This document is classified as **WHITE**.

Information is for public, unrestricted dissemination and publication.

NON-CONFIDENTIAL CONSOLIDATED CONSULTATION RESPONSES

CCS002 – MODIFICATION PANEL CHAIRPERSON EXPENSE REIMBURSEMENT

On 18 August the Code Secretary issued a consultation to industry to seek feedback on the Modification Report for CCS002.

The purpose of this document is to consolidate the responses and for the Code Secretary to answer any questions raised within those responses.

DOCUMENT VERSION	1.0
RESPONSE TYPE	Non-Confidential
DATE ISSUED	01/10/2025
LEAD ANALYST	Ben Giblin

DATE CONSULTATION ISSUED	18/08/2025
RESPONSE DEADLINE	08/09/2025 (extended to 26/09/2025)

Question 1:	Please state whether you are in support of this Modification or if there are any issues that you believe should be considered	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	LBCCS is generally supportive. The proposal is consistent with the current Code framework. However, we do not understand the intention of the amendments to paragraph 7.20 in the proposed legal text. We believe that, and concur with, the principle proposed is that the Chairperson should not have a casting vote in mattes where he/she is conflicted but we do not understand how the proposed legal text achieves this.	Thank you for this comment. An amendment has been made so that the legal text reflects the wording found in the Red Line Proposal on the website.
Net Zero North Sea Storage Limited (T&SCo)	As the proposer of the modification I support the need for there to be a mechanisms for T&SCos to fund reasonable costs and expenses incurred by the Panel Chairperson. This will enable a wider range of candidates to be considered for appointment as the panel chair. The proposal itself does not create any additional processes, with the budget and expense management incorporated into the existing processes for the Secretary, and so maintains an efficient execution of the governance obligations under Section B of the Code.	Noted

Question 2:	How would implementation of this modification impact the relevant objectives?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	Positive impact by facilitating the appointment of a permanent Chairperson	-
Net Zero North Sea Storage Limited (T&SCo)	This will facilitate a more effective discharge of the T&SCo's obligations under the Network Code and their Licences for the timely appointment of a Panel Chairperson.	-

Question 3:	What development and ongoing costs would you face if this modification was implemented?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	Sharing the costs of the Chairperson	-
Net Zero North Sea Storage Limited (T&SCo)	There would be a minor increase in costs for T&SCos associated with paying for incurred costs and expenses by the Panel Chair. These should be significantly less than the costs associated with the Secretary.	-

Question 4:	What future impacts could this modification have on Parties to this Network Code?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**

Liverpool Bay CCS Limited (T&SCo)	Limited impact. Albeit there will be clarity on cost allocation and responsibility.	-
Net Zero North Sea Storage Limited (T&SCo)	Limited impact to users. Impact to T&SCo is limited to the minor additional costs incurred.	-

Question 5:	What lead time would you wish to see prior to this modification being implemented, and why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	This should be implemented quickly and ideally in less than one month to facilitate the appointment of a permanent Chairperson	-
Net Zero North Sea Storage Limited (T&SCo)	I would support this being implemented as quickly as possible to support the appointment of the independent Panel Chairperson in October.	-

Question 6:	Are you satisfied that the legal text will deliver the intent of the modification?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	Generally, yes, although we have concerns with the amendments to 7.20 as highlighted above	See comments above under Q1
Net Zero North Sea Storage Limited (T&SCo)	Yes – this is a pragmatic approach to incorporate the handling of the chairperson's costs and expenses under the existing governance framework.	-

Question 7:	Do you agree with the Modification Panel's determination with respect to whether or not this should be a self-governance modification?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	Yes – we believe this meets the Self-Governance criteria	-
Net Zero North Sea Storage Limited (T&SCo)	Yes, the scope is beyond what would be appropriate for a self-governance modification.	-

Question 8:	Is there anything further you wish to be taken into account?	
RESPONDENT DETAILS	**RESPONSE**	**CODE SECRETARY COMMENTS**
Liverpool Bay CCS Limited (T&SCo)	No	-
Net Zero North Sea Storage Limited (T&SCo)	n/a	-