Code Modification Forum

Wednesday, 4th of September 2024

Virtual Meeting

Time: 10:30

No.	Item	Duration (minutes)	Time
1.	*Review of Minutes from last meeting*	5	10:30 - 10:35
2.	*Review of Action Items from last meeting*	5	10:35 - 10:40
3.	*GNI Scheduled Maintenance Update*	5	10:40 - 10:45
4.	*Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network*	10	10:45 - 10:55
5.	*Code Modification Proposal A112 - Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing*	5	10:55 - 11:00
6.	*Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points* - *GB Gas Quality Update*	15	11:00 - 11:15
7.	*Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,000kWh as LDMs*	5	11:15 - 11:20
8.	*Code Modification Proposal A115 - Removal of Tolerances at RNG Entry Points*	5	11:20 - 11:25
9.	*Status of Code Modification Proposals*	5	11:25 - 11:30
10.	*Gas and Electricity interaction*	10	11:30 - 11:40
11.	*Presentation on Business Rules for CGI and RNG Entry Points*	30	11:40 - 12:10
12.	*PAYG System Replacement CMF Roadmap*	15	12:10 - 12:25
13.	*AOB Items/ Next Meeting / Close of the CMF*	10	12:25 - 12:35

Microsoft Teams meeting

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Code Modification Forum

Gas Networks Ireland

Tuesday, 4 September 2024 – Virtual Meeting

Agenda

1. Review of Minutes from last meeting
2. Review of Open Actions
3. GNI Scheduled Maintenance Update
   - Update on NROs
4. Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network
5. Code Modification Proposal A112 - Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing
6. Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points
   - GB Gas Quality Update
7. Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,000kWh as LDMs
8. Code Modification Proposal A115 - Removal of Tolerances at RNG Entry Points
9. Status of Code Modification Proposals
10. Gas and Electricity Interaction
11. Presentation on Business Rules for CGI and RNG Entry Points
12. PAYG System replacement CMF Roadmap
13. AOB Items/Next Meeting

1. Review of minutes from last meeting

- Updated Minutes of CMF meeting of 13 June were issued on 17 July.

2. Review of Open Actions

Gas Networks Ireland

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C572	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/03/2019	Ongoing
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/ CRU	25/03/2020	Ongoing
C587	Transporter to commence review of the Emergency Section of the code of Operations and provide an update at the next CMF	Transporter	18/10/2023	Ongoing

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C592	Transporter to engage with the Regulator about upcoming planned works	Transporter	13/06/2024	Complete
C593	EAI to share a notice to their members about whether they are in favour of GNI developing a system which shows gas quality on the interconnectors.	EAI	13/06/2024	Ongoing
C594	Transporter to engage with the EAI concerns about Dispatch Signals & Gas System Constraints in Peak Demand	Transporter	13/06/2024	Complete
C595	Transporter to engage with EirGrid to discuss dispatch signals & gas system constraints in peak demand to ensure sustainable gas and power interaction.	Transporter	13/06/2024	Complete

3. Maintenance Days

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3. 2023/2024 Maintenance Days

- GNI does not plan to undertake any maintenance activities during the gas year 2023/24 which will interfere with gas flows.

- All maintenance activities on GNI infrastructure/equipment relation to the Bellanaboy entry point will be co-ordinated with planned maintenance shutdowns by the Corrib operator.

Brighouse Bay Station Splitting Project Update

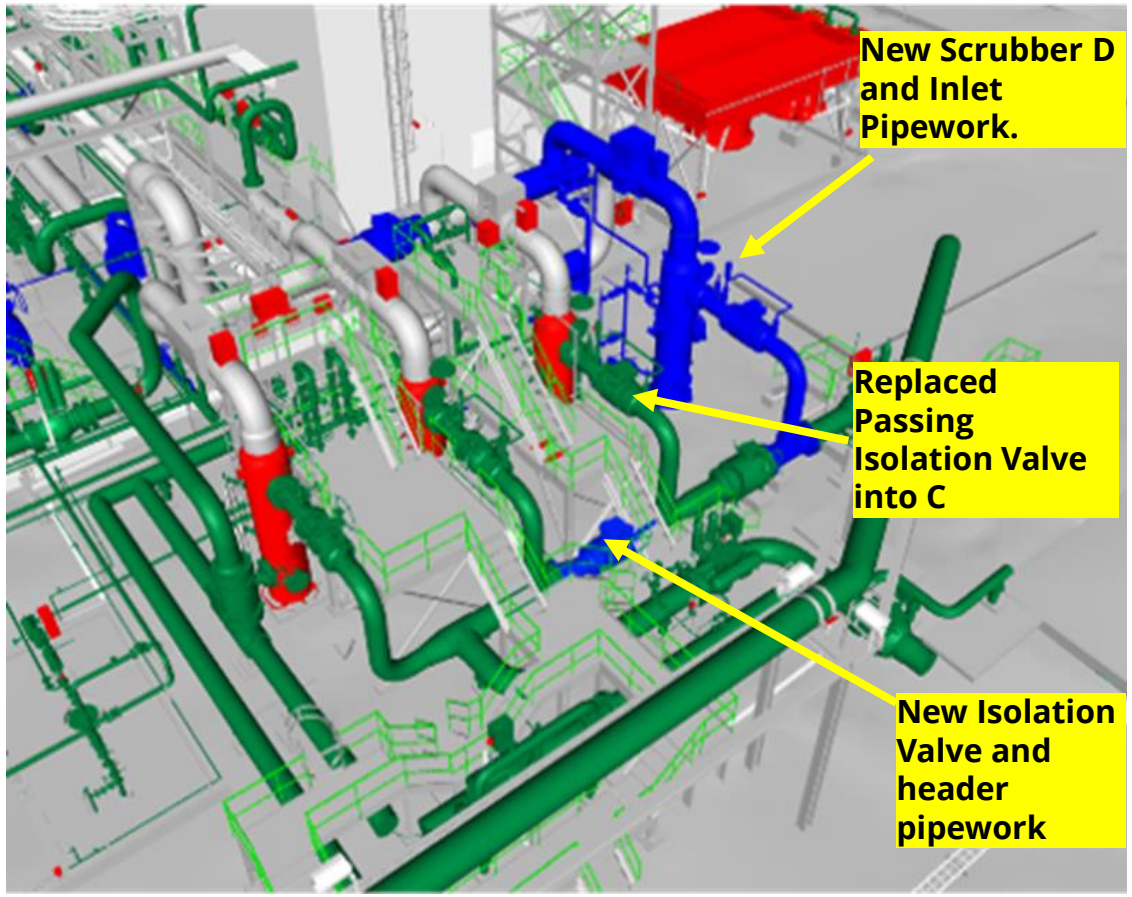
Gas Networks Ireland

Project Update

- Status:
  - 2 NROs on inlet and outlet header to scrubbers completed within time with all planned works completed;
  - Thanks for assistance with nominations at the time.
- Next steps:
  - Ancillary works (e.g. air line and vent line connections) in progress over coming weeks ahead of new Scrubber D being commissioned w/c 16th September. There are short duration station outages where minor works take place planned with Grid Control where your early nominations are not required.
  - W/c 23rd September a new isolation valve will be installed on pipe line into Hall 1. Notification for assistance on the particular days will be issued 1-2 days in advance;
    - Nominations as early and realistic as possible on the day. This assists with knowledge of available time for Grid Control and Operations on site;
    - Communications will be issued if there is an issue during an outage i.e. if during an outage there is a failure of a component or a leak path which may need immediate repair but outcome may be unable to make up gap in nominations for gas day.

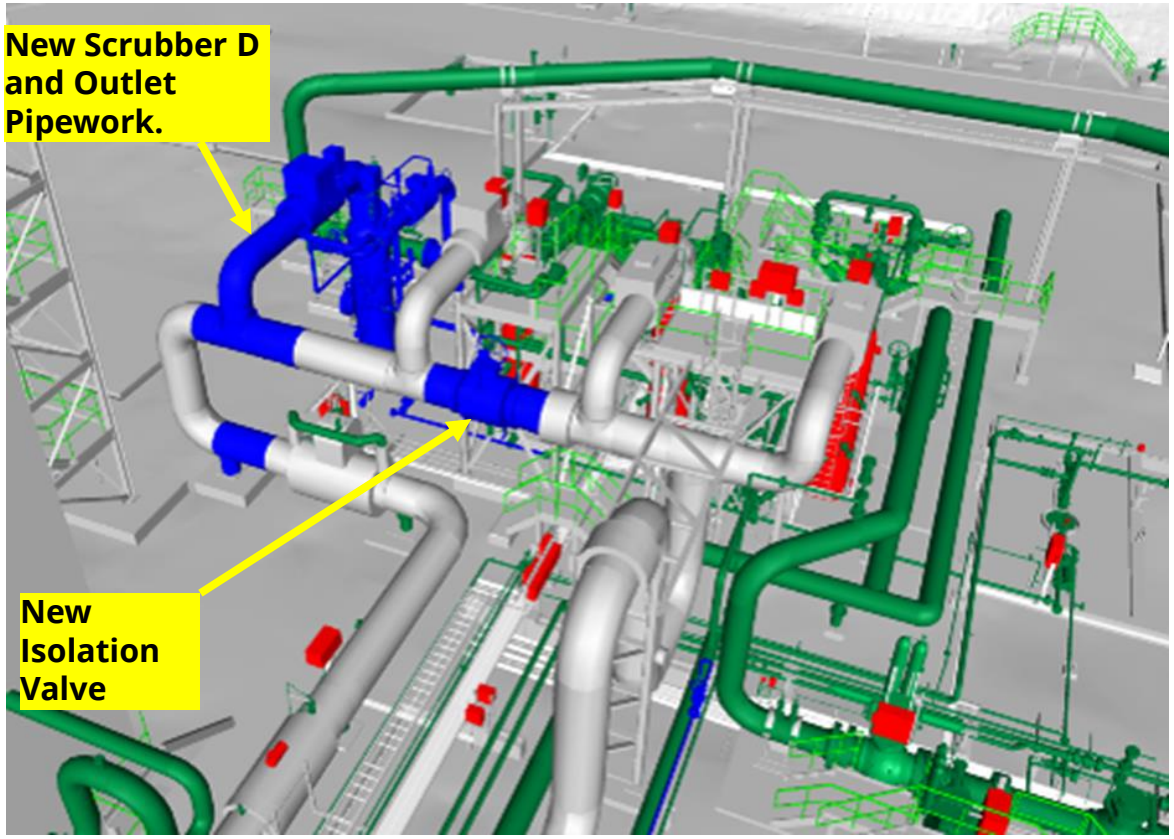
Inlet Scrubber Manifold NRO 8th to 9th August

- Additional Scrubber D Inlet Manifold

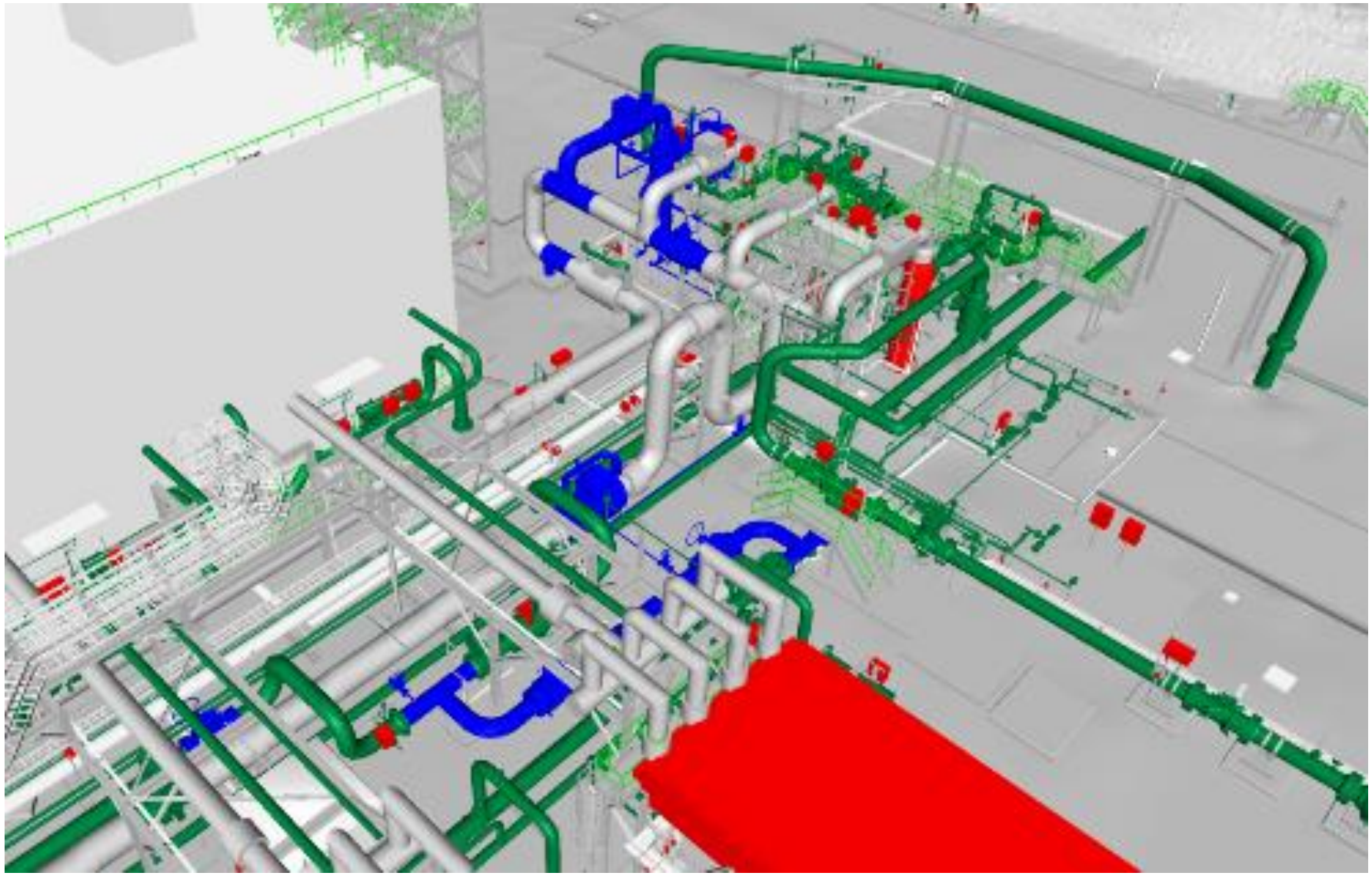


Outlet Manifold NRO 21st to 22nd August.

- Installation of Outlet Manifold



W/C 23rd September Works on Hall 1 Isolation Valve



4. Code Modification Proposal A111

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Amendment to Code of Operations to increase oxygen limit for biomethane entry points on transmission network

4. Code Modification Proposal A111 - Increasing the oxygen limit for biomethane entry points on the transmission network

Issued and circulated on 15 June 2023

Documents issued with Code Modification Proposal can be found here.

- Explanatory Memorandum
- Proposed Legal Text
- Penspen Report
- Report Analysis Summary

Update

- Upper limit for oxygen is 0.2% for natural gas in Transmission and Distribution Networks
- RNG injected into the distribution network has upper limit of 1%
- Industry review date extended to 1 June 2024.
- Industry submissions to date can be accessed on slides 42 and 43 on the following Slide Deck.
- **Next Steps:** The industry review will continue in tandem with the CRU review until the 1st of October.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A111	Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network	Industry/CRU Review	To allow time for OEMs to finish their studies.	01/10/2024	CMF Proposal Report to issue

5. Code Modification Proposal A112

Gas Networks Ireland

Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing

5. Code Modification Proposal A112 – Supplier of Last Resort

Four SoLR documents previously issued at Code Mod Forum can be found here.

The combined proposals outline how GNI and the SoLR will manage an event to take account of:

- New short-term capacity products in the DM/LDM market;
- Amended SoLR invoicing and Disbursement billing processes in the month of the SoLR event;
- Permit SoLR CoS/EUA at SoLR Affected DM & LDM Offtakes at the end of any month of the SoLR event; and
- Recent experience in NDM SoLR events.

Next Steps: GNI continues to engage with BGE on their SoLR comments around the Failed Supplier obligations, Entry arrangements, , "SoLR affected Shippers" and GNI reporting.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A112	Amendment to Supplier of Last Resort provisions	Industry Review	Discussions are ongoing with existing SOLR.	TBC	CMF Proposal Report to issue

6. Code Modification Proposal A113

Gas Networks Ireland

Amendment to Code of Operations to amend gas quality requirements at Entry Points

6. Code Modification Proposal A113 - Amending gas quality requirements at Entry Points

- The Health and Safety Executive (HSE) in the UK has recently approved changes to the Great Britain (GB) gas quality specification in the Gas Safety Management Regulations (GSMR). The relevant changes approved by HSE include the reduction in the lower WOBBE limit to 46.5 MJ/m3 and the replacement of the Incomplete Combustion Factor and Soot Index with the relevant density limit of ≤0.7. The replacement of ICF and SI with a RD limit has become effective in the UK as of 6 April 2023.
- GNI has reviewed the implications of the planned changes to the GSMR specification and concluded it would be best to realign the RoI gas quality specification in the Code with the new GSMR specification.
- The implementation of the lower WOBBE limit has been deferred until 6th April 2025 (to allow sufficient time for industry to prepare for the change).
- GNI published relevant Supporting Documentation on the 11th of August 2023.
- **Next Steps:** The industry review will continue in tandem with the CRU review until the 1st of October.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A113	Amendment to Gas Quality Standards at Entry Points	Industry/CRU Review	To allow time for OEMs to finish their studies.	01/10/2024	CMF Proposal Report to issue

Great Britain (GB) Gas Quality Update

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Update on GNI Code Modifications

- Held a number of meetings with CRU on Safety Case submission to amend gas quality specification and reduce lower WOBBE limit
  - Provided extensive clarifications to the CRU queries
  - Main focus of discussion is on procedural issues associated with updating Safety Case, Natural Gas Emergency Plan (NGEP) etc

7. Code Modification Proposal A114

Gas Networks Ireland

Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,000 kWh as LDMs

7. Code Modification Proposal A114 – Classifying Gas Points with a design MHQ of 100,000 kWh as LDMs

- The Proposal is to classify all Gas Points that have a design maximum hourly quantity of not less than 100,000 kWh classified as LDM pursuant to the Code of Operations irrespective of the Annual Quantity associated for such Gas Points.
- **Rationale for the Proposal**
- Shippers (including Generation Units subject to Central Dispatch) will be able to view hourly data on GTMS and be able to book capacity as required , leading to better trading decisions and enabling them meeting obligations under Part D of the Code of Operations to submit accurate information with respect to Nominations
- GNI system oversight and control is enhanced when receiving accurate nominations with a greatly reduced likelihood of experiencing unexpected substantial gas withdrawals.
- Industry Review closed on 31 January with one submission which supported the proposal.
- Transporter has submitted CMF Proposal Report to CRU with a response to CRU query in relation to prospective tariff/cost implications resulting from the modification.
- Instruction & Rationale issued on the 10th of July with modification coming into immediate effect.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A114	Re-classify Gas Points with a design MHQ of 100,000KWh as LDM	Instruction & Rationale Issued		Completed	NA

8. Code Modification Proposal A115

Gas Networks Ireland

Removal of Tolerances at RNG Entry Points

8. Code Modification Proposal A115 – Removal of Tolerances at RNG Entry Points

- The Proposal is to Remove Tolerances at RNG Entry Points .
- As outlined in the most recent ENTSOG Implementation Monitoring Report, Ireland has not complied with the obligation in Article 45 of the Balancing Network Code to **discontinue the use of interim measures (which include balancing tolerances) within five years from the date of entry into force of the Code, i.e. 16 April 2019, due to the remaining outstanding tolerance at RNG Entry Points.**
- The rationale for retaining the RNG Entry Point tolerance was to support the development of renewable gas injection. On reviewing this relief, GNI is of the view that its retention is no longer justifiable as it does not provide any benefit to RNG producers and is of small benefit to Shippers granting them a more favorable cashout price.
- This is a matter of compliance and practical implementation is straight forward. Amending Part E (Balancing/Shrinkage) of the Code of Operations to remove tolerances from RNG Entry Points will ensure full compliance with the Balancing Network Code.
- GNI issued the proposal along with supporting documentation on the 31st of July.
- **Next Steps:** Agreement of Industry Review timelines – GNI now proposes an industry review period of four weeks to the 2nd of October 2024.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A115	Removal of Tolerances at RNG Entry Point	Presentation to the CRU	To allow the Transporter to formally present the modification to industry.	TBC	Industry Review

9. Status of Code Modification Proposals

Gas Networks Ireland

9. Status of Code Modification Proposals

ID	Title	Status	Reason for Status	Status End Date	Next Step
A099	CNG Supply Point Capacity Setting	In abeyance	Awaiting the development of the CNG market and sufficient data to inform the next steps.	TBC	NA
A111	Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network	Industry/CRU Review	To allow time for OEMs to finish their studies.	01/10/2024	CMF Proposal Report to issue
A112	Amendment to Supplier of Last Resort provisions	Industry Review	Discussions are ongoing with existing SOLR.	TBC	CMF Proposal Report to issue
A113	Amendment to Gas Quality Standards at Entry Points	Industry/CRU Review	To allow time for OEMs to finish their studies.	01/10/2024	CMF Proposal Report to issue
A114	Re-classify Gas Points with a design MHQ of 100,000KWh as LDM	Instruction & Rationale Issued		Completed	NA
A115	Removal of Tolerances at RNG Entry Point	Presentation to the CRU	To allow the Transporter to formally present the proposal to industry.	TBC	Industry Review

10. Gas and Electricity interaction

Gas Networks Ireland

11. Presentation on Business Rules for CGI and RNG Entry Points

Gas Networks Ireland

Stephen O’Riordan – Wholesale Market Manager

Mitchelstown CGI overview

- In Phase 1 of the Mitchelstown CGI Project, **two out of eight decanting bays will be built**, and the focus will be on enabling the initial users of the facility to get up and running as soon as possible.
- Phase 1 of the Project will allow for up to **175 GWh** of biomethane to be injected into the gas network annually.
- The CGI facility will be modular in nature, and further decanting bays will be added in response to Producer requirements – once all eight decanting bays are in operation the facility will have a capacity of **700 GWh pa**.
- As set out in the CRU's PC5 decision, **70% of the capital cost of the CGI will go on the Regulated Asset Base** and these costs will be recovered through the gas tariff.
- The balance of the capital costs (30%) will be recovered by a **charge to gas producers** wishing to use the CGI facility.

General Principles for CGI Business Rules

P1 **Simplicity:** the objective will be to introduce simple straight forward rules which will be applied to all RNG Entry Points to provide clarity for RNG Producers and Shippers.

P2 **Consistency:** All RNG Entry Points including RNG sub-Entry Points at a CGI subject to the same provisions with respect to the Code, with consistent rules applied re: shipper arrangements, metering and other processes.

P3 **Alignment:** Align with the current provisions and principles established in the Code of Operations and minimise the required changes to the Code.

P4 **Non-discrimination:** Notwithstanding that GNI is offering services to producers, outside of the scope of its activities as TSO, an obligation of non-discrimination and avoidance of anti-competitive behaviour applies.

P5 **Accessible:** It is envisaged that the Business Rules presented here would be consistently applied to all similar CGI Facilities.

GNI role and services provided

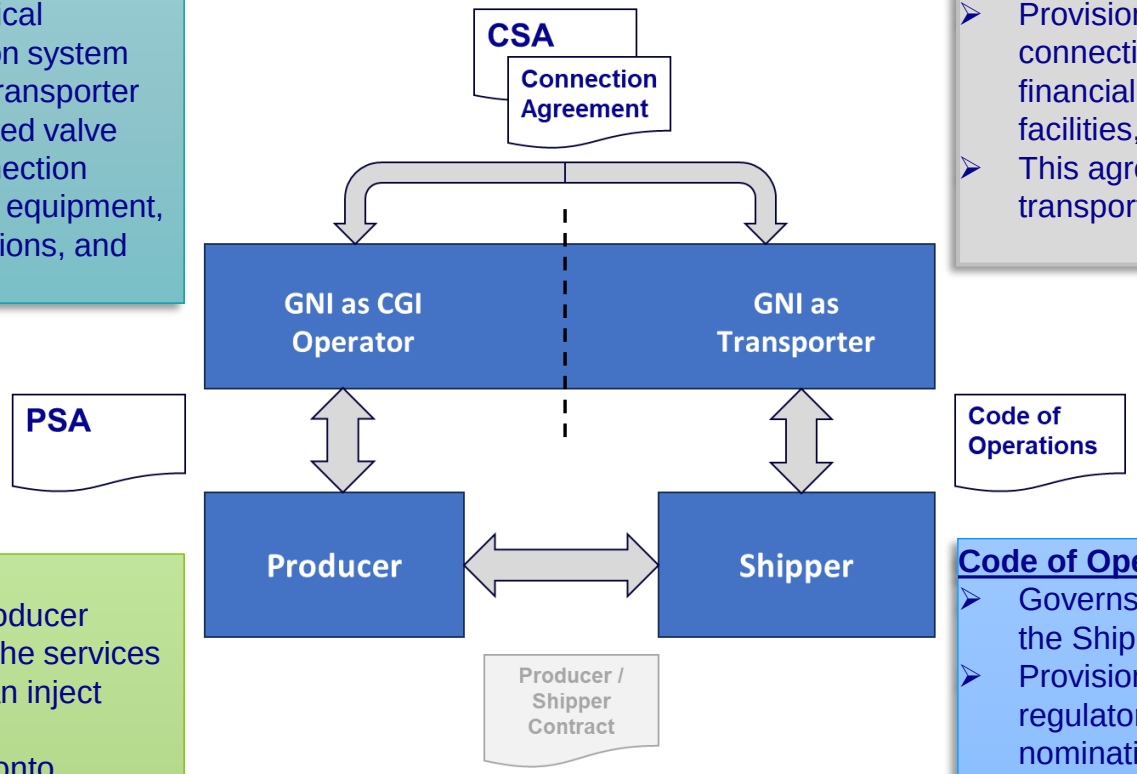
- GNI will fulfil two roles with respect to the Mitchelstown CGI facility – GNI will be both the **CGI Facility Operator**, and its current and primary role as **Transporter** pursuant to the Code of Operations.
- The roles of CGI Facility Operator is equivalent to the role of **Delivery Facility Operator** as defined in previous **Connected Systems Agreements (CSA)**.
- In order to formalise and distinguish roles, a CSA between GNI as the CGI Facility Operator and GNI as the Transporter will be put in place to govern the key interactions and to adhere to **Principle no.5**, such that any third-party wishing to develop a CGI facility will be required to enter into similar arrangements with GNI in its role as the Transporter.

GNI as CGI Facility Operator
➢ Operation of the CGI facility
➢ Request that Transporter to configure RNG sub-Entry Points
➢ Producer registration at the CGI
➢ Application of Producer charges for usage of CGI facility
➢ Ensure compliance with CGI Local Operating Procedures (LOPs)
➢ Provision of scheduled decanting slots to Producers using CGI
➢ Allowing Producers / Hauliers to access the site
➢ Providing other services to Producers as may be required

GNI as Transporter
➢ Commissioning of the Connected Systems Point
➢ Configuration of Transportation System Entry Points
➢ Shipper Registration
➢ Recovering revenue on an annual basis through the tariff
➢ Transportation system capacity arrangements
➢ Nomination / allocation arrangements
➢ Gas quality measurement
➢ Pressure reduction
➢ Odorant addition
➢ Constrain the CGI if required (e.g. in an emergency)
➢ Metering and meter data cleansing process
➢ Monthly Invoicing of Transportation charges

Contractual Framework – initial proposal

Connected System Agreement (CSA):
- Between GNI as CGI Operator and GNI as Transporter
- Deals with operational matters at the physical connection point between the transportation system and a connected system – regulates the Transporter control equipment and the remotely operated valve
- Provisions to include, identification of connection point, gas flows, gas quality specs, control equipment, monitoring provisions, technical interpretations, and operating procedures etc.



Connections Agreement (CA):
- Between GNI as Transporter and GNI as CGI Operator
- Provisions will relate to construction of the physical connection point, commissioning, project programme, financial security, committed gas flows, ownership of facilities, and various other legal provisions
- This agreement "falls away" once the connection to the transportation system has been made.

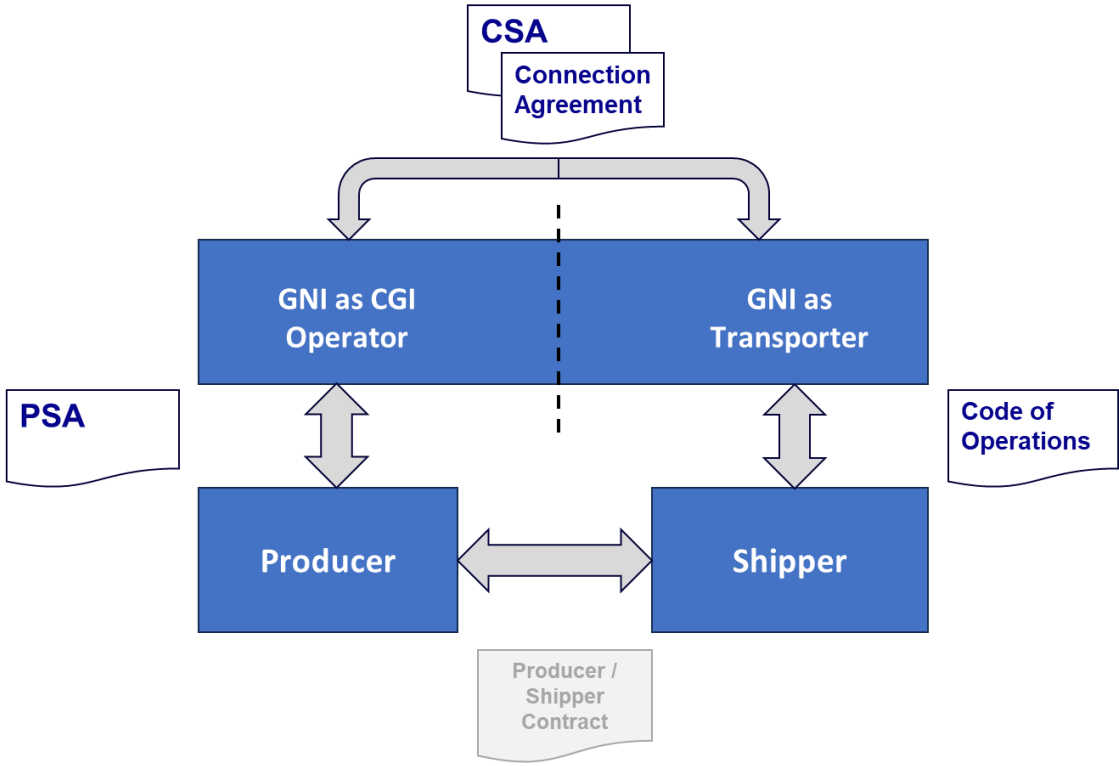
Producers Services Agreement:
- Between GNI as CGI Operator and the Producer
- Addresses the Producers obligations and the services GNI provides – states volume Producer can inject
- Producer obligations include adherence to regulations, contracted personnel coming onto site, quality of gas delivered, out of spec gas, feedstock criteria, injection scheduling, operating procedures.
- GNI services include providing access to decanting station, gas quality analysis, pressure reduction, odorant addition, data communication.

Code of Operations:
- Governs relationship between GNI as Transporter and the Shippers on the Transportation System
- Provisions in the Code include general principles, regulatory compliance, capacity arrangements, nominations & allocation arrangements, balancing, Shipper registration, metering and gas specification etc.
- If modification proposals to the Code are required to support the CGI arrangements, these will be raised by GNI and progressed through the CMF

Contractual Framework – rationale

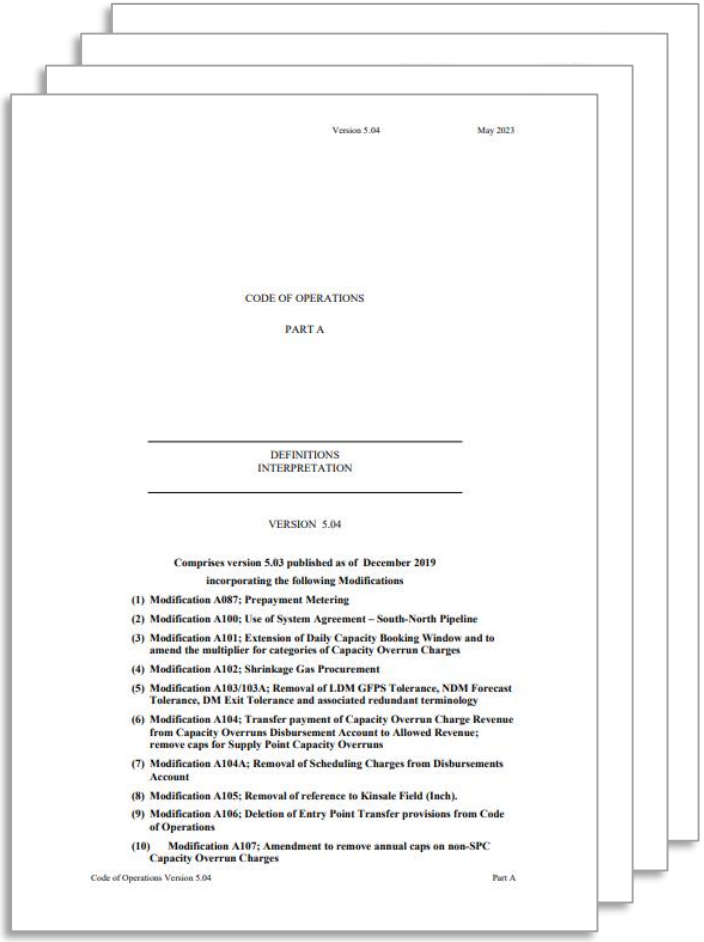
Why does this model make sense?

- This model is broadly available to third party developers wishing the to develop a CGI facility.
- Clear delineation between GNI's role as Transporter and GNI's role as the CGI operator – keeps the complexities with managing the station including decanting schedules away from the Code.
- Simplifies the required Code provisions (and modifications), particularly those in relation to configuration of Entry Points onto the Transportation System.
- Allows GNI as the CGI operator to contract directly with Producers via the PSA – recognises that GNI as the Transporter can only contract with Shippers via the Code and with Delivery Facility Operators via a CSA.
- Aligned with best practices observed elsewhere.



Key concepts to be incorporated into the Code of Operations

- As per the Code, only licensed gas shippers which have entered into a Framework Agreement with the Transporter such that they are bound by the terms of the Code of Operations, may tender gas for delivery to the Transportations system – **RNG producers will thus have to secure the services of a gas shipper**.
- The CGI will be configured as a series of **RNG sub-Entry Points** with each producer assigned its own RNG sub-Entry Point.
- RNG sub-Entry Points will be configured as set out in the **relevant CSA** as is currently specified in the Code.
- Only **one shipper** will be registered at each RNG sub-Entry Point a given time – it is proposed that this provision will be extended to all RNG Entry Points under the Code.
- Producers will be allowed to **change shipper at the start of each month**, if they so choose – either on expiry of capacity bookings or by way of capacity assignment.
- A shipper at an RNG sub-Entry Point will **book capacity** in accordance with the Part C of the Code to allow the shipper deliver gas to the Transportation System;
- **Nominations and allocations** will be as prescribed in the Code currently and we anticipate minor changes only – there will be a single prevailing nomination / allocation for each of RNG sub-Entry Point.


Version 5.04 May 2023

CODE OF OPERATIONS

PART A

DEFINITIONS
INTERPRETATION

VERSION 5.04

Comprises version 5.03 published as of December 2019
incorporating the following Modifications

(1) Modification A087; Prepayment Metering
(2) Modification A100; Use of System Agreement – South-North Pipeline
(3) Modification A101; Extension of Daily Capacity Booking Window and to amend the multiplier for categories of Capacity Overrun Charges
(4) Modification A102; Shrinkage Gas Procurement
(5) Modification A103/103A; Removal of LDM GFPS Tolerance, NDM Forecast Tolerance, DM Exit Tolerance and associated redundant terminology
(6) Modification A104; Transfer payment of Capacity Overrun Charge Revenue from Capacity Overruns Disbursement Account to Allowed Revenue; remove caps for Supply Point Capacity Overruns
(7) Modification A104A; Removal of Scheduling Charges from Disbursements Account
(8) Modification A105; Removal of reference to Kinsale Field (Inch).
(9) Modification A106; Deletion of Entry Point Transfer provisions from Code of Operations
(10) Modification A107; Amendment to remove annual caps on non-SPC Capacity Overrun Charges

Code of Operations Version 5.04 Part A

What is a CGI in the context of the Code of Operations?

Definition of Central Grid Injection (CGI)

- A CGI will be defined as *"a class of Delivery Facility which facilitates offsite Producers delivering gas into the gas network at a number of RNG sub-Entry Points".*
- A CGI is distinguished from a Direct Connection, which is a facility with one physical RNG Entry Point, which is typically connected directly to the production site, however a virtual pipeline model where gas is trucked by a Producer to an RNG Entry Point for their use only, would also constitute a Direct Connection.
- A facility which is defined as a CGI will have additional requirements in terms of the data it provides to the Transporter to allow for accurate allocations among the Shippers registered at each of the RNG sub-Entry Points at the facility.

Why does this make sense?

- By configuring a separate RNG sub-Entry Point for each Producer, we can apply common rules for all RNG Entry Points, providing operational simplicity and demonstrating a non-discriminatory approach.
- Referred to as RNG sub-Entry Points as referring to these as RNG Entry Points may have a particular meaning in the safety context and require individual safety cases for each of RNG Entry Point at the CGI.

Code of Operations impacts and analysis:
The term RNG Entry Point is already defined in Part A of the Code. Further definitions will need to be added to Part A for a **Central Grid Injection Facility (CGI)** and for the **RNG sub-Entry Points** which will make up the CGI. Definitions will not be specific to any one facility and common rules will be applied to all RNG Entry Points including RNG sub-Entry Points throughout the Code.

How will RNG sub-Entry Points be set up at the CGI?

Configuration of RNG sub-Entry Points

- CGI RNG sub-Entry Points will be configured at the Mitchelstown CGI according to the contracted capacity at the CGI as initially described in the relevant Producers Service Agreement (PSA).
- The CSA will set out the procedure for configuring each RNG sub-Entry Point at the CGI and will take into account the terms of the PSA.
- RNG sub-Entry points are Entry Points assigned to each producer at the CGI – the Physical location may not always be the same, i.e. they may utilise different decanting bays from one day to the next.

Why does this make sense?

- Requires minimum changes to the Code of Operations as the section on configuration of Entry Points refers to the CSA as it is.

Code of Operations impacts and analysis:
Part F, Section 1.3.4 of the Code of Operations already establishes the procedure for configuring Entry Points onto the Transportation System and refers to the configuration of Connected Systems. The Connected Systems Agreement for the CGI will be thus leveraged to specify the arrangements for configuring RNG sub-Entry Points, as arrangements may vary from CGI to CGI depending on onsite arrangements etc.

What are the arrangements for shippers at RNG sub-Entry Points?

Producer / Shipper Arrangements at RNG Entry Points:

- The RNG producer will still need to secure the services of a gas Shipper registered at the CGI, unless they themselves are a licensed gas shipper who has entered into a Framework Agreement with GNI the Transporter and is thus bound by the Code of Operations.
- Each RNG sub-Entry Point can only have one shipper registered at a given time – producers will be free to change their registered shipper at the beginning of each month – either on expiry of capacity bookings or by way of capacity assignment.
- These arrangements will be applied to all RNG Entry Points on the Transportation System, including Direct Connections and a Code Modification proposal will be advanced to this effect.

Why does this make sense?

- Provides straightforward and consistent rules for all RNG Entry Points.
- Ensures that GNI can accurately allocate gas among shippers and avoids complexity with respect to allocation rules and resultant queries / disputes.
- Cost efficient and ease of implementation, leading to opex savings vs. multiple shippers at each RNG sub-Entry Point, and in line with best practice elsewhere GB / Europe.

Code of Operations impacts and analysis:
Part F of the Code of Operations contains provisions in relation to registration and the configuration of Entry Points which will need to be updated. The one shipper per RNG sub-Entry Point rules will be given effect via updates to Part C, regarding the booking of capacity at RNG Entry Points, and by way of updates to Part I regarding Assignment provisions (to allow the producer to change shipper).

How will metering work at a CGI?

Metering at CGI RNG sub-Entry Points

- Each of the decanting bays at the CGI will have its own physical fiscal meter;
- Each producer will be assigned its own CGI sub-Entry Metering register which picks up the opening and closing reads of the relevant physical meter – to be used for shipper allocations and billing.
- The term "**CGI sub-Entry Metering**" will be defined as "***a metering process which consists of an electronic register which holds metering information pertaining to a particular CGI RNG sub-Entry Point. The metering data will originate from a physical meter which meets all relevant technical standards***".

Why does this make sense?

- Each Producer will have its own RNG sub-Entry Point, and they could use a different decanting stations from one day to the next depending on the decanting station schedules.

Code of Operations impacts and analysis:
New definitions will need to be added to Part A of the Code to refer to CGI sub-Entry Metering, and the CSA will need to refer to metering arrangements at the Connected Systems Point. Part G, Section 3 of the Code substantially covers metering arrangements and new sections may need to be added. Section 3.9 (Meter Data Cleansing) may also be considered, and provisions included for RNG sub-Entry Points.

How will capacity be booked?

Capacity:

- By signing the PSA, the RNG producer is in effect contracting for the right to inject at that RNG sub-Entry Point for a period of at least [15 years]. The volume contracted for in the PSA will set the Technical Capacity for a given RNG sub-Entry Point on the Transportation System.
- Provisions related to capacity at RNG sub-Entry Points will be broadly the same as capacity provisions as specified in Part C, Section 7 of the Code of Operations.
- The gas shipper will be required to hold RNG sub-Entry Capacity in order to deliver gas to the Transportation System. If a Shipper registered at an RNG sub-Entry Point has not procured sufficient capacity to cover the allocated flows, the usual overrun rules and the corresponding overrun charges will apply.

Why does this make sense?

- Provides simple and straightforward rules for capacity booking and aligns with the existing provisions in Part C of the Code.

Code of Operations impacts and analysis:
Provisions related to capacity at RNG sub-Entry Points will be broadly similar to existing provisions for booking Entry Capacity as outlined in Part C , Section 3 of the Code. A new section will be added to Part I, Section 12 to cover Entry Capacity Assignments at RNG sub-Entry Points.

How will nominations and allocations work?

Nominations and allocations:

- There will be a single prevailing nomination per day at each RNG sub-Entry Point; there will be no concept of an aggregate nominations, even if a Shipper is registered at multiple RNG sub-Entry Points at the same CGI facility.
- The nominated quantities submitted can be injected at any time of the relevant gas day while respecting decanting schedules specified in the PSA.
- Entry Scheduling Charges will apply where Entry Nominations differ from the Entry Allocations outside of allowed tolerances as set out in Part E, Section 1.10 of the Code of Operations.
- Allocations will be specific to each separate RNG sub-Entry Point, even in the case where a Shipper is the registered Shipper at a number of RNG sub-Entry points at the same CGI facility.
- On a given day, if a RNG Producer has put gas into the system, this will be allocated to the registered Shipper at the relevant RNG sub-Entry Point whether the Shipper has submitted a nomination or not.

Why does this make sense?

- This is entirely consistent with the current practice and adheres to principle no. 3 [Alignment]

Code of Operations impacts and analysis:
Part D of the Code will require minimal if any intervention as we are not proposing any substantial changes – references to RNG sub-Entry Points may be included if so required, to provide clarity and completeness such that it is clear that references to Entry Points also apply to RNG sub-Entry Points.

Worked example

GNI as the Transporter and GNI as the CGI Facility Operator will establish a CSA; this will establish among other things the process for configuration of the new RNG sub-Entry Points.

Producers will enter into a PSA agreement with GNI as the CGI Facility Operator; this will specify CGI decanting capacity, related usage charges, procedures for producer registration / configuration, decanting schedules, site access and Local Operating Procedures.

Each producer will have its own RNG sub-Entry Point; GNI acting as the Transporter will configure RNG sub-Entry Points on the Transportation system – the technical capacity of the RNG sub-Entry Point will be based on the stated decanting capacity in the PSA.

Producers will need to contract with a gas shipper; only licensed gas shippers which have entered into a Framework Agreement with the Transporter and thus bound by the Code, may tender gas for delivery to the Transportation System.

Shipper must book capacity in order to be a registered Shipper at an RNG sub-Entry Point; Shippers will be required to hold sufficient capacity for each RNG sub-Entry Point in order to deliver gas to the Transportation System.

Shippers will be required to provide advanced nominations of the delivery of gas; and will be allocated gas based on metered volumes after the fact for each RNG sub-Entry Point.

A Shipper will cease to be the Registered Shipper at a RNG sub-Entry Point; on expiration of a long-term capacity booking or on Assignment of said capacity to another shipper

Code of Operations – initial impact assessment

Part A – Definitions and Interpretation:	Various new definitions may be required, e.g. Central Grid Injection Point, Producer Services Agreement, RNG sub-Entry Point, CGI sub-Entry Metering etc.
Part B – General Principles:	No impacts expected
Part C – Capacity:	New section to be added to Section 3 to cover capacity at RNG sub-Entry Points.
Part D – Nominations, Allocations and NDM Supply Point Reconciliation:	No substantial changes envisaged.
Part E – Balancing and Shrinkage:	No impacts expected
Part F – Administration:	Provisions re: configuration of RNG sub-Entry Points to be included, as will references to registration / capacity bookings at RNG sub-Entry Points.
Part G – Technical:	Arrangements related to CGI sub-Entry Metering will need to be described and application of meter data cleansing to RNG sub-Entry Points may need to be provided for.
Part H – Operations:	No substantial changes envisaged.
Part I – Legal and General:	Updates to Assignment provisions to cover assignment of capacity at RNG sub-Entry Points / RNG Entry Points to allow Producers to change shipper.

Process overview and next steps

- The Central Grid Injection and RNG Entry Point draft Business Rules were issued for industry review on the 7th of August 2024.
- The draft Business Rules have been developed to outline GNI's current view on how the Mitchelstown CGI Facility (and other similar facilities) will operate; **many of the provisions outlined will also be applicable for other RNG Entry Points**.
- GNI is now introducing the draft Business Rules at the Code Mod Forum today, 4thof September 2024 – we propose a **four-week industry Review** period to Wednesday the 2nd of October.
- Once industry review is complete the CRU review will commence – **final Business Rules will be published following approval by the CRU**.
- Prospective Code Modifications will then be advanced in line with the approved Business Rules and will include the proposed Code legal drafting amending the Code of Operations – for the avoidance of doubt, these **Code Modifications will also be presented for industry review in due course**.
- **Sections 1 through 4 of the draft Business Rules document are included to provide an overview of the CGI structure, and the general context to support discussion of the Business Rules. Sections 5 and 6 outline the Business Rules and Code Impacts and are designed to inform prospective Code Modifications; we welcome your comments on these Sections in particular**

12. PAYG System Replacement CMF Roadmap

Colm O’Duibhir – Regulatory Operations Manager

PAYG System Replacement Project

Table of Contents

- Current PAYG System
- Proposed System
- Project Timeline
- Engagement with Code Modification Forum
- Next Steps

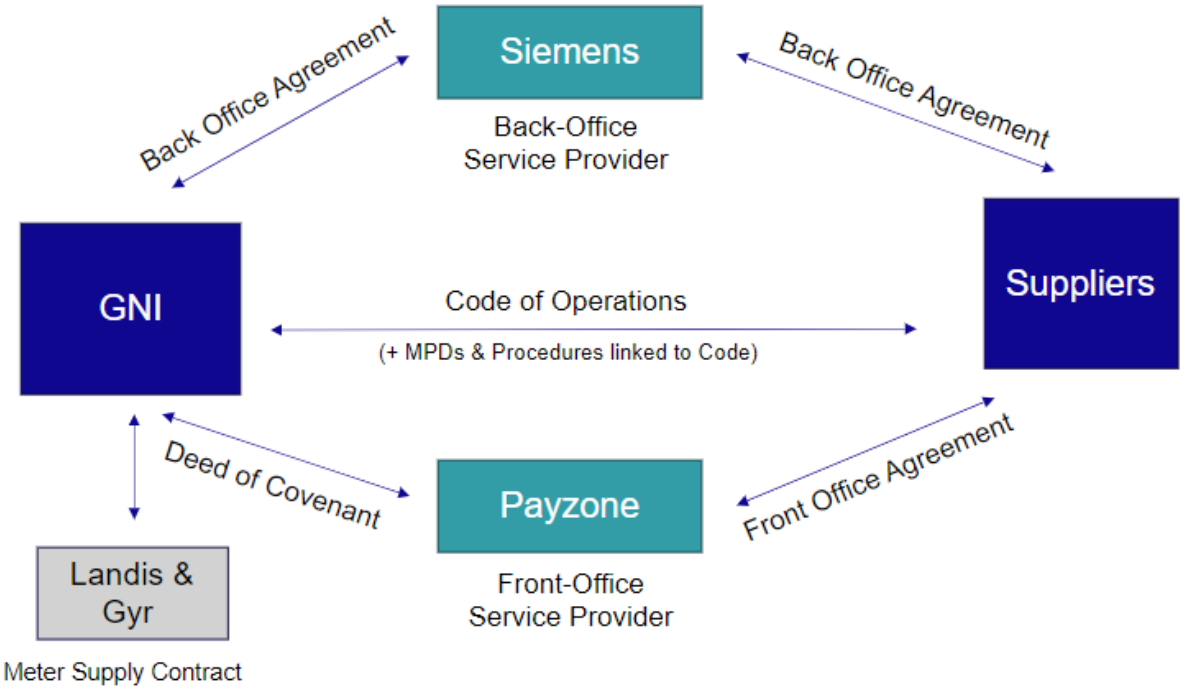
PAYG System Replacement Project

Current PAYG System

What we have now

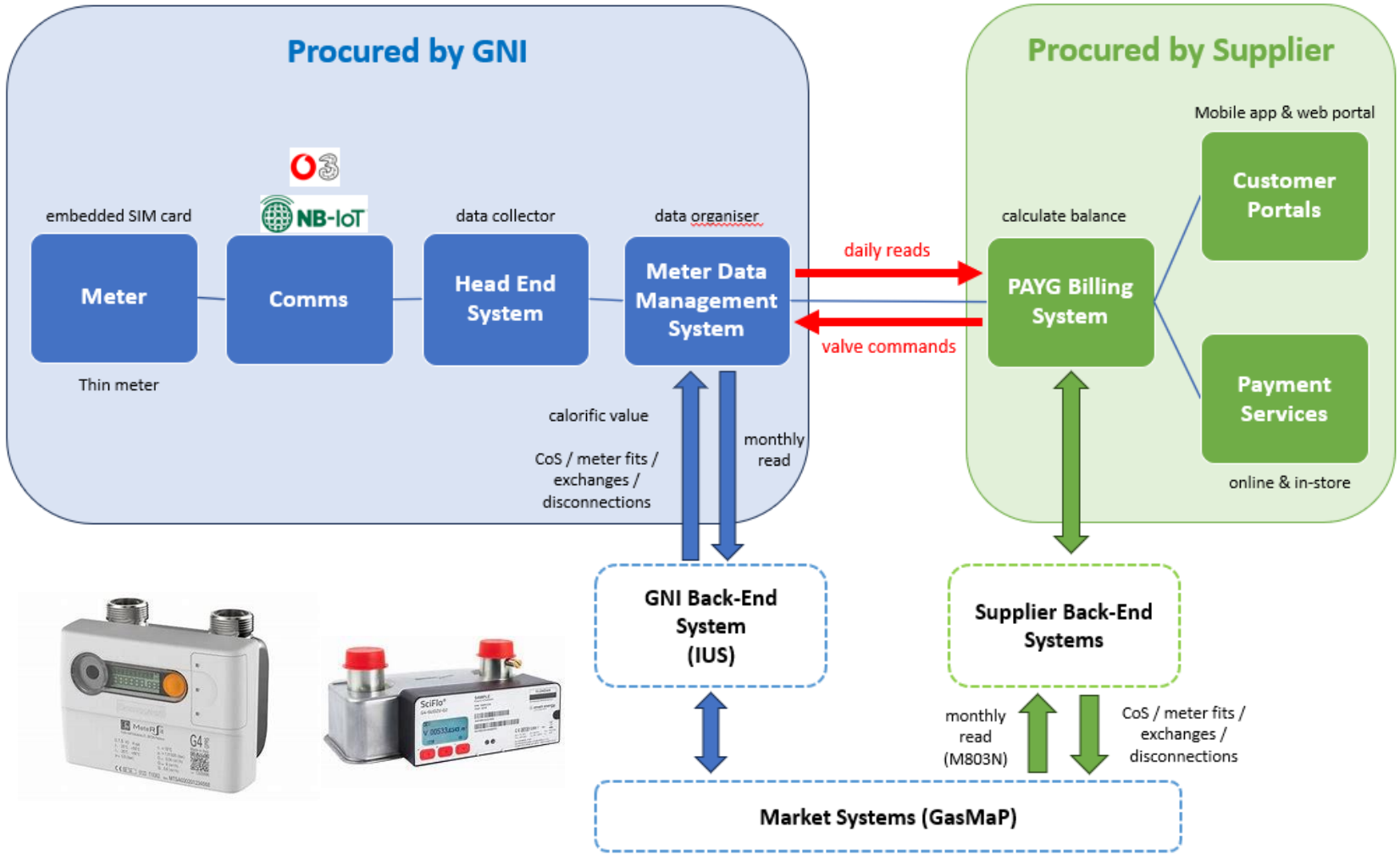
- Card based meters (113,000 PAYG meters)
  - Bring card to shop, top-up card, insert card in meter
  - Online vending not possible (problem during storms)
  - Data transferred via payment terminal in retail outlet
    - Intermittent data to GNI and gas supplier
- Dated technology
- End-of-Life - Landis & Gyr ceasing production of meterv

Contractual Framework



PAYG System Replacement Project - Overview

Proposed System



Customer Facing Features

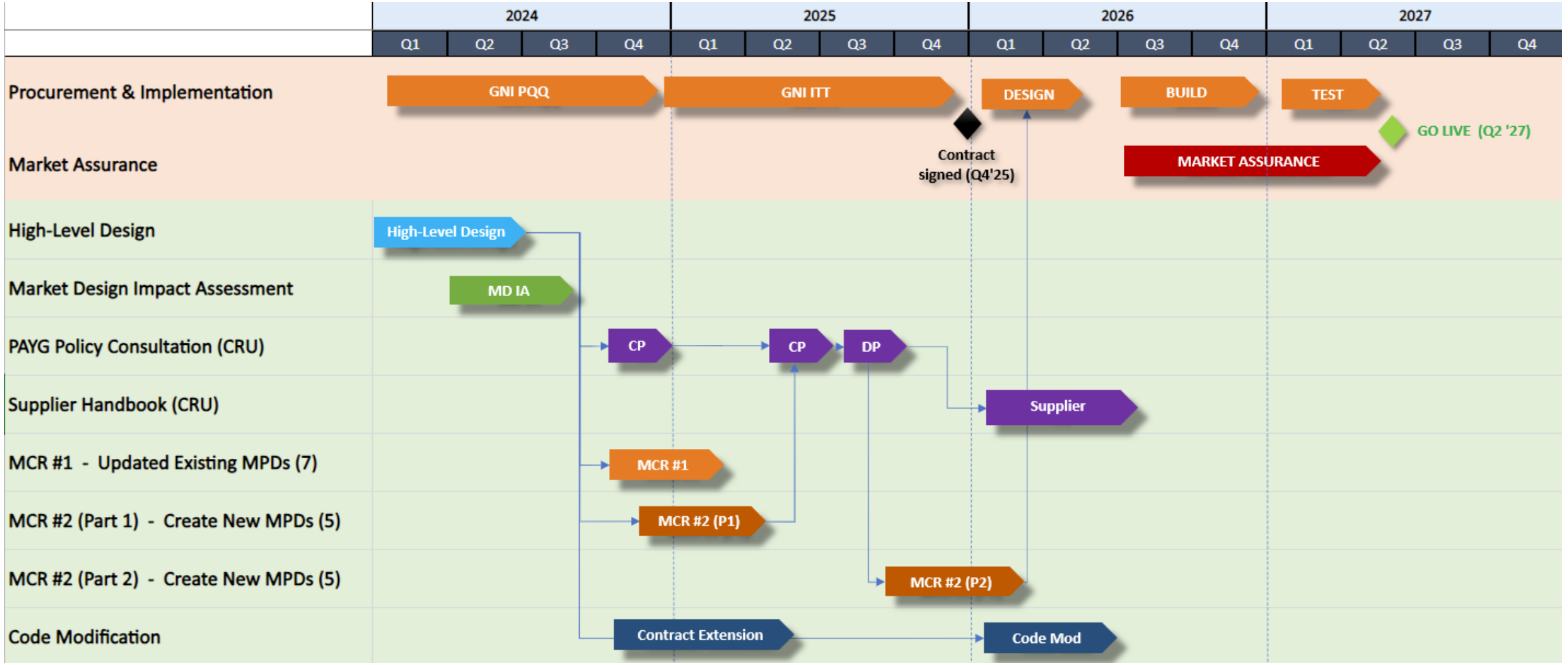
- daily meter read to gas supplier
- online top-ups + in-store top-ups
- mobile apps & web portals
- low balance reminders to your phone

Project will deliver:

- Replacement of 113k meters
- GNI: meters, NB IoT comms service, Head-End System, MDMS
- Gas Suppliers: Billing System, customer portals, payment services
- Integrations from MDMS to GNI and gas supplier systems

PAYG System Replacement Project - Overview

Project Timeline



PAYG System Replacement Project

Engagement with Code Modification Forum

Now: Extension of Current Framework:

- GNI intends to extend these agreements to cover the transition period.
- Key commercial term (i.e. the per transaction fee) will need to be renegotiated as transaction volumes fall away.

Late 2025: Modifications to implement new system:

- Introduction of provisions applicable to new PAYG system.
- Expectation that complex contractual framework will not be required.

c. 2031: Modifications to decommission current system:

- Establish 'sunset' provisions for existing system.
- Obligations to fall away once the existing system is 'switched off.

Suppliers are advised to consider the implications for their front office agreement

Next Steps

- **GNI is seeking view of Suppliers on terms of extension of Siemens contract and related requirements.**

- **GNI to issue note to industry.**

13. AOB Items/Next Meeting

Gas Networks Ireland

13. Next Meeting

- Next Meeting is a hybrid meeting in the Dean Hotel, Cork on the 16th of October

13. Code Modification Forum Meetings in 2024

Next CMF Meeting

CMF Dates	Location
14 February	Virtual
24 April	Hybrid (Dublin)
13 June	Hybrid (Dublin)
4 September	Virtual
16 October	Hybrid (Cork)
4 December	Virtual

Thank you for your participation

Gas Networks Ireland