 7AQ

Gas Market Operator
Fourth Floor
85 Ormeau Road
Belfast
BT1 7SH

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Response to the Consultation on Biomethane Modifications to Gas Conveyance Licences

GMO NI welcomes the opportunity to comment on the proposed modifications set out in the consultation. As GMO NI administers the conveyance charging on behalf of the four Transmission System Operators, our comments are limited to the proposed changes relating to those arrangements.

We support the proposed modifications to the conveyance charging arrangements, which represent a proportionate and necessary step to ensure that Northern Ireland's gas conveyance framework is equipped to accommodate renewable gas injection from Gas Delivery Points (GDPs), including biomethane.

We agree that extending existing entry charging arrangements to apply to gas introduced at GDPs promotes consistency and fairness across all entry points, including interconnectors and renewable gas injection sites. This approach aligns with the proposals set out in GMO NI's published business rules for Non-IP (Interconnection Point) Entry Points¹. We also agree that the proposed modification supports the non-discrimination principles established under the Gas (Northern Ireland) Order 1996 and the Tariff Network Code.

We consider the proposed amendment to the definition of "Entry Point" to include a reference to "Gas Delivery Point" to be an effective and pragmatic means of achieving this alignment.

The consultation notes that there are currently no plans to introduce interruptible entry capacity products at Gas Delivery Points. GMO NI confirms that this remains our current position and therefore agrees that related licence modifications are not required at this stage. Should this position change in the future, it would be appropriate for the licences to be revisited accordingly.

As referenced in the consultation, GMO NI has proposed that capacity at Non-IP Entry Points be allocated on a "First Come, First Served" basis, in contrast to capacity at IP Entry Points, which is allocated via auctions. We therefore support the proposed drafting changes to reflect this distinction. The approach taken avoids unnecessary complexity in the licences while ensuring that the existing formulae for monthly Shipper invoices and reconciliation payments continue to function correctly.

¹ [Biomethane Non-IP Entry Points Transmission Business Rules Version 1.1 August 2023](#)

GMO NI welcomes the consideration of a potential discount for entry capacity at Gas Delivery Points. While it is recognised that no basis for such a discount has been identified at this time, should a justifiable case emerge, GMO NI would encourage the Utility Regulator to bring forward further licence modifications without delay. More broadly, we anticipate that additional licence changes will be required as biomethane policy continues to develop, and it will be important that any future modifications are implemented promptly and effectively to support this evolution.

In summary, GMO NI supports the proposed conveyance charging modifications outlined in Section 5 of the consultation.

We would be pleased to discuss any aspect of our response in more detail.

Yours sincerely,



Stephen English
Market Development Manager, GMO NI