



## Market Change Newsletter

Issue 21  
April 2025



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### Welcome

Welcome to the latest edition of our Newsletter!

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## **A Message from Liz Ferry – Head of Markets**



Welcome to our April Market Change newsletter.

As we step into a new performance year, I'm pleased to share that we are off to a fantastic start making strong progress across a number of our initiatives already. Gas quality developments remain a prominent area of focus for Market Change as described within this newsletter. Between the low wobble index implementation, gas quality data transparency updates, non-standard gas quality methodology development, & facilitating bio-methane connections onto the NTS, there is a huge amount of work in this space.

We are leading a review into the arrangements for the reservation of capacity (0901R) with the aim to reform this process to fit for purpose so please do ensure you feed into the process ahead of the workgroup report due to be presented to June's panel.

You'll see we have a number of new starters too, with the remit of Market change expanding to include energy response and resilience. We look forward to sharing more with you in due course on initiatives relating to this area.

As always, thank you for your engagement and please do get in touch if you have any feedback on the content of this newsletter, or any of the initiatives mentioned.

Liz Ferry

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## **Access, Balancing and Code Governance**

### **Single-sided Trade Nominations**

Following collaboration between the Proposer and National Gas Transmission, [UNC 0872](#) which was approved by UNC Panel in September 2024 has now been implemented to align with Gemini Sustain Plus go-live. Eligible Users may now elect to NGT to become a Clearing User and submit Single-sided Trade Nominations. This provides a positive

step towards a safer and more efficient method of clearing trades. If you would like further information or are considering applying, please reach out to [Gavin Williams](#), Code Change Lead.

### **NGT Raises First UNC Derogation Request**


The first UNC Derogation request, [D0001](#), has been raised by National Gas Transmission to enable a proof-of-concept hydrogen blending NTS transportation and power station consumption trail at Brigg, in collaboration with Centrica. Derogations were first introduced to UNC by Modification 0800 to enable the temporary disapplication of UNC provisions that would otherwise constrain innovative net zero trials, and we are therefore pleased to have progressed D0001 through the initial governance process. We would like to thank those who engaged with the process which may help pave the way for further innovative net zero trials. For further information, please reach out to [Gavin Williams](#), Code Change Lead.

### **Enabling Bio-methane Connections to the GB Gas Networks**

To facilitate the injection of biomethane and decarbonisation of the gas grid, National Gas Transmission (NGT) have been working collaboratively with industry stakeholders to develop the necessary UNC arrangements.

Modification Proposal 0887 (raised by NGT) would enable bi-directional connections to the NTS by independent Gas Transporter (iGT) pipelines thus facilitating delivery of biomethane to the NTS via these iGT pipelines. This Proposal is expected to be consulted on in April / May this year and we would welcome representations from interested parties.

NGT is also working with the Proposer of Modification Proposal 0894 to develop a solution to enable continued deliveries of biomethane to Distribution Networks (DNs) which otherwise may be subject to constraints at times of low DN demand. This would be achieved by flowing gas from DN to the NTS ('Reverse Compression') to create physical capability on the DN. NGT has subsequently raised an Alternative Proposal (0894A) which provides for commercial arrangements consistent with other points of entry to the NTS. Both 0894 and 0894A are currently being developed at Transmission Workgroup, and we would welcome views via email to [Gavin Williams](#) or through engagement with the ongoing industry process.



## Hydrogen Operability

As of January, the markets change area has created a new team looking at hydrogen operability, this will be a 2-year project aiming to answer the question: how will we operate a hydrogen system in the future? There are several areas the team will be working on:

**Market Framework Development** – Engaging with external stakeholders to develop market frameworks which will underpin early-stage hydrogen projects and assessing how these frameworks could develop into the future.

**Physical and Commercial Operations** – Reviewing our current system operator processes and developing new ones, focusing initially on the early stages of project union but also looking at how we transition to a larger and more complex hydrogen system.

**Emergency Framework Development** – Our current emergency management procedures may not be appropriate for a hydrogen system, so we'll be looking to develop a new emergency framework. This will also consider how the hydrogen network will interact with the methane and electricity systems in an emergency.

**System and Facilities** – A new hydrogen network will require new IT systems and facilities in order to be operated. Over the course of the project, we will be reviewing what systems and facilities will be required and when they would have to be put in place.

Since the team was set up in January, we have been focusing on planning and resourcing the project, as well as engaging with the Hydrogen Delivery Council which is initially focusing on network balancing options. Please contact [Peter Crook](#) for any further information.



## Gas Capacity

### **Capacity Methodologies Review**

In our last newsletters we highlighted that the 5 capacity methodology statements that we are obligated to publish under the Gas Transporter Licence are due to be reviewed by April 2025:

- ECR- Entry Capacity Release
- ExCR- Exit Capacity Release

- ECS – Entry Capacity Substitution
- ExCS- Exit Capacity Substitution and revision
- ECTT – Entry Capacity Trade & Transfer

Following both informal and formal consultations our submission to Ofgem was consulted on 27<sup>th</sup> December 2024 and Ofgem published their decision to approve these on 21<sup>st</sup> February 2025: [Proposed revisions to National Gas Transmission's Capacity Methodology Statements: decision | Ofgem](#)

The updated statements were effective from 22<sup>nd</sup> February 2025 and are published here: [Capacity methodology statements | National Gas](#)

For further information or to provide any feedback on this subject please contact [Nicola Lond](#).

### **0901R – Review of arrangements for reservation of NTS Capacity**

Workgroups have now been held in January, February, March and April to review the arrangements for the reservation of NTS Capacity.

Problem areas identified have been relating to the commitment required from parties wishing to reserve Entry Capacity in particular, and relating to the quantity of security required and the Net Present Value Test. These have been explored to gather experiences and feedback for the review group report.

We are seeking to hear about any experience relating to the reservation of capacity on the NTS which may be relevant to feed into this [UNC 0901R](#) review.

The next step is to compile the workgroup report for panel which is due in June.

For further information or to provide any feedback on this subject please contact [Nicola Lond](#).



## **Gas Quality**

### **1% Oxygen GS(M)R Exemption**

We are continuing to develop an evidence case to submit to the HSE to support an exemption request from GS(M)R that permits NGT (and GDNs for parts of their network that operate at above 38 barg) to convey gas with up to a 1mol% oxygen content. We

are pursuing this to encourage biomethane injection and are aware that elevated oxygen content may cause problems at some NTS offtakes, notably underground storage. If the exemption is successful, we therefore propose to consider the oxygen specification for producers on a case-by-case basis according to whether such gas could reach any sensitive sites. We have issued an informal industry consultation in connection with this – please see the item in this newsletter entitled ‘Non-Standard Gas Quality Methodology’ for more information. Please contact [Ahmed Jama](#) or [Philip Hobbins](#) for further information.

### **Low Wobbe Index Implementation**

The GS(M)R Review resulted in a reduction to the lower limit for Wobbe Index that is permitted for conveyance on UK gas networks from 47.2 MJ/m<sup>3</sup> to 46.5 MJ/m<sup>3</sup> with effect from 6<sup>th</sup> April 2025. We raised UNC Modification [0870: Amendments to Wobbe Index and Calorific Value Lower Limits at NTS System Entry Points](#) to enable implementation of the new lower limit into the operational contracts (Network Entry Agreements / Interconnection Agreements) that we have with those parties that agreed to do so. Ofgem approved this Modification on 21 March 2025; we are therefore now engaging with the relevant terminal and interconnector operators to make the necessary changes. As and when a contract is changed, we will issue a notification to all shippers. Please contact [Philip Hobbins](#) for further information.

### **Gas Quality Transparency**

The development of Modification 0870 highlighted the importance that some of our customers and stakeholders place on improved gas quality transparency. Our first phase is to deliver publication of near-real time and historical gas quality data that is measured at ‘within network’ points, i.e. at GDN offtakes, NTS compressor stations and multi-junctions. We are targeting delivery of this on our Gas Data Portal in September 2025. We will be engaging in the [UNC Gas Quality Workgroup](#) about what we should focus our efforts on next in this space, which could include data publication at NTS entry points and/or exploring the feasibility of gas quality forecasting services. Please contact [Ahmed Jama](#) for further information.

### **Non-Standard Gas Quality Methodology**

At the [Gas Quality Workgroup](#) on 7<sup>th</sup> April National Gas presented a draft of the Methodology for managing ‘Non-Standard’ Gas Quality Parameter requests which is published here [Draft Methodology Non Standard Gas Quality Workgroup \(31 March 2025\).pdf](#)

The methodology is to explain how National Gas proposes to consider requests from new connections where a request for a Gas Quality parameter is outside of the normal National Transmission System (NTS) Specification, which is set out in the template [Network Entry Agreement \(NEA\)](#). This will be applicable for both oxygen and carbon dioxide.

This methodology is particularly focused on requests for higher oxygen content into the NTS up to the GSMR level, as National Gas is seeing higher demand for this flexibility from potential biomethane connections. Whilst wanting to enable green gas connections to the NTS, National Gas is considering the balance of this with the existing connected customers to the NTS.

National Gas has already engaged with several stakeholders regarding this topic and taken this into consideration within the methodology.

During the workgroup discussion it was suggested that this methodology be wider circulated for an informal consultation period to provide the opportunity for further views.

Please provide any comments by response to [box.gsoconsultations@nationalgas.com](mailto:box.gsoconsultations@nationalgas.com) by 6<sup>th</sup> May 2025.

### **UNC Modification 0882s**

[Transparency of non-standard Gas Quality parameters at new entry connections to the NTS](#) was implemented on 1<sup>st</sup> April 2005

This introduced obligations on National Gas to provide greater transparency relating to new connections to the NTS that request non-standard gas quality parameters, outside of the normal NTS specification, as defined in the template Network Entry Agreement.

The templates, discussed and agreed with the workgroup, which National Gas will use for this purpose are now published on our National Gas Connections Document Library here: [Connections Document Library | National Gas](#)

The same web page will also be used to publish any notices issued.

For further information please contact [Nicola Lond](#).





## New Team Members

### Welcome Lauren Goodwillie!



Lauren has transferred to Markets from her role in the Customer & Stakeholder team where she worked primarily on customer engagement for Project Union, Clean Power 2030, and hydrogen blending.

Prior to NGT she moved from Nebraska to the UK to complete a degree in International Development and Humanitarian Emergencies. She has also worked with various levels of the US government regarding emergency management and resilience, including energy security. Lauren makes up one half of the new Energy Response and Resilience team joining us in Markets.

### Welcome Dan Harris!



Dan is the other half of the Energy Response and Resilience Team who joined us in early April. He holds a degree in Disaster Management and Emergency Planning and his working background is in emergency management. Specifically, Dan has moved from the Energy Emergency Team where he was responsible for ensuring that we at NGT have a trained and competent Network Emergency Management Team to comply with NEC safety case legal obligations. His current responsibilities include ensuring that NGT are interfacing with NESO from a REM (Resilience and Emergency Management) perspective.

### Welcome Ahmed Jama!



Ahmed joins us from Severn Trent, where he spent 7 years leading several operational and commercial teams in the water industry. With a track record in process improvement, stakeholder engagement, and regulatory compliance, he is now stepping into his role as Gas Market Change Lead. Ahmed is excited to contribute to market transformation and support the energy transition.

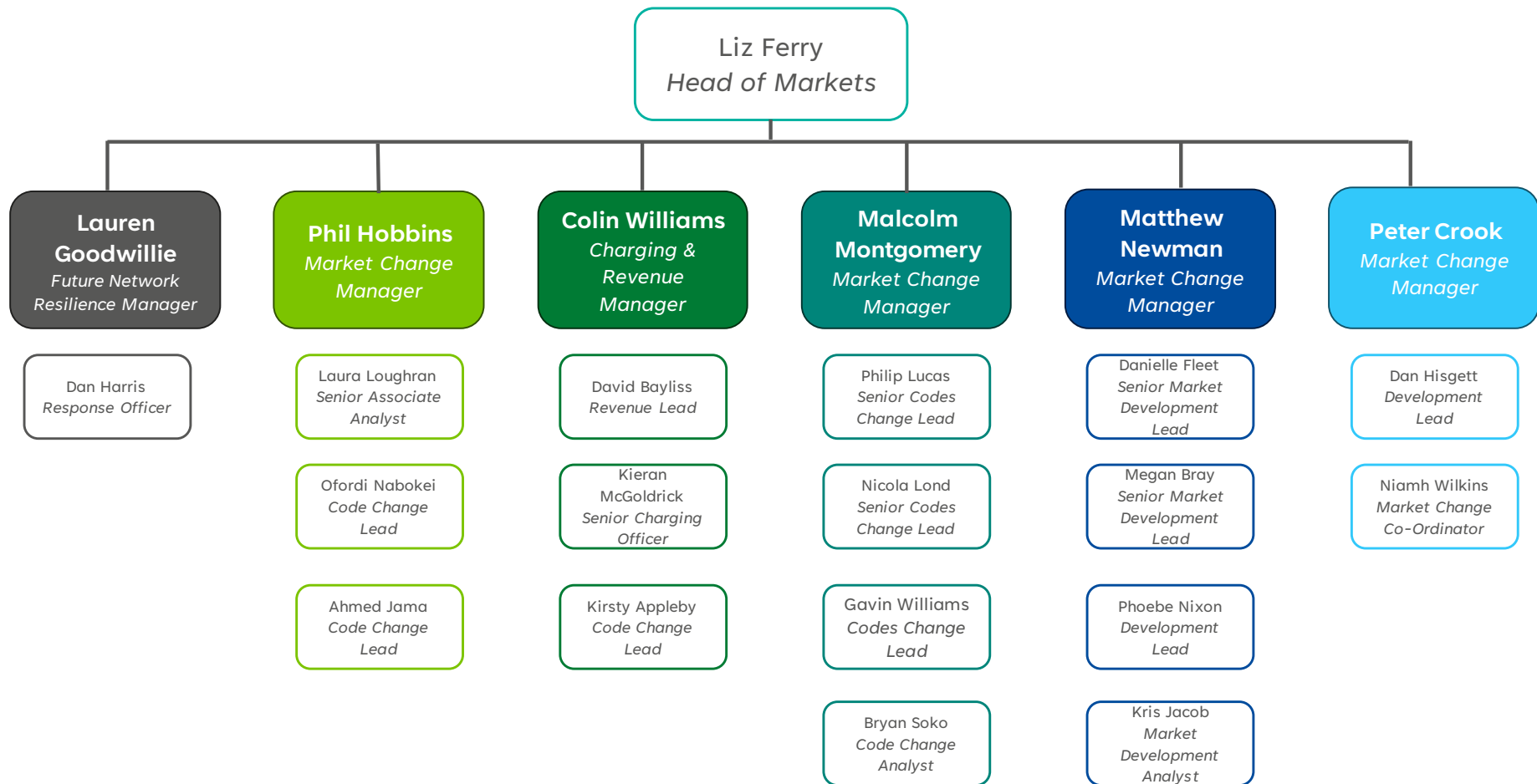


## Welcome Niamh Wilkins!

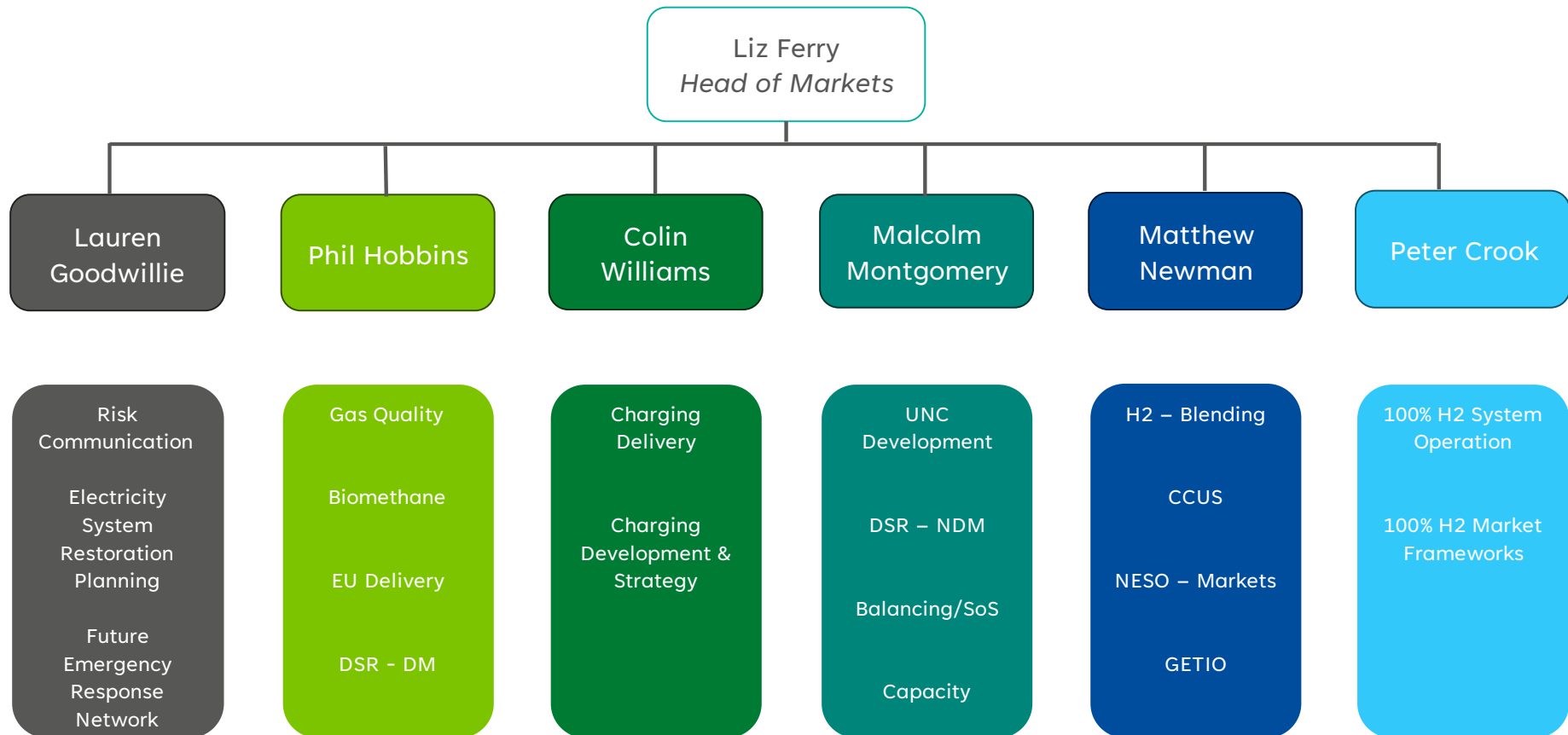


Niamh has joined us in the new role of Market Change Coordinator in March of this year. This position involves working with all the different branches within Market Change in an organisational capacity. She is new to the energy industry and eager to learn about the world of hydrogen operability and energy transition. She holds a bachelor's degree in Criminology with Forensic Science and has spent her early career working in the hospitality and entertainment industry.

## New Team Chart



## Updated Team Accountabilities



## **Contact Us**

We would love to hear from you! You can contact us by e-mailing:

[box.gsoconsultants@nationalgas.com](mailto:box.gsoconsultants@nationalgas.com)

You are receiving this newsletter because our records indicate that you are part of the NGT Stakeholder Community. If you no longer wish to receive similar e-mails regarding future gas market changes, please contact [Niamh Wilkins](#)