



UK Government

Gas system in transition

Call for Evidence on the recovery of gas network costs during the transition

Closing date: 23 December 2026



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Ministerial foreword

This government is determined to put lower bills, energy security and consumer protection at the heart of the transition to a clean energy future.

How we heat our homes and power our economy is changing. Over time, more households and businesses will move away from natural gas and towards clean power. Recent years have demonstrated why this matters. Over the past five years, families and businesses across the country have been hit by energy price shocks driven by volatile international gas markets beyond the UK's control. These pressures have underlined the importance of building a more secure and affordable energy system, while ensuring that the costs of change are managed carefully for consumers.

As we make this transition, we must also ensure that the costs of maintaining our energy infrastructure remain affordable and are shared fairly. Even as we accelerate towards net zero, there will still be many homes and key parts of the economy that will rely on gas for years to come. We are absolutely clear that the transition must be orderly, fair and consumer-focused, and that no household should face unreasonable costs simply because they cannot yet make the switch.

This is why we are taking a proactive approach to considering how gas network costs should be allocated and recovered as the energy system evolves. This includes both the costs of maintaining and investing in the network for those who continue to rely on it, and the costs associated with increasing numbers of consumers disconnecting from it. Addressing these issues together is essential to protecting affordability, allocating costs fairly and providing confidence that essential infrastructure will continue to operate safely and reliably for those who depend on it.

This Call for Evidence is an important step in building the evidence base needed to inform future decisions. By gathering views and evidence now, we can ensure that any future approach is grounded in a clear understanding of the impacts on affordability, fairness and energy resilience.

I strongly encourage stakeholders across the energy sector to engage with this process. Your insights and evidence will help ensure that, as the way we use the gas network changes, consumers are protected from unfair costs, unnecessary disruption is avoided and essential infrastructure continues to operate safely and reliably.

Michael Shanks MP
Minister for Energy

General information

Call for evidence details

Issued: 22 October 2026

Respond by: 23 December 2026 at 11.59pm.

Enquiries to:

Gas Systems, Energy Security and Resilience Directorate
Department for Energy Security and Net Zero
5th Floor
3-8 Whitehall Place
London
SW1A 2EG

Email: gasnetworks@energysecurity.gov.uk

Consultation reference: Gas system in transition: Call for evidence on the recovery of gas network costs during the transition.

Audiences:

The Call for Evidence will be of interest to all parties in or outside of Great Britain (GB) with an interest in GB's gas system, including gas consumers and consumer representatives; Gas Distribution Networks, Independent Gas Transporters and the gas transmission operator; energy suppliers; investors and lenders; clean-heat and district-heating organisations; local authorities and regional energy planners; organisations involved in gas disconnections; regulators and safety bodies; academics; and other parties with an interest in the fair allocation and recovery of gas network transition costs.

Territorial extent:

The territorial extent of the Call for Evidence is Great Britain only, as energy policy is devolved to Northern Ireland. Responses are however encouraged from all parts of the UK, given the close relationship between GB and Northern Ireland gas security. Certain topics under consideration may relate to policy matters that are devolved to Scotland, Wales and Northern Ireland, and the department will work with devolved administrations on any policy development to ensure policies take account of devolved responsibilities. Some statistics within this document may refer to UK-wide figures when more readily available.

How to respond

Email to: gasnetworks@energysecurity.gov.uk

Respond online:

<https://energygovuk.citizenspace.com/energy-security/gas-system-in-transition-recovery-of-network-costs>

Write to:

Gas Systems, Energy Security and Resilience Directorate
Department for Energy Security and Net Zero
5th Floor
3-8 Whitehall Place
London
SW1A 2EG

When responding, please state whether you are responding as an individual or representing the views of an organisation.

Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome.

Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please tell us, but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We will process your personal data in accordance with all applicable data protection laws. See our [privacy policy](#).

We will summarise all responses and publish this summary on [GOV.UK](#). The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

Quality assurance

This consultation has been carried out in accordance with the [government's consultation principles](#).

Gas system in transition: Call for Evidence on the recovery of gas network costs during the transition

If you have any complaints about the way this consultation has been conducted, please email:
bru@energysecurity.gov.uk.

Why we are launching this Call for Evidence

The UK's energy system has fundamentally changed, with the increasing use of clean power and heating. As a result, demand for natural gas is expected to decline over time, reflecting changing consumer choices and efforts to reduce exposure to volatile international fossil fuel markets. Managing this transition in an orderly and affordable way is essential to protect consumers, maintain energy security and ensure the continued safe operation of essential infrastructure.

The gas network will continue to play an important role for many years, supporting heating, industry and wider energy system resilience. However, increasing numbers of consumers will choose to adopt cleaner heating alternatives, and overall gas demand is expected to decline. Together, these changes raise important questions about how gas network costs should be allocated and recovered as the system evolves.

Falling gas demand creates two related cost-recovery challenges because network costs may increasingly need to be recovered from a declining gas user base. Firstly, the gas network will continue to require investment to operate safely and reliably for consumers who remain connected. Secondly, an increasing number of consumers disconnecting from the network may increase disconnection-related costs. While distinct issues, both involve ensuring that costs are recovered in a way that is fair, affordable and sustainable as the number of gas consumers declines over time.

During our journey towards net zero it will be increasingly important to protect bill affordability for households and businesses that continue to rely on the gas network, particularly vulnerable and fuel-poor consumers, by managing how these costs are shared across a shrinking consumer base. Historically, network investment costs have been recovered from gas consumers through charges regulated by Ofgem. This framework has supported investment in safe and reliable infrastructure over recent decades. Separately, disconnection costs have generally been low because disconnection volumes have been small and infrequent. However, as the transition progresses, both the profile of network costs and the scale of disconnection activity may change significantly.

The government is therefore seeking evidence on the potential long-term implications of these changes. We are interested in understanding how future costs may develop, what principles should guide decisions on their allocation and how different approaches could affect consumers, consumer behaviour, investors, network operators and the wider energy system. We are particularly interested in evidence relating to affordability, fairness, investment confidence and the effective management of the transition.

This work will also align closely with Ofgem's Cost Allocation and Recovery Review (CARR), which is considering the principles that should guide the recovery of energy system costs. While its initial focus is on domestic electricity consumers, the next phase will consider gas costs. The government is working closely with Ofgem on the Review and will seek to ensure that this work and the evidence gathered through this Call for Evidence are complementary and closely aligned.

This Call for Evidence is intended to build the evidence base needed to inform future policy development. It does not propose specific solutions or indicate preferred policy options and outcomes. Rather, it seeks views on the challenges, trade-offs and evidence gaps associated with these issues.

The evidence gathered through this Call for Evidence will help the government better understand these challenges and inform consideration of any future policy development in this area. The government welcomes evidence from across the gas and wider energy system, including consumers and consumer representatives, network operators, investors, energy suppliers, local authorities, regulators, think tanks, academia and other interested parties.

Scope of this Call for Evidence

This Call for Evidence seeks evidence on how costs associated with the gas network should be allocated and recovered as gas demand evolves. This includes two related questions: where these costs should ultimately fall, including across current and future gas consumers, wider energy consumers and taxpayers; and the mechanisms through which these costs should be recovered in practice. It focuses on two related areas:

- The recovery of network investment costs associated with maintaining and operating the gas transmission and distribution networks; and
- The recovery of costs associated with gas disconnections for consumers no longer needing a connection to the gas network.

We are interested in evidence on:

- How these costs may develop over time as gas demand changes.
- The principles that may guide decisions on how these costs might be allocated and recovered as gas demand declines.
- The implications of different approaches for the affordability of consumer bills, fairness, consumer protection, investor confidence, system resilience and the effective management of the transition.
- The extent to which declining gas demand and future cost recovery differs across types of gas network operator, including Gas Distribution Networks (GDNs), the National Gas Transmission Network (NGT) and Independent Gas Transporters (IGTs).

This Call for Evidence is composed of two main cost-recovery sections. Section 1 covers the recovery of network investment costs, while Section 2 focuses on the recovery of disconnection costs.

Out of scope

This Call for Evidence does not seek evidence on:

- Costs associated with decommissioning the gas networks.

- Wholesale gas prices and other non-network elements of energy bills.
- Wider affordability and social policy measures, which are being considered through separate processes.
- Detailed decisions on hydrogen deployment or carbon capture, which will be covered in future engagement.

Section 1: Recovery of network investment

While gas demand is expected to decline in line with net zero, the gas network will continue to require investment to operate safely and reliably for as long as it is needed. This includes expenditure to maintain existing gas infrastructure, replace ageing assets and respond to safety requirements in order to continue providing the services needed to those consumers who continue to rely on the network. The allocation and recovery of those costs is likely to become increasingly important as the transition away from gas progresses.

Currently, costs relating to essential investment in the gas network are recovered from gas consumers through a regulatory framework overseen by Ofgem. This framework has supported investment in a safe and reliable gas network over the last few decades, while providing network operators with a degree of confidence in relation to the recovery of these costs over time.

As households and businesses gradually move away from gas, it becomes increasingly important to manage how the largely fixed costs of maintaining and operating the network are shared across a shrinking consumer base. Addressing this early can help manage upward pressure on bills and reduce the risk of a self-reinforcing cycle in which higher charges accelerate further disconnections.

Maintaining affordability is particularly important for households and businesses that face barriers to decarbonising, including vulnerable and fuel-poor consumers. At the same time, future arrangements will need to ensure that network operators remain able to plan, finance and deliver the investment required to maintain a safe and reliable network.

Network companies need to be able to attract long-term investment, which depends on confidence that costs can be recovered within a stable and predictable framework. Investor confidence is influenced by both investability and financeability.

Investability relates to how attractive the network is to investors, including confidence that they will earn a fair return on investment, taking account of both past and future capital committed to the network.

Financeability relates to the ability of companies to raise and service debt on sustainable terms, for example through bank lending or capital markets, without facing excessive costs or risks.

Maintaining a stable and predictable framework can therefore help keep financing costs down, ultimately reducing the costs passed on to consumers.

A clear and consistent regulatory approach to the treatment of assets over time will become increasingly important in managing expectations around asset lifetimes and value. Uncertainty in these areas could increase financing costs, with potential knock-on effects for consumer

bills. Maintaining investor confidence is therefore closely linked to protecting affordability for those who remain connected to the gas network.

In a regulated environment which calibrates risk and reward, careful consideration will be needed as to how risks associated with declining gas use are allocated over time. A balanced approach to risk allocation can help reinforce confidence in the stability of the regulatory framework, support continued investment in safe and reliable networks and help keep financing costs as low as possible.

Ofgem has already taken steps to respond to these challenges, including accelerating depreciation for new gas distribution network investment from April 2026. While this brings forward the recovery of new investment, it does not resolve questions about the long-term recovery of historic investment as demand continues to evolve.

This Call for Evidence therefore provides an opportunity to gather views on how these challenges may develop over time, the implications for consumers, network operators and investors, and whether different approaches to recovering gas network costs may need to be considered in the future. This section focuses specifically on long-term investment recovery and sits alongside wider government and Ofgem work on the gas system in transition.

Section 2: Recovery of disconnection costs

As the transition to lower-carbon forms of heating progresses, an increasing number of consumers are expected to move away from natural gas over time, disconnecting from the gas supply network. A disconnection happens when a property's connection to the mains gas supply is permanently terminated and the physical link with the gas network is removed. There are currently two routes by which consumers disconnect from the gas network:

A voluntary disconnection: where a consumer requests and pays for a disconnection directly from their gas network operator, often in conjunction with other works to the property; and

A health and safety disconnection: which follows the removal of a gas meter when the gas supply remains unused for a period of 12 months and the gas network operator is required to permanently terminate the gas connection for safety reasons.

Under current arrangements, most gas network disconnections follow the health and safety route, and the associated costs are recovered from gas consumers through network charges regulated by Ofgem.

However, as gas use changes over time, it is important to consider whether current arrangements will remain appropriate over the longer term. Greater adoption of low-carbon heating technologies could lead to increasing levels of disconnection activity over time. While disconnection volumes remain uncertain, a larger scale of disconnection activity may have implications for how costs are allocated and recovered, and for the affordability of energy bills for different groups of consumers.

At the same time, there remains considerable uncertainty regarding the future cost of disconnections. Increasing volumes may create opportunities for innovation, operational efficiencies and more coordinated approaches to delivery. For example, area-based decarbonisation programmes, such as district heating, may create opportunities to undertake disconnections more efficiently than is possible today. The government, Ofgem, industry and other regulators continue to explore opportunities to improve processes, reduce costs and ensure that disconnections can be delivered safely and effectively at scale.

Ofgem's recent Gas Disconnections Framework Review and accompanying Disconnections Action Plan set out its assessment of the current arrangements and the actions it intends to take to improve the gas disconnections framework. This includes clearer consumer guidance, greater transparency over costs and charging, stronger service standards and consumer protections, improved monitoring and clearer accountability. Ofgem also intends to encourage technical and operational innovation to help reduce disconnection costs and support scalable delivery.

Ofgem has also changed how elements of disconnection expenditure are treated during the RIIO-3 gas distribution price control period, including the Disconnections Volume Driver, which better reflects actual disconnection volumes and provides greater visibility of future costs. This Call for Evidence complements that work by focusing on the longer-term question of how disconnection costs should be allocated and recovered, including how those costs should be shared between consumers who disconnect, consumers who remain connected, wider energy users and taxpayers.

As disconnection volumes increase and costs evolve, the government may need to consider whether changes to the allocation and recovery of disconnection costs are required. Decisions in this area could have implications for affordability, fairness, consumer behaviour and the wider energy transition. We are therefore seeking evidence on how these challenges may develop, the implications for consumers and network operators and whether changes to the cost-recovery arrangements may be needed as the gas transition progresses.

The implications of future disconnection volumes may differ across the gas distribution sector. Independent Gas Transporters (IGTs) and Gas Distribution Networks (GDNs) currently operate under different regulatory arrangements and may face different challenges in recovering costs as consumer numbers decline. The government is therefore interested in evidence on whether future approaches to disconnection cost recovery should apply consistently across the sector or whether there are circumstances in which different approaches may be justified.

Section 3: Principles for cost recovery

The principles below provide a framework for considering the evidence received through this Call for Evidence. They are intended to support consideration of the evidence received for both the network investment cost recovery and the disconnections cost recovery as the gas network evolves. The principles do not indicate preferred policy outcomes. Instead, they are set out to reflect the outcomes the government considers important as the gas system changes and the transition progresses.

Principle 1: Fair and affordable for consumers

Throughout the transition, any cost recovery approach should protect current and future consumers and ensure gas network charges remain fair and affordable, including ensuring no specific groups of consumers face disproportionate impacts. Evidence on consumer outcomes, distributional effects and affordability should be a key consideration in any future approach.

Principle 2: Support an orderly transition

Future approaches to cost recovery should support a safe, efficient and orderly transition of the gas system over time, consistent with the UK's decarbonisation and net zero objectives. The way in which costs are recovered could influence consumer behaviour, network operations and ultimately the pace of transition. It will therefore be important to understand how different approaches could support the transition, contribute to positive consumer outcomes and avoid unnecessary disruption. Consideration should also be given to whether different approaches could encourage or discourage the uptake of low-carbon heating.

Principle 3: Ensure resilience and investability

The gas network will continue to play an important role during the transition, including for consumers who remain dependent on it. It will need to remain safe, resilient and able to meet consumer demand. Cost recovery arrangements should support this, while maintaining the confidence needed for network operators to plan effectively and access finance where required. Evidence on how different approaches could affect system resilience, investor confidence, financeability and the cost and availability of finance will therefore be relevant.

Section 4: Potential approaches to cost recovery

The challenges described in Sections 1 and 2 raise important questions about how gas network costs should be allocated and recovered during the transition. This section sets out a range of potential approaches that could help address these challenges, each differing in how costs are recovered and how risks are shared between consumers, network operators, investors and government.

These approaches are intended to provide a framework for gathering evidence on potential benefits, risks and trade-offs associated with different options. They do not represent preferred or fully developed solutions, and the government is not proposing any specific policy approach at this stage. Any future decisions will be informed by the evidence gathered, alongside wider considerations related to energy affordability, fiscal sustainability and the regulatory framework.

1. Continuing with recovery from gas consumers

This category includes approaches that would maintain the principle that gas users pay for all gas network costs but adjust how these costs are recovered.

Options include:

- Changes to the profile and timing of cost recovery, including faster or more flexible approaches to depreciation that could bring forward or spread the recovery of costs over time;
- Adjusting recovery profiles in response to actual rates of consumer disconnection;
- Differentiating approaches where demand declines at different speeds across regions; or
- Changes to how specific categories of costs, including disconnection-related costs, are allocated and recovered.

These options may reduce longer-term risks associated with cost recovery and maintain a clearer link between gas network costs and gas consumers. However, they could also increase affordability pressures as costs are recovered from a declining gas user base.

2. Recovery from a broader group of energy users

This category reflects approaches that seek to reduce pressure on a declining gas consumer base by spreading some costs more widely, reflecting the role the gas system plays in supporting the wider energy system.

Options include:

- Sharing costs with electricity consumers where the gas network continues to support wider energy system security; or
- Recovering costs from future users of repurposed network assets, such as hydrogen, biomethane or carbon capture.

These options may help reduce pressure on a shrinking gas consumer base, but could raise questions about fairness, the distribution of costs and impacts on incentives across the wider energy system. Depending on how costs are allocated, these options could also influence consumer behaviour and potentially disincentivise the uptake of low-carbon heating.

3. Government-backed mechanisms

This category covers approaches where government plays a more direct role in supporting cost recovery or managing risks that may not be sufficiently addressed through consumer charging alone.

This could range from limited financial backstops or guarantees to more direct forms of support. Potential rationales include protecting affordability or supporting wider public objectives such as net zero.

Such approaches could help reduce affordability pressures, provide greater certainty regarding cost recovery and address risks that might otherwise be concentrated on a relatively small group of consumers. However, they would also involve potential fiscal exposure and raise broader questions on the role of government in funding costs associated with the gas network.

4. Hybrid approaches

This category reflects approaches that combine multiple mechanisms over time, recognising that the most appropriate approach to cost recovery may change as demand patterns, consumer behaviour, network costs and disconnection activities evolve.

A combination of approaches may better balance affordability, fairness, investability and financeability over time. For example, this could involve consumer-funded recovery in the near term, with additional mechanisms triggered only if affordability thresholds are reached.

We welcome evidence on how such hybrid approaches could work in practice, including how they might be sequenced over time, governed and adapted to respond to changing system conditions.

Call for Evidence questions

The questions below seek evidence on the issues and approaches outlined in this document. Respondents are encouraged to provide evidence, analysis and real-world examples where possible.

About you

1. **What is your role or interest in the gas system or the wider energy system?**
2. **Which parts of the gas system are most relevant to your response (for example domestic consumers, industry, networks, finance or regulation)?**
3. **Please indicate whether your evidence relates primarily to network investment costs, disconnection costs or both.**

The gas network in transition

4. **What are the main cost-recovery challenges facing the gas network as demand changes?**
5. **How might these challenges affect consumers, network operators and the wider energy system?**
6. **What evidence do you have on how these challenges may evolve over time?**

Affordability and fairness

7. **What risks, if any, do you see to affordability for households or businesses as gas demand declines, including both those that remain connected to the gas network and those that choose to disconnect?**
8. **How might different groups of consumers be affected differently?**
9. **Are there particular consumer groups or geographic areas that may be disproportionately exposed to future costs?**
10. **What options should government consider for allocating costs between domestic consumers, non-domestic consumers and wider energy consumers?**

Network investment cost recovery

Investment and confidence

11. **How do current arrangements for recovering gas network investment affect investor confidence and the ability of network companies to attract finance?**
12. **How might the cost and availability of finance for gas network investment change as gas demand and the number of consumers connected to the network decline? What factors are likely to drive these changes?**
13. **What evidence is available on financing approaches that could support continued investment in networks with declining demand and consumer numbers, including relevant international or sector examples?**

Approaches to recovering network investment

14. **What are the potential strengths and drawbacks of continuing to recover gas network costs primarily from gas consumers as demand declines?**
15. **What are the potential strengths and drawbacks of spreading some gas network costs more widely across the energy system?**
16. **Under what circumstances, if any, might there be a role for government in supporting gas network investment recovery, what form might it take, and what objectives should such involvement seek to achieve?**

Affordability and fairness

17. **How could different approaches to recovering gas network investment costs affect the affordability of energy bills, including for consumers who remain connected to the gas network and those who move away from gas?**
18. **How might the impacts of different cost-recovery approaches vary between different groups of consumers, including vulnerable and fuel-poor consumers?**

Design and timing

19. **What factors should determine the period over which costs are recovered, and what would be the implications of shortening or extending recovery periods for consumers, network operators and investors?**
20. **Under what circumstances, if any, might changes to existing cost-recovery arrangements be appropriate, and what factors or triggers should inform when such changes take place?**
21. **How could different approaches be designed to balance affordability and fairness with investor confidence and the continued safe and reliable operation of the gas network?**

Hybrid or alternative approaches

22. Do you see a case for combining different approaches over time? If so, what might that look like in practice?
23. Are there alternative approaches, or relevant international examples, that government should consider?
24. Are there wider regulatory, governance, ownership or delivery reforms that government should consider to support a fair, affordable and orderly transition of the gas network?

Operational costs

25. As the number of gas consumers declines, are there risks that shorter-term operational costs could also raise affordability concerns?
26. What evidence or experience can you share on how these costs might be managed fairly and sustainably?

Recovery of future disconnection costs

Future volumes, costs and evidence gaps

27. What evidence do you have on current and future disconnection volumes, costs and cost drivers?
28. What factors are likely to have the greatest influence on future disconnection costs?

Affordability and fairness

29. What factors should be considered when assessing how disconnection costs should be allocated and recovered?
30. To what extent should disconnection costs be paid by consumers who disconnect and by consumers who remain connected?
31. What impacts could different approaches have on affordability, fairness and consumer outcomes?

Effective and orderly transition

32. How could different approaches to disconnections affect consumer decisions to adopt low-carbon heating or to complete a physical disconnection?
33. Are there risks that future approaches could create unintended incentives or barriers?
34. What impact could different approaches to disconnection have on the pace of the transition to low-carbon heating?

Innovation, delivery and implementation

- 35. What opportunities exist to reduce future disconnection costs?**
- 36. What role could innovation, operational improvements and coordinated delivery models or area-based approaches play in reducing disconnection costs?**
- 37. What barriers, including regulatory, commercial or operational barriers, limit opportunities to reduce gas disconnection costs and manage the transition of the gas network efficiently? What changes could help address them?**
- 38. Should arrangements differ between GDNs and IGTs?**

Managing uncertainty

- 39. How should future arrangements account for uncertainty regarding disconnection volumes and costs?**
- 40. What degree of flexibility might be required from future arrangements over time, and how could that flexibility be incorporated into future frameworks?**

Final considerations

- 41. Is there any additional evidence, analysis or perspective you would like to share, including views on whether the principles or approaches set out in this Call for Evidence should be revised or expanded?**

Next steps

While network investment recovery and disconnection cost recovery are distinct challenges, they both arise from the same future structural change: a declining gas user base. The government will therefore consider evidence across the two strands together, while recognising that different policy or regulatory responses may ultimately be appropriate.

This Call for Evidence will inform future government consideration of whether, when and how changes may be needed to gas network investment recovery and disconnection cost recovery. The government will consider this evidence alongside ongoing work with Ofgem and wider engagement on the gas system in transition. Any subsequent policy development may proceed at different rates for the two strands and may involve further consultation.

This publication is available from: <https://www.gov.uk/government/calls-for-evidence/gas-system-in-transition-recovery-of-gas-network-costs-during-the-transition>

Any enquiries regarding this publication should be sent to us at:
gasnetworks@energysecurity.gov.uk

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