



UK Government

Gas System in Transition: Security of Supply

Interim Response



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Ministerial Foreword

When we published the Gas System in Transition: Security of Supply Consultation in November 2025, we were clear that the only way to ensure our ongoing energy security, and to protect households from volatile fossil fuel prices, was to accelerate our move to low-carbon energy sources. This was independently verified by NESO, the energy system planner, in their Gas Security of Supply Assessment last year.

The global impact of events in the Middle East this year have further evidenced the urgency and importance of decarbonising our energy system. We have an alternative available to us in the form of home-grown, low carbon energy, and these events have underlined why we must stick with our long-term plan to move to clean energy and away from the price volatility associated with fossil fuels.

And as our country decarbonises, the amount of gas we use will decline, meaning gas will have a decreasing influence on our energy bills, increasing our energy independence and economic security, and protecting consumer bills.

However, we recognise that this transition will not happen overnight; the gas system will still play an important role in our energy system for decades to come.

We have a responsibility to the millions of households that will be heated by gas for years ahead, the industries that rely on it for essential production, and the power system in which gas continues to play a key role.

Thanks to our determination to decarbonise our energy system, our diverse supply sources of wind, solar, nuclear energy have suppressed the impact of recent events on our energy system, leaving us less affected than countries who rely primarily on gas, coal and oil.

However, because gas is a global commodity, with prices set on the international market, we have all had to pay more to attract the unaffected supply. With diminishing output from the North Sea over the past decades, any gas produced from the UK Continental Shelf represents a tiny fraction of global demand and so will not lower prices nor materially boost supply. We have therefore taken measures to help protect British families from the volatile gas market and break the link between gas and electricity prices.

The assets that form our gas system - geological storage, LNG terminals, interconnectors, North Sea infrastructure and the networks that connect them - will all help to make GB more secure and resilient throughout the transition. The aim of this consultation, and the wider 'gas system in transition' work is to ensure we are tackling the long-standing challenges and not ignoring them for the next generation.

We set out some of these challenges in our Update to Market 2025 and Gas in Transition consultation alongside our plans to address them. NESO's GSSA also highlighted risks to our

gas security of supply from 2030, driven by the structural decline of the North Sea basin, and pointing to the need for market intervention or investment in the system.

Whilst the government is pursuing a pragmatic approach to the North Sea, we have to accept the geological reality that North Sea gas production has declined by 74% since its peak in 2000 and we have been a net importer of gas since 2004. The North Sea can therefore no longer be relied upon to meet our energy needs and we will become more reliant on our import infrastructure.

Any form of government intervention or investment in the gas market would be unprecedented and cannot be a decision we take lightly. Until now, the market has operated freely and the system has consistently provided what we needed. Any interventions must therefore be targeted to a specific and impactful risk but should still represent value for money for the public, avoid distorting the market, and allow us to future proof the gas system.

This approach was largely reinforced by the responses to the consultation. While some respondents called for direct intervention from government, overall, the majority of respondents are keen for market forces to prevail as much as possible and are clear that government's role is to act as an enabler to optimise market functioning.

Given the breadth and complexity of the issues we consulted on, the risks, costs trade-offs, and potential unintended consequences of each of these options, further analysis is needed to fully measure the impact of any interventions and conclude which ones to pursue further.

However, we understand that ongoing market pressures and price volatility are contributing to continued commercial uncertainty that makes short and long-term investment decisions difficult. While the department continues to analyse the consultation responses, we want to reassure the gas sector that we understand the difficulties faced and that we appreciate the critical role they play every day in providing energy security for the British public.

Our intention is that by publishing an interim response to our consultation, we can provide some comfort to the sector and investors, that government does not take the role of the gas system for granted and hopefully ensure decisions can be taken today that help provide security for tomorrow.

Thanks again to those supporting government with this important work; I look forward to developing our plan together to protect our energy security over the coming months and years.

Michael Shanks MP

Minister for Energy

Introduction

This document presents the government's interim response to the *Gas System in Transition: Security of Supply Consultation*, which was launched on 26 November 2025 and closed on 18 February 2026. A full response will be published in due course.

Initial Findings

Our consultation set out government's analysis of the possible future supply and demand scenarios for natural gas from 2030 to 2050, and highlighted potential risks to our energy security, especially in extreme scenarios where we decarbonise slowly. The consultation also sought views on short-term policy and regulatory options, on longer-term reform of the sector's commercial model as well as on significant government investments in strategic infrastructure assets.

The consultation received a total of 115 responses from a wide range of organisations, infrastructure operators, industry professionals and individual members of the public. Because of the depth and breadth of the responses to our questions, we are not in a position to clarify all the next policy steps we will take, as we require further time to fully understand the impact of each policy proposal, the interdependencies between them, and how the market may respond to such interventions.

However, there were some areas where correspondents were largely in agreement, and where some consensus is already emerging, and this document has been prepared to share these initial findings and insights with the sector.

Priorities and the case for intervention

The consultation invited views on whether government intervention was necessary to deliver three priorities for our gas security:

- ensuring a level of infrastructure capacity to accommodate a broad range of demand, including the potential for low probability, high stress scenarios as UKCS supplies reduce.
- ensuring the system is resilient to unplanned infrastructure outages.
- ensuring the system has commercial models that allow infrastructure to operate.

Overall, respondents broadly agreed with these three priorities, and most respondents also believed that the market would not respond to achieve these priorities without government intervention. The reason provided was that the market is focused on financial returns and probable utilisation rather than on security of supply or resilience. There are simply insufficient commercial incentives for operators to hold additional capacity for peaks in demand that are low probability.

Current barriers to market entry were also regularly cited as a challenge to the delivery of these priorities. Responses noted that potential market entrants have struggled to progress beyond early development stages due to complex regulatory requirements, grid connection constraints, and ongoing investment uncertainty.

The responses clearly made a strong case for some level of government action, noting that any interventions should be proportionate and kept to a minimum, and that market-led solutions and leadership should be prioritised and enabled wherever possible. Action should deliver strong value for money and minimise impacts on consumer bills. Measures must remain consistent with and supportive of the longer-term transition away from fossil fuels.

Potential approaches

While responses to the consultation did not create a clear consensus on which specific interventions should or should not be explored and the form it should take, there were some clear themes and consistent messages that emerged.

Whilst we continue to work through the specific detailed responses, we can already signal government's intention to take forward work to ease regulatory barriers/burdens to allow the market the best chance of securing the system itself; to explore potential commercial support schemes to retain current capacity; to fully consider the support necessary for the development of additional import and/or flexibility capacity via a Floating Storage and Regassification Unit (FSRU), and/or a strategic gas storage reserve. We will fully consider which delivery vehicle is more appropriate for these interventions; whether these can be better delivered via government incentives to the market.

Regulation

Most respondents were clear that policy clarity and regulatory stability will reduce risk for investors and encourage the market to respond proactively.

As such, there was general agreement that measures to address regulatory barriers and support frictionless trade, such as raising the upper Wobbe limit and reforming the entry tariffs for the National Transmission System, would increase GB's competitiveness on the global LNG market and thus help secure imports. The complexity of the regulatory and permitting process was also identified as a barrier to the market independently developing new infrastructure.

While many of these regulations sit outside of DESNZ's competency (e.g. the Health and Safety Executive own the Wobbe Index regulations; National Gas and Ofgem are responsible for tariffs on the NTS), we will work closely with the relevant organisations to explore mitigating these barriers where possible.

Commercial Support

Consultation responses argued that weak commercial incentives and the declining overall demand for gas risk erosion of GB's gas supply capacity. Some market players have been

open about potential plans to reduce capacity and in recent years, we have seen some operators taking decisions to reduce capacity.

Government analysis in our consultation - and that of the independent NESO in their Gas Security of Supply Assessment in 2025 - highlighted potential energy security concerns under low probability but high stress scenarios. The likelihood and impact of such a risk is therefore exacerbated in the event of any market exit or reduced capacity without either significant peak demand reduction or new capacity coming online.

Given this, government recognises that changes are needed to help build a commercial landscape that provides sufficient incentives for existing gas supply infrastructure to continue to meet exceptional peaks in demand. A long-term commercial model in the form of financial or revenue support may be required. Government considers that such a scheme is most likely to be of benefit to GB's gas storage operators and two bi-directional gas interconnectors, where profit margins and forward bookings are in long-term decline.

Most respondents did not comment on the specific support model that should be introduced (e.g. Cap and Floor versus Regulated Asset Base), and where they did, there was no consensus on the form it should take. We will continue to work with the sector before including government's initial views on the design and scope of any potential support in the full response to the consultation.

Infrastructure

In light of negative supply-demand margins in low probability, high stress scenarios, such as an extremely cold winter compounded by critical infrastructure failure, the consultation sought views on options to add additional capacity to the network including an FSRU and strategic gas storage.

We received extremely detailed evidence on these options, and will require further time to fully ascertain costs, delivery timeframes, value for money and potential unintended consequences of each option. However, the responses largely agreed that the market alone is currently unlikely to provide any of these options and as such, government would likely be required to facilitate bringing these assets to market.

It was also evident that the costs of bringing a strategic gas storage reserve or an FSRU would likely be in the billions of pounds across a 25-year timeline. Government is therefore keen to understand what role it could play to help industry bring such an asset to market, or whether there is a case that can be made for government to bring these to market directly. As above, further analysis and work with the sector is required before providing an initial position on these options in the full consultation response.

Next Steps

We remain committed to taking action where there is a case for intervention to ensure a secure and resilient supply of gas that will help underpin our energy and national security during the transition to net zero.

We will continue to work through the consultation responses received and will engage the sector where required to further build our understanding of all the options, risks, costs and unintended consequences.

We plan to provide a fuller, detailed response to the consultation, setting out our 'minded to' position on all the options set out in the consultation in due course. We are mindful of the lead-in times to potential interventions and the pace required to ensure we remain on track to deliver any interventions before any risks to our gas security materialise.

Summary of Key Consultation Themes

This section provides a high-level summary of the key themes and issues raised in consultation responses. Questions not covered below will be explored in the full government response. Any views presented below are only used to illustrate the views of respondents, where there was agreement, disagreement or uncertainty; they are not the views of government. While not every individual point raised has been captured in this publication, all the views that were shared with us have been taken into consideration.

Analysis of responses

In reporting the overall response to each question, the 'majority' indicates the clear view of more than 50% of respondents in response to that question, and 'minority' indicates fewer than 50%. The following terms have been used in summarising additional points raised in the responses: 'most respondents' indicates more than 70% of those answering the particular question; 'a few respondents' means fewer than 30%; and 'many' refers to the range in between 30% and 70%.

Priority 1: Ensuring gas infrastructure capacity

- 1. Do you agree with the assessment that, as supply from the UK Continental Shelf continues to naturally deplete, imbalances between supply and demand may become possible in low-probability, high-stress scenarios? Please provide evidence to support your answer.**
- 2. In light of the analysis outlining the priority of ensuring gas infrastructure capacity, do you think the market will respond to provide such insurance for low probability, high stress scenarios? Please provide evidence to support your answer.**
- 3. What gas supply and demand scenarios are you using for planning in your organisation and why?**
 - a. What impacts to your sector/business have you identified using these scenarios?**
 - b. What mitigating actions are you considering against the supply and demand scenarios your organisation is using for planning?**

This section invited views on ensuring a level of infrastructure capacity to accommodate a broad range of demand. The majority of respondents (75%) agreed with the assessment outlined in the consultation, that, as supply from the UK Continental Shelf continues to naturally deplete, imbalances between supply and demand may become possible in low-probability, high-stress scenarios.

However, most did not believe that the market would proactively act to protect infrastructure capacity to account for low probability, high-impact events. About half of responses highlighted that market decisions are driven primarily by commercial incentives, noting that these tend to reflect day-to-day operational considerations, rather than maintaining capacity for low-probability but high-impact disruption scenarios. Therefore, it was argued that current market mechanisms are not structured to incentivise security of supply in high-stress scenarios.

Priority 2: Ensuring gas infrastructure resilience

- 4. Do you agree with the assessment that ensuring resilient infrastructure capacity is a key priority as the gas supply mix changes? Please provide evidence to support your answer.**
- 5. In light of the analysis outlining the priority of ensuring resilient infrastructure capacity, do you think the market will respond to achieve this priority? Please provide evidence to support your answer.**

This section sought views on the importance of resilient infrastructure in addressing the challenges outlined in the consultation. Almost all respondents (92%) agreed with the assessment outlined in the consultation, that maintaining reliable and resilient infrastructure capacity is essential.

Respondents were less unanimous on whether the market will respond sufficiently to achieve this priority. While a few argued that if an infrastructure asset is critical for resilience, the market will signal its value and respond, the most common response (39%) was that the market alone would not deliver. As GB has a privatised and liberalised gas system, investment and operational decisions are primarily driven by market incentives and prevailing supply and demand conditions, rather than preparing for low probability events in which infrastructure resilience could be tested.

Responses on the level or form of targeted government intervention varied, but many suggested some form of policy, commercial, or regulatory support would be necessary to incentivise investment to ensure resilient infrastructure.

Priority 3: Ensuring a commercial model that supports infrastructure capacity

- 6. Do you agree with our assessment that ensuring a viable commercial model for infrastructure capacity is a key priority facing the gas sector? Please provide evidence for your answer.**
- 7. In light of the analysis outlining the priority of ensuring commercially viable infrastructure capacity, do you think the market will respond to achieve this priority? Please provide evidence to support your answer.**

Priority 3 focused on whether the gas system has commercial models that will allow infrastructure to operate as needed.

Most responses agreed with the view set out in the consultation that a viable commercial model for infrastructure capacity is a key priority for the gas sector. Respondents argued that as gas demand declines during the energy transition, maintaining infrastructure capacity will become less commercially attractive, increasing the need for policy support or alternative commercial models. Disagreement was primarily about the relative priority of this compared with the other two priorities, rather than fundamental disagreement with the assessment itself.

28% of respondents felt that the market would respond if government provided long-term investment signals through policy clarity and regulatory stability, however, the majority (56%) of respondents did not believe that the market will respond to fulfil the priority without further incentives. The main reason given was that existing market incentives do not reflect the value of infrastructure that provides insurance against rare but high-impact events, limiting the commercial case for maintaining additional capacity. Storage and interconnectors were identified as sectors where these commercial pressures are most heightened.

LNG Terminals

8. Government's assessment is that existing LNG infrastructure is robust and commercially viable, do you agree?

a. If not, what actions do you think would be required to protect the strategic importance of existing LNG infrastructure?

9. Is there a strategic case for enhancing or expanding storage capabilities at LNG terminals?

a. What role should government play in supporting this?

Many respondents (41%) agreed with the Government's assessment that existing LNG infrastructure is robust and commercially viable, citing recent investments into Grain and South Hook and long-term contracts to support this assertion. Almost half (45%) of respondents agreed that there is a strategic case for enhancing or expanding storage capabilities at LNG terminals, citing benefits of LNG storage expansion as increased security of supply, operational flexibility and resilience against low probability, high-impact events as well as price volatility.

However, respondents also identified a number of challenges facing LNG assets with some arguing that UK LNG terminals are less competitive than those in continental Europe due to higher entry charges to the gas grid and high operating costs. LNG import capacity is also concentrated in a small number of locations, increasing exposure to compounding risks (e.g. extreme weather, infrastructure failure, or other disruption). Transmission constraints can limit full use of terminal capacity during peak demand, reducing resilience. Respondents therefore

suggested that greater geographic diversification and additional storage capacity would strengthen system resilience.

Floating Storage and Regasification Units

- 10. Do you agree with the assessment that the introduction of an FSRU could help ensure gas infrastructure and resilience? Please provide evidence to support your answer.**
- 11. Do you agree that there are no significant barriers to entry for new LNG entry points, including for an FSRU, and that the market can deliver additional capacity if this is necessary?**
 - a. If not, what could government do to resolve the barriers to entry for new LNG entry points?**
- 12. Do you consider there to be other advantages and/or disadvantages of government directly chartering and appointing an operator of an FSRU, to be operated as a strategic gas supply source?**
- 13. If HMG were to directly charter an FSRU, please explain whether and how you think this would impact your role in the market and your current operating model?**

There is broad recognition that an FSRU could contribute to gas system resilience, particularly by diversifying supply entry points and providing additional flexibility in low-probability, high-stress events. Many respondents viewed an FSRU positively as part of a wider package of resilience measures, and some cited international examples where FSRUs had enhanced security of supply.

However, support was generally qualified: respondents frequently stressed that the benefits would depend on factors such as location, integration with the National Transmission System, and the operational model adopted. There was also significant support for removing barriers to new LNG infrastructure through streamlined regulation and permitting, clearer policy direction, infrastructure planning, a review of NTS capacity allocation, and potentially financial support from government.

At the same time, respondents expressed notable reservations about both commercial and government-led FSRU deployment. Many argued that existing LNG import capacity is already sufficient or underutilised, questioned whether an FSRU would materially improve resilience, and highlighted its limited storage capability. There were also significant concerns about market distortion, particularly if government directly chartered an FSRU, with respondents warning this could crowd out private investment, undermining existing supply assets.

Interconnectors

14. How can the strategic importance of interconnector capacity be protected, and what actions do you think might be required?

Responses showed support for interconnectors as critical strategic assets due to their flexibility, their help maintaining supply diversity and routes to European markets, and cross-border trading. However, some respondents did raise concerns that overreliance on interconnectors can lead to uncertainty during European or global supply shocks, when imports to GB cannot be guaranteed. Responses suggested they should be seen as part of a balanced and diverse supply mix.

Respondents generally supported measures to protect the strategic value of interconnector capacity, with commercial support mechanisms most frequently identified as a potential option. There was consensus that these should be evidence-based, proportionate and mindful of customer costs and market distortions. While some respondents referenced the need for long-term capacity bookings, which could help to create revenue certainty for operators, there was no clear view on how this could be delivered.

Some responses also supported regulatory enhancements such as including reducing GB entry costs and regulatory barriers to boost interconnector flows and competitiveness, as well as maintaining close operational and regulatory co-operation with Europe and aligning UK-EU gas quality standards.

Geological Storage

15. How can geological storage capacity and deliverability levels be protected and what actions do you think might be required?

16. To what extent do you think targets and compulsory stock obligations would address any of the three priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; and commercially viable infrastructure capacity)? Please provide evidence to support your answer.

Responses highlighted three main themes for protecting geological gas storage. The most common view (a third of respondents) was support for targeted government intervention for areas where market arrangements alone may not deliver sufficient security of supply. Others emphasised the importance of a stable regulatory environment, coordinated whole-system planning, and clear long-term policy signals (21%), while a smaller group (19%) argued that investment should remain largely market-led, with only limited government involvement. Additional suggestions included recognising gas storage as a strategic national infrastructure, introducing nationalised or state-led strategic storage arrangements (see Strategic Storage section below) and reforming grid connection pricing.

Many respondents also stressed the importance of looking beyond current gas markets and towards the energy transition. Around 21% highlighted the potential future repurposing of storage infrastructure for hydrogen or biomethane, viewing this as a way to maintain energy security while supporting net zero objectives.

Views were more divided, with most expressing concerns, about mandatory targets or compulsory stock obligations. The main risks raised were market distortion, narrower seasonal spreads, higher costs, and weaker commercial viability for storage facilities, illustrating that these measures could potentially reduce system resilience rather than enhancing it.

Strategic Gas Storage

- 17. What are your views on the strategic storage options outlined above in relation to addressing the priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; and commercially viable infrastructure capacity)?**
 - a. Do you recommend a specific strategic gas storage option?**
 - b. Are there any alternative strategic gas storage options we have not listed?**
- 18. How would a strategic storage reserve impact your role in the market (would it have a positive, neutral, or negative effect on your current operating model)?**
- 19. Who would be best placed to operate a strategic storage site, purchase the gas, and set conditions of use?**
- 20. What other factors, including gas usage and refilling terms, should be considered in any strategic gas storage proposal (either through new facilities or by securing capacity at existing sites)?**
- 21. What are the implications of leasing part of an existing or future storage site, either in GB or abroad?**
- 22. Please provide any evidence on the cost of developing a new storage facility.**
- 23. Please provide any estimations on the cost of leasing existing storage capacity**

Responses expressed cautious and highly-conditional support for strategic storage, with stakeholders generally recognising potential resilience benefits. Support was contingent on careful scheme design that avoids distorting market signals, undermining commercially viable storage, or creating unintended consequences. A common preference emerged for a hybrid delivery model, combining government oversight with commercial operation, and for any reserve to function strictly as an emergency backstop rather than a routine market intervention.

Development of new storage was seen as high-cost and uncertain, with capital requirements ranging from hundreds of millions to over £1 billion and potentially doubling for hydrogen-ready facilities.

Overseas storage leasing was largely opposed (around 60%), with respondents citing geopolitical, regulatory and access risks and questioning its reliability as a strategic solution. Evidence on leasing costs was limited, with nearly half of respondents noting variability and a lack of robust data, making it difficult to assess value for money.

Commercial Support Options

- 30. Do you think the possible commercial support options outlined would address any of the three priorities set out in Chapter 2 (ensuring sufficient infrastructure capacity; ensuring resilient infrastructure capacity; or commercially viable infrastructure capacity)? Please include any additional evidence you have on why action of this kind is/is not required in your answer.**
- 31. If you do think these commercial models address one of the three priorities, which option(s) do you believe to be most appropriate? Please provide evidence of how these options could work for the three types of gas flexibility facilities (LNG terminals, interconnectors, and storage sites) focused on in this chapter.**
- 32. What might be the possible advantages and drawbacks (including unintended consequences) of such an intervention in the market?**
- 33. Are there other alternative models that are preferable to those listed above? Please outline the basic principles of an alternative model and why you would believe it would be more appropriate.**
- 34. What are the risks and opportunities of interaction between a possible gas storage commercial support model and other business models in energy, notably hydrogen storage and carbon dioxide storage?**

Views on commercial support were mixed: 51% of respondents to these questions highlighted both advantages and disadvantages, while 36% were supportive, including most existing flexibility operators. Only five of the 42 respondents who answered this opposed intervention.

The main concern expressed was the risk of market distortion, with respondents stressing that any support should be targeted, proportionate, evidence-based and tailored to specific infrastructure types. It should also account for declining gas demand which will further erode profitability.

Most operators of current or prospective gas storage sites, LNG terminals or interconnectors expressed support for the principle of a commercial support model. They emphasised the key role that flexibility assets play in providing energy security and reiterated that the market does not value this sufficiently to independently deliver commercial viability of the sector.

No single support model emerged as a clear preference. However, infrastructure operators most commonly favoured a Cap and Floor-type approach, with some support for a Regulated Asset Base (RAB) and Contract for Difference (CfD) style models. Respondents also proposed

alternative approaches, including system-operator-led capacity tenders and hybrid models combining elements of multiple support mechanisms.

Most respondents (65%) saw opportunities for commercial support to facilitate future hydrogen and CO2 storage and prevent stranded assets.

Wobbe Index

- 41. To what extent would increasing the upper Wobbe limit address any of the three priorities set out in Chapter 2 (ensuring we have sufficient supply capacity to meet future demand; ensuring resilient supply capacity; and ensuring commercially viable supply capacity)? Please provide evidence to support your answer.**
- 42. Would increasing the upper Wobbe Index limit strengthen GB's energy security and competitiveness in the global LNG market and, if so, why?**
 - a. What would be the impact of making no changes to the upper Wobbe Index limit?**
- 43. What impact would increasing the upper Wobbe Index limit have, particularly in relation to cost and operational burdens, for your organisation, whether positive or negative?**

The majority of respondents noted that raising the upper Wobbe limit would help address all three priorities, especially in the context of declining supply from the UKCS and GB's resulting increased reliance on imports. However, some stakeholders argued against raising the upper Wobbe limit due to increased risks of power trips and performance degradation of power generating equipment. Due to clear benefits and risks to overcome, many respondents argued a comprehensive, whole-system impact assessment and safety evaluation should be carried out. There were several calls for more engagement with industry, better clarity on timings, and more transparency on the regulatory process.

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