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**Per e-mail**

10 February 2025

Dear RIIO-3 Team

**Call for Evidence on the Electricity Transmission, Gas Transmission and Gas Distribution Business Plans for RIIO-3**

Thank you for the opportunity to respond to the call for evidence on the RIIO-3 transmission and distribution business plans published 18<sup>th</sup> December 2024<sup>1</sup>.

Interconnector Limited ("INT" or "we") is the owner and operator of the bi-directional natural gas pipeline, connecting GB with Belgium and wider European gas markets. INT is a strategic energy link for cross-border trade and security of supply. The pipeline provides 20 bcm/year of GB export capacity and 25.5 bcm/year of GB import capacity. When importing at full capacity, INT can supply over 25% of annual GB natural gas demand.

Gas Transmission 3 Business plan

As an adjacent TSO to National Gas, INT welcomes the business plan investment proposal seeking to provide secure and resilient supplies and a high quality of service. Gas networks will continue to play a critical role in the energy transition to delivery GB energy and security of supply needs. Funding for asset health is vital to achieve a resilient network and recognise increased investment needs as the National Transmission System (NTS) ages.

In particular, the NTS Bacton terminal will require appropriate ongoing asset health investment to protect its strategic importance for GB consumers. It plays a vital role in ensuring security of supply for GB consumers noting it regularly delivers 10-20% of GB gas supply and over 30% at

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<sup>1</sup> [https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3\\_Call\\_for\\_Evidence.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf)

critical times. Gas delivery via Bacton will continue to play an important role in the energy transition, particularly as GB requires more gas imports and more flexibility to balance intermittent renewable generation. Furthermore, INT is supportive of further asset health investment and improvements to the King's Lynn compressor station, given its importance to enable both Bacton GB exports and imports.

#### Ensuring safe, reliable and compliant gas at Bacton

We note the business plan makes no mention of appropriate mitigations to address the disruption and damage caused by the delivery of contaminated gas repeatedly from the NTS to Bacton Exit in recent years. This has caused significant market disruption to the detriment of NTS Bacton users, INT, GB and EU consumers. The continued exposure of this unmitigated risk brings a challenge to ensuring the key deliverables of "Operating the system safely, reliably and efficiently" and "Delivering a resilient network fit for the future" in RIIO-3. We would expect National Gas to outline more details on how the risk will be mitigated<sup>2</sup>.

If you wish to clarify anything in the letter, please do not hesitate to contact me ([Pavanjit.dhesi@interconnector.com](mailto:Pavanjit.dhesi@interconnector.com)). We are also available to discuss this further with you and the team.

Yours Sincerely

**Pavanjit S Dhesi**  
Head of Regulatory Affairs

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<sup>2</sup> At the time of writing this letter, Ofgem is still to make a determination on the Asset Health re-opener application by National Gas for Bacton NTS exit filter investment under RIIO-2.