Code Modification Forum Agenda

Wednesday,14 February 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* - *Operational Maintenance* - *IT Maintenance/updates* - *GNI presentation Brighouse Bay Station Split Development*	20	10:40 - 11:00
4.	*Update on Mitchelstown CGI*	10	11:00 - 11:10
5.	*Code Modification A113 - Amendment to Code of Operations to amend gas quality requirements at Entry Points - mention*	5	11:10 - 11:15
6.	*Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network-mention*	5	11:15 - 11:20
7.	*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 - Update*	5	11:20 - 11:25
8.	*Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,00kWh as LDMs*	10	11:25 - 11:35
9.	*Status of Code Modification Proposals*	5	11.35 - 11:40
10.	*GNI Meter Data Cleansing Policy Document*	5	11:40 - 11:45
11.	*Gas and Electricity Interaction*	15	11:45 - 12:00
12.	*NGEM Exercises - GNI Presentation Update*	10	12:00 - 12:10
13.	*Biomethane for Shrinkage update*	10	12:10 - 12:20
14.	*Gas Quality - Proposed Changes Update - UK /EU*	20	12:20 - 12.40
15.	*AOB Items/Next Meeting*	5	12:40 - 12:45

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Code Modification Forum

Minutes of Hybrid Meeting– 14 February 2024

1 Introduction

The Transporter opened the meeting and referred to a fifteen item Agenda and the accompanying Slide Deck.

2 Standing Items

2.1 Approval of minutes of previous meeting

The Minutes of the CMF meeting of 13 December 2023 were issued on 4 January 2024. These minutes were approved.

2.2 Review of action items

Action Items C572, C575, C579, C580, C581, C584 and C587 will remain open, while Action Items C582, C583, C585 and C586 are now complete. Please refer to Slides 4 to 7 for more detail. Further Actions items C588 and – C589 were undertaken by the Transporter and the EAI, more detail of which can be found in Section 8.

2.3 GNI Scheduled Maintenance Update

Tom Hegarty, Network Operations Manager at the Transporter, presented on planned Maintenance, referring to Slide 8. Mr. Hegarty detailed that the Transporter 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 at the Bellanaboy entry point will be coordinated with planned maintenance shutdowns by the Corrib Operator. Mr. Hegarty also detailed how the Transporter might facilitate flows in the South-North pipeline for pigging inspection. In response to questions from the Regulator and a representative from the electricity industry, Mr. Hegarty detailed that pigging of the SNP will have no impact on the Dundalk area.

Following Mr. Hegarty's presentation, Brendan McCarthy, Interconnector Operations Manager at the Transporter presented an overview on the planned Brighouse Bay Station splitting project, more detail of which can be found on slides 9-12.

2.4 Gas Quality Update

Michael Crowley, Asset Policy & Performance Manager at the Transporter, presented an update on proposed UK and EU gas quality changes, referring to Slides 31 to 46. In response to Mr. Crowley's presentation, the Regulator stated that they wanted to have an in-house discussion regarding what potential recommended gas quality standard changes in the revised EN 16726 currently out for enquiry would, once finalised, be implemented in the Code of Operations or would be the subject of an "A-deviation" notice

3 Biomethane Update

3.1 Update on Mitchelstown CGI

Yvette Jones, Project Manager at the Transporter, gave a verbal update on the Mitchelstown CGI project. Ms. Jones detailed that the Transporter is still progressing arrangements and are targeting a commissioning date of Q1 2025. Ms. Jones also stated that once she receives internal confirmation on certain arrangements, she will bring a more detailed update to the CMF. In response to the verbal update, the Regulator thought it would be worthwhile to have a detailed plan in terms of key engagement points with the CMF working back from when the Transporter is planning on the CGI going live. The Regulator acknowledged that there is significant interest from the CMF in this project and that for the project to progress, key details will have to be teased out in the CMF. Ms. Jones said that she will continue to engage with stakeholders on this topic and on Code Modification Proposal A113, with the aim of having a more detailed update at the next CMF. The Transporter agreed to leave Action Item C584 open.

An industry representative asked could a briefing note along with a potential consultation period explaining the proposed business rules be circulated to the CMF. Ms. Jones responded that the Transporter is currently having internal workshops on these rules and are open to hearing feedback from all CMF members once they are finalized.

3.2 Biomethane for Shrinkage Update

Stephen O'Riordan, Wholesale Market Manager at the Transporter, gave an update on the Biomethane for Shrinkage proposal, referring to Slide 30. In response to Mr. O'Riordan's presentation, the Regulator queried the need for potential ministerial approval for this project. Mr. O'Riordan detailed because of the potential value of the contract over time and questions over state aid, it is the Transporters current belief that they may have to involve the Minister for explicit sign off. An industry representative queried why the Transporter was changing what he feels is currently a straightforward process for procuring Shrinkage gas for something that he feels is not as straightforward. Mr. O'Riordan assured the industry representative that he envisages that the outcomes of this process will be relatively straight forward, resulting in bilateral contracts between the Transporter and Shippers. The industry representative stated that he would like to continue discussions on this topic with the Transporter. Mr. O'Riordan detailed that the Transporter will be consulting on this fully in the public domain and with the CMF.

The Regulator queried whether there are any regulatory documents that will have to change as a result of this proposal. Mr. O'Riordan responded that an initial assessment has found that there will be modifications needed to the Code of Operations.

4 Code Modification Proposals

4.1 A111 – Amendment to Code of Operations to increase oxygen limit for biomethane entry points on transmission network.

Kieran Quill, Senior Market Analyst at the Transporter, presented an update on Code Modification Proposal A111, referring to Slides 16 and 17. In order to allow time for OEMs to finish their studies the industry review period for this code modification has been extended to 01 June 2024.

4.2 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.

Mr. Douglas O'Brien, Gas Point Register Manager at the Transporter, provided a presentation on the Code Modification Proposal A112, referring to Slides 18 and 19. He reported that the discussions with BGE, the current Supplier of Last Resort, had been limited since the previous Code Modification Forum meeting. He stated detailed that the Transporter is currently engaging with external legal advisors on revisions around text for the legacy Code "SOLR affected Shipper" provisions an issue that he states is not operationally a feature in the market at present. Mr. O'Brien stated that the Forum can expect further updates to previous supporting documentation.

4.3 A113 – Amendment to Code of Operations to amend gas quality requirements at Entry Points.

Kieran Quill, Senior Market Analyst at the Transporter, gave an overview of Code Modification Proposal A113, referring to Slides 14 and 15. As with A111 the Transporter detailed that it had meetings with large energy users where it was agreed to propose the extension of the review period of Code Modification A113 to the 01 June 2024.

4.4 A114 – Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,000 kWh as LDMs.

Kieran Quill, Senior Market Analyst at the Transporter, gave an overview of Code Modification Proposal A114, referring to Slides 20 and 21. Mr. Quill detailed that the industry review for this Code Modification closed on 31 January with one submission which supported the proposal. Mr. Quill acknowledged that the CRU raised a query with respect to Transporter revenue impacts, which will be addressed in the CMF Proposal Report. The Regulator queried whether there is a need for further consultation process period due to the potential wider regulatory and commercial impacts of this Code Modification proposal. A representative from

the electricity industry voiced his support for this proposal, stating that this Code Modification is reflecting some of the recent changes in the capacity market.

4.5 Status of Open 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 Review	To allow time for OEMs to finish their studies.	01/06/2024	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 Review	To allow time for OEMs to finish their studies.	01/06/2024	CMF Proposal Report to issue
A114	Re-classify Gas Points with a design MHQ of 100,000KWh as LDM	Industry Review	To allow industry to make any formal submissions to the Transporter.	14/02/2024	CMF Proposal Report to issue

5 Other Agenda Items

5.1 Gas and Electricity Generation

Jason Herbert, Policy Analyst at the Electricity Association of Ireland presented an update on timelines of their OEM process regarding Code Modifications A111 and A113, referring to slides 24 to 27. In response to Mr. Herbert's presentation, Yvette Jones, Project Manager at the Transporter, apologized for the delay in reverting back to the EAI on questions regarding fuel specifications, Ms. Jones detailed that the reason for this delay was that the Transporter was engaging with an external expert on the specifications and requested that Mr. Herbert shared the Transporters findings with all EAI members.

The Regulator queried whether the EAI will have to wait for all its members to finish their OEM studies before they can develop an overall position on Code Modifications A111 and A113. Mr. Herbert responded that the EAI will not be taking a view until they get assurances from all their members based on their OEM reports. He states that the reason for this is because changes to fuel specifications and how these specifications are implemented are very specific to a manufacture's equipment. Mr. Herbet also stated that he has no indication that some of his members OEM process will end in 2024. In response, the Regulator stated that they will have no view on potential Security of Supply implications until they see the final OEM reports. Stephen O'Riordan, Wholesale Market Manager at the Transporter stated that there is also Security of Supply questions around the open gas quality Code Modifications at present as they relate to Security of Supply on the gas network. This point was acknowledged by the Regulator and Mr. Herbet assured the Forum that their OEMs were looking at both changes in gas quality and the Wobbe index.

The Regulator queried what policy changes are coming regarding changes in gas quality measurements. The Regulator also encouraged dialogue on this topic between the Transporter and the market on this topic. Mr. O'Riordan detailed that the Code currently has a single gas quality specification and with more renewable gas coming online and more gas quality variations, there will be likely more gas quality specification changes. He believes that variability in tracking gas quality could become difficult if there is uncertainty around speciation.

A representative from the power generation sector detailed that the cost for generators regarding OEMs assessments and potential updates to equipment because of these specifications is expensive and believes that all these costs should be recovered. The Regulator queried whether there was a method through the SEM to recover these costs and does not see this as something for the forum to be involved in. Mr. Herbert believed that it would be useful for the EAI to have discussions with the Regulator on this topic. The Regulator believes that in the first instance that these issues should be considered on the electricity side but is still happy to engage with industry. An electricity industry representative also felt that going back to their OEMs on an incremental process based on constant gas quality changes is an expensive process. The Regulator appreciated the tension in constantly hiring the OEMs to review specifications and believes that this issue highlights the value of sharing positions in the CMF. An industry representative stated that he would like to see similar cost recovery mechanisms for Biomethane producers in the future.

A question was raised during Mr. Herberts presentation regarding whether biomethane producers will be blending LPG as gas quality changes. Ms. Jones acknowledged that propane

is expensive but stated that producers must meet GNI's gas quality specifications. A representative from the electricity industry queried the possibility of including propane as one of the hydrocarbon constituents in the Code. In response Michael Crowley, Asset Policy & Performance Manager at the Transporter detailed that propane isn't exclusive to Biomethane. Mr. Herbert detailed that it might be useful for the EAI to sit down with the Transporter an discuss some of these changes that are coming. The Transporter agreed to take an Action Item from this.

A representative from the power gen sector questioned if the if oxygen content is increasing it would be useful to know what impact this has on other constituents of the gas. Ms. Jones responded if there is an increase in oxygen, the other components of the gas decrease pro rata. Mr. Herbert agreed to give a further update on this topic at the next CMF.

5.2 Update on Security of Supply (SOS) / NGEM Update

Kieran Quill, Senior Market Analyst at the Transporter, provided a verbal update on the review of the Emergency Section of the Code of Operations. Mr. Quill detailed that there are two main aspects of the Code of Operations review. The first is to review the current accuracy of the provision itself and the second is to take into context the proposed mitigation option in the recent DECC report which talks about a strategic storage facility. The Transporter will be making a more detailed presentation at the April CMF.

6 Any Other Business

Stephen O'Riordan, Wholesale Maret Manager at the Transporter presented an overview of the Wholesale Gas Market Incident Management (WGMIM) Plan, referring to Slide 48. Mr. O'Riordan outlined that the Industry Review of this document is open until the 17th of April.

7 Next Meeting

The next meeting is a hybrid meeting scheduled to take place in the Ashling Hotel in Dublin on the 24 April.

8 Open CMF 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
C579	Transporter to build on steps outlined in slide presented in July and August CMFs (Biomethane for Shrinkage)	Transporter	18/10/2023	Ongoing
C580	Transporter is also to discuss proposed workshop with relevant partners on Biomethane for Shrinkage followed by potential anonymized consultation process.	Transporter	18/10/2023	Ongoing
C581	Transporter to circulate draft Process document on A109 for industry review	Transporter	18/10/2023	Ongoing

C582	Transporter to sit down with the Regulator to discuss some of the regulatory impacts coming from gas quality changes	Transporter	13/12/2023	Completed
C583	Transporter to create a table summarizing the different changes in Gas quality across Europe and the UK	Transporter	13/12/2023	Completed
C584	Transporter to provide an update focusing on timelines regarding how they plan on first engaging with the Regulator on the Mitchelstown CGI and in turn the Code Modification Forum	Transporter	13/12/2023	In Development
C585	Transporter to clarify questions around the Allocation Agent at the Mitchelstown CGI	Transporter	13/12/2023	Completed
C586	EAI to give timelines on OEM process	Transporter	13/12/2023	Completed

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
C588	Transporter to sit down with the EAI to discuss some gas quality changes	Transporter	14/02/2024	Ongoing
C589	EAI to give an update on OEM timelines at the April CMF	EAI	14/02/2024	Ongoing

9 Calendar of meeting for 2024

Next CMF Meeting

CMF Dates	Location
14 February	Virtual
24 April	Hybrid (Dublin)
12 June	Hybrid (Dublin)
22 August	Virtual
16 October	Hybrid (Cork)
4 December	Virtual

10 Attendees

Name	Organization
Conor Murphy	GNI
Kieran Quill	GNI
Stephen O'Riordan	GNI
Ryan O'Connell	GNI
Yvette Jones	GNI
Douglas O'Brien	GNI
Michael Crowley	GNI
Sean McParland	Energia
Paul Crowley	GNI
Tom Hegarty	GNI
Colm Griffin	GNI
Jason Herbert	EAI
Sam Clutterbuck	Ceres
Brendan McCarthy	GNI
Marvin Prince	BGE
Keith Deacon	Axpo
Tom Nolan	Ormond
Brian McGlinchey	Vermilion
Bryan Hennessy	Flogas
Paul Hoey	Electric Ireland
Paul Murphy	ESB
David Horan	Aughinish
Mark Phelan	Electric Ireland
Dermot O'Kane	Marex
Therese Lannon Crean	SSE
Stephen English	GMO
William Carr	ESB
Kat Mucha	Centrica

Emerson O'Callaghan	CRU
Sean Mac an Bhaird	CRU

Code Modification Forum

Gas Networks Ireland

Wednesday, 14 February 2024 – Teams

Agenda

1. Review of minutes from last meeting
2. Review of open actions
3. GNI Scheduled Maintenance Update
4. Update on Mitchelstown CGI
5. Code Modification A113 - Amendment to Code of Operations to amend gas quality requirements at Entry Points – mention
6. Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network - mention
7. 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 – Update
8. Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,00kWh as LDMs
9. Status of Code Modification Proposals
10. GNI Meter Data Cleansing Policy Document
11. Gas and Electricity Interaction
12. NGEM Exercises - GNI Presentation Update
13. Biomethane for Shrinkage update
14. Gas Quality - Proposed Changes Update - UK /EU
15. AOB items/Next meeting

1. Review of minutes from last meeting

Minutes of CMF meeting of 13 December were issued on 4 January.

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
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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
C579	Transporter to build on steps outlined in slide presented in July and August CMFs (Biomethane for Shrinkage)	Transporter	18/10/2023	Ongoing

2. Review of open actions

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C580	Transporter is also to discuss proposed workshop with relevant partners on Biomethane for Shrinkage followed by potential anonymized consultation process.	Transporter	18/10/2023	Ongoing
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C582	Transporter to sit down with the Regulator to discuss some of the regulatory impacts coming from gas quality changes	Transporter	13/12/2023	Completed

2. Review of open actions

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C584	Transporter to provide an update focusing on timelines regarding how they plan on first engaging with the Regulator on the Mitchelstown CGI and in turn the Code Modification Forum	Transporter	13/12/2023	In Development
C585	Transporter to clarify questions around the Allocation Agent at the Mitchelstown CGI	Transporter	13/12/2023	Completed

2. Review of open actions

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C586	EAI to give timelines on OEM process	Transporter	13/12/2023	Completed
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

3. 2022/2023 Maintenance Days

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

- Significant capital works are planned for Brighouse Bay compressor station during the summer – initial presentation following with subsequent meeting updates.

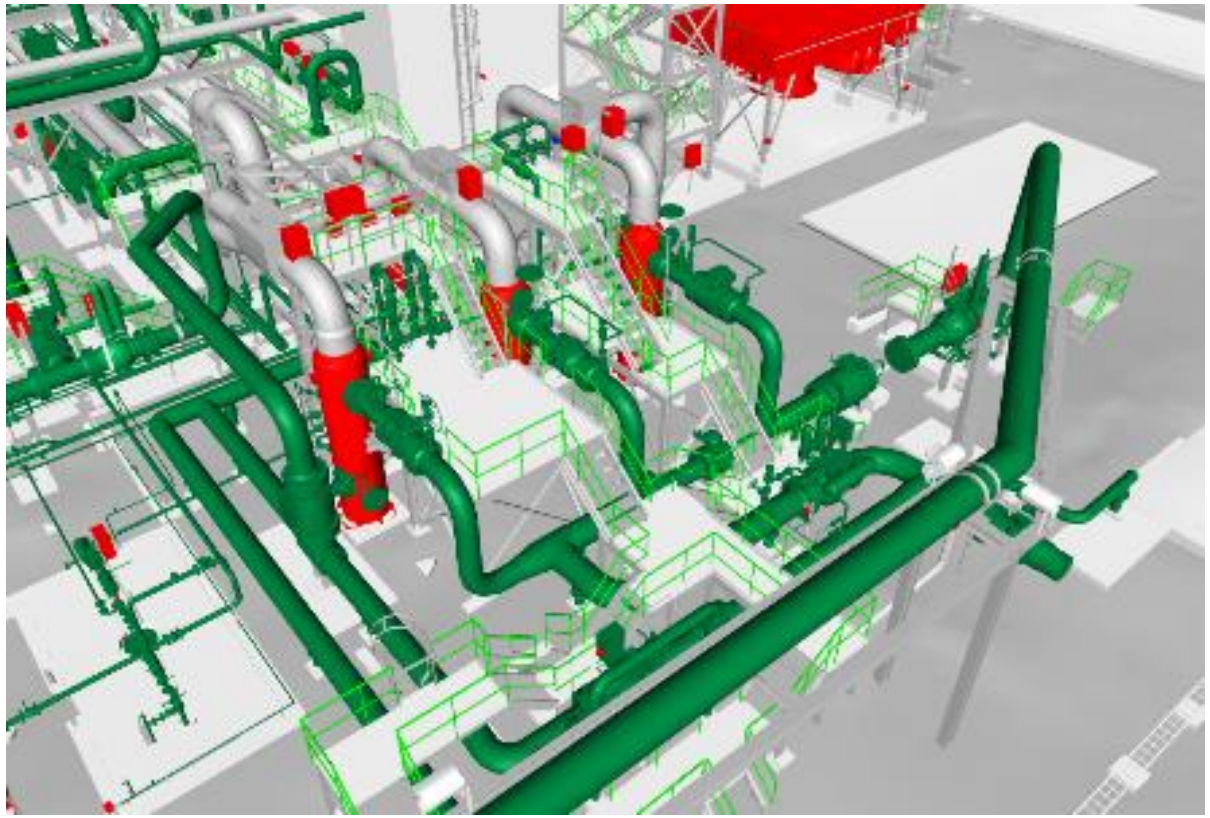
- All maintenance activities on GNI infrastructure/equipment relation to the Bellanaboy entry point will be co-ordinated with planned maintenance shutdowns by the Corrib operator.

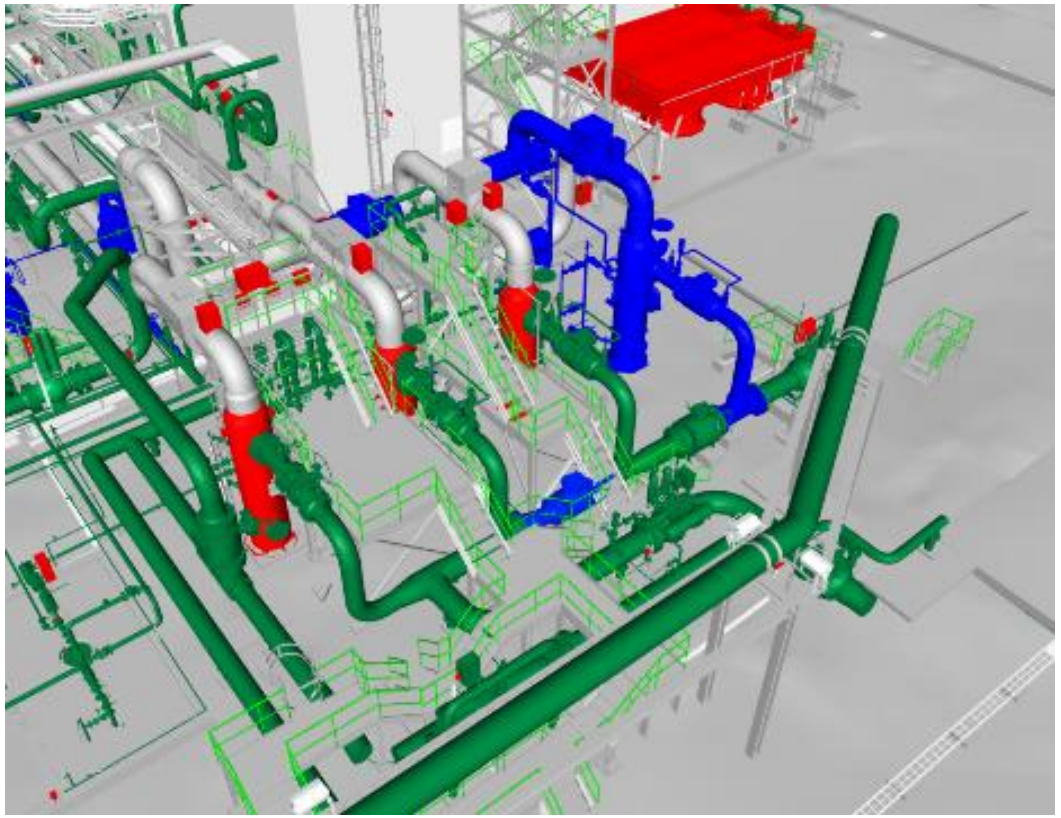
Brighouse Bay Station Splitting Project Overview

Brighouse Bay Station Splitting Project

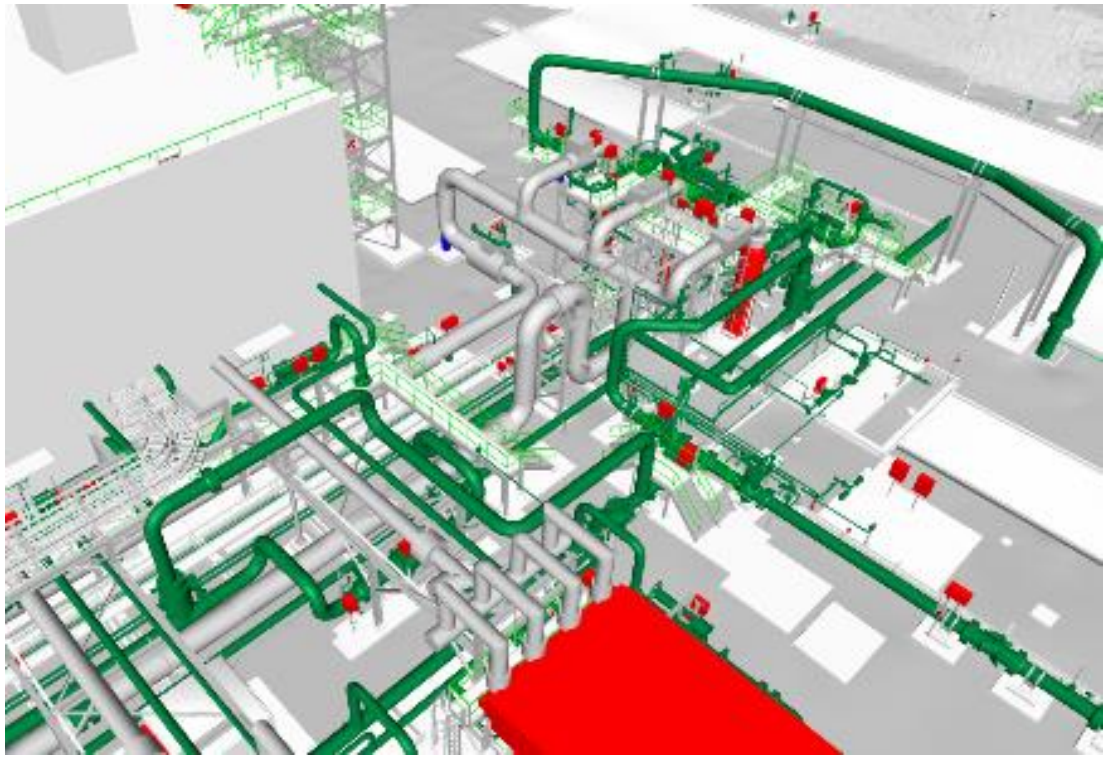
- Introduction: Project is last part of a strategic review which included a number of projects in Scotland and Ireland: Beattock Station Splitting 2021 / 22; 50km of SS2 pipeline in Scotland 2018; Ballough 2021.
- Purpose: To provide even greater operational flexibility to respond to an unplanned event that would maintain flows through the Station.
- Benefits: Increased flow capability; More flexibility to potentially maintain station flows where for example a corrosion point occurs; Provides operational flexibility when completing maintenance activities with an expected likely reduction to how frequently we need to take the station offline as Corrib flows reduce and gas generation plants increase.
- Negatives: Number of outages (8 hour windows x 4 est.) required this year with some phases needing dependency on 3 Units for 48 hour windows.
- Communications: Code Mod Forum regular updates, NI GMO forum at start as no impact to Beattock and NI supply.

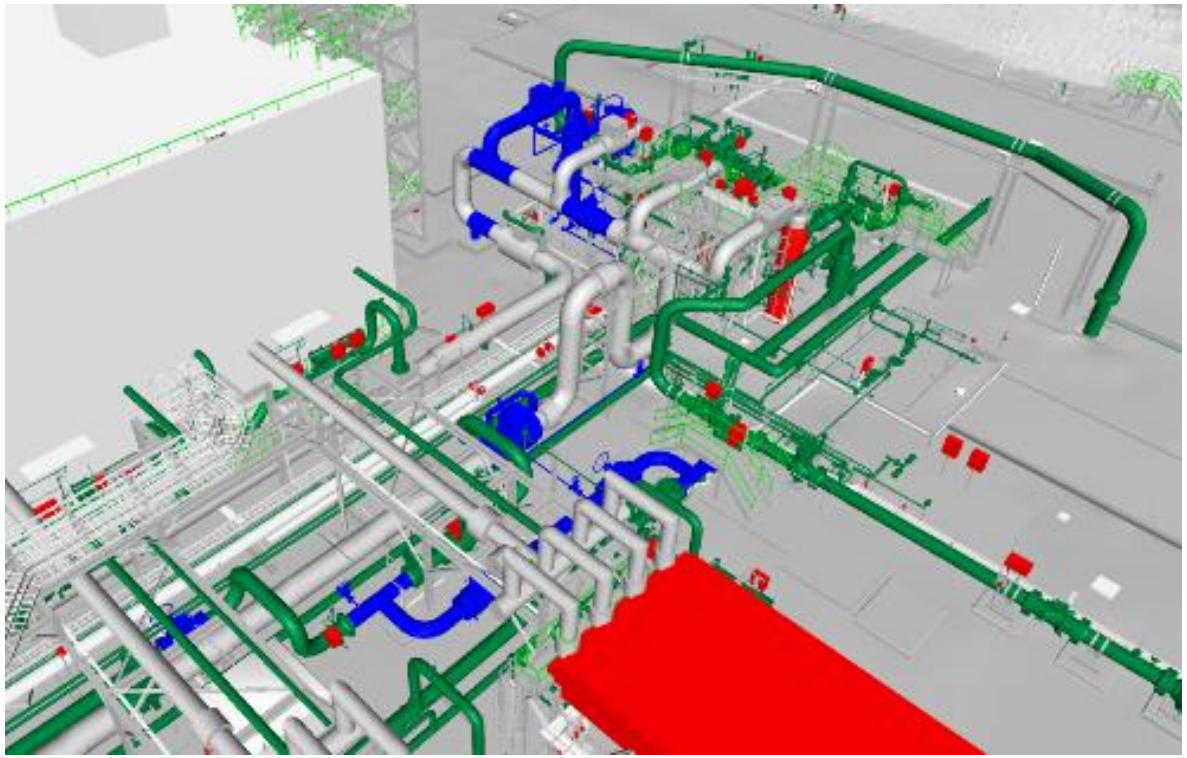
Brighouse Bay Station Splitting Project





Brighouse Bay Station Splitting Project





4. Update on Mitchelstown CGI (Verbal Update)

Gas Networks Ireland

5. Code Modification Proposal A113

Gas Networks Ireland

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

5. 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:** GNI had a meeting with the EAI and Power Generators where it was agreed to propose extending timelines of gas quality Code Modifications A111 and A113 until the 1 June 2023.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A113	Amendment to Gas Quality Standards at Entry Points	Industry Review	To allow time for OEMs to finish their studies.	01/06/2024	CMF Proposal Report to issue

6. Code Modification Proposal A111

Gas Networks Ireland

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

6. 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

- Review process ongoing. In line with A113 the industry review date extends to 1 June 2024.
- Industry submissions to date can be accessed on slides 42 and 43 on the following Slide Deck.

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 Review	To allow time for OEMs to finish their studies.	01/06/2024	CMF Proposal Report to issue

7. 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.

7. 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

8. 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

8. 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.
- CRU raised a query with respect to GNI revenue impacts, GNI will address this query in the CMF Proposal Report.
- **Next Steps:** GNI to furnish CMF Proposal Report to the CRU.

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	Industry Review	To allow industry to make any formal submissions to the Transporter.	14/02/2024	CMF Proposal Report to issue

9. Status of Code Modification Proposals

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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
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10. GNI Meter Data Cleansing Policy Document (Verbal Update)

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11. Gas and Electricity Interaction

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ELECTRICITY ASSOCIATION OF IRELAND

Code Mod Forum 14th February 2024

A decarbonised future powered by electricity

INCREASED OXYGEN LIMIT

- EAI members are using the specification of the code modification as projected gas quality i.e. maximum impact scenario.
- Some members have begun process with OEM, with results due by the end of summer. Other members are at an earlier stage of contacting OEM

Initial Feedback

- OEMs require more detail of fuel specifications. Clarity on timelines for this info is appreciated.
- Monitoring of gas quality at various points of the grid of the gas characteristics as fuel spec changes would be very useful.

Raising of Upper Wobbe Limit

- UK proposals to increase Wobbe limit to facilitate LNG.
- Ofgem Call for input due 29th February.

Low Wobbe Biomethane

- Will biomethane producers be blending LPG as gas quality changes?

Efficiency Changes from Oxygen Content Increase

- How will efficiency changes be reflected in metering?
- Will there be grid located metering changes?
- Is there analysis on the impact of efficiency changes to electricity customers?

12. NGEM Exercises – GNI Presentation Update (Verbal Update)

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13. Biomethane for Shrinkage

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13. Shrinkage Biomethane Contract

1. Currently – Internal Process
    a) Developing Heads of Terms
    b) Process Timelines
    c) Internal Approval process
    d) Share proposal with CRU
2. Subject to Approval Commence Procurement Process
    a) Issue Pin which allows consultation period with industry & public
    b) Consultation period – followed by adjustment to proposals following input from industry/public
    c) Procurement Process, RFI, PQQ, Tender
    d) Tender Assessment
    e) Approval Process – Internal Board, CRU, Ministerial Approval

14. Gas Quality – Proposed Changes Update – UK/EU

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14. Background

- European technical standard EN 16726 (Gas Quality) has been revised and submitted for enquiry, and now includes:
  - WOBBE index range
  - Increased Hydrogen (H2) limit
  - Revised or “restated” Oxygen (O2) limit
  - WOBBE classification system for exit points
- Opportunity to further review the gas quality specification in Appendix No.1 Part G of the Code
  - Decide whether to align or seek an A-Deviation (to note any differences)
- Also to decide whether to harmonise Appendix No.1 (Entry) with Appendix No.2 (Exit) in Part G of the Code

14. Revised EN 16726: Proposed changes

- WOBBE Index (WI) range for Entry: 46.44 ≤ WI ≤ 54.00 MJ/m^3
- O2 limit has simply been “restated”: ≤ 1.000 mol% unless sensitive downstream customers – then ≤ 0.001 mol%
  - Previously stated other way around!
  - Sensitive customers defined in terms of storage facilities
- H2 limit increased to ≤ 2.0% - in line with proposed European Union Gas Regulation
- WOBBE Classification system: Requirement to classify customers depending on the forecast WI range

14. WOBBE Index (WI)

- Proposed WI range in EN 16726 is significantly wider than Code:
  - 46.44 to 54.00 MJ/m^3 versus 47.20 to 51.40 MJ/m^3 in the Code
  - There is a Code MOD to reduce the lower WOBBE limit from 47.2 to 46.5 MJ/m^3 – to realign with proposed change in Great Britain (GB)
    - If implemented this would harmonise the lower limit with EN 16726
- Upper limit of 54.0 MJ/m^3 is much higher than 51.4 in the Code
  - Currently no plans to increase upper WI in the Code?
  - Widening upper index to 54.0 MJ/m^3 is likely to be challenging for some end-users (e.g. power generation)
    - Also potentially increases the risk of Carbon Monoxide (CO) poisoning

14. Oxygen (O2)

- O2 limit has been restated to support biomethane
  - i.e. ≤ 1 mol% if no sensitive downstream customers and ≤ 0.001 mol% if there are downstream customers (e.g. gas storage facilities)
- The Code currently aligns with EN 16726 for Distribution (DX)
- Code MOD to increase Transmission (TX) limit to 0.5%:
  - Biomethane producer(s) would like to go to 1.0 mol% but some end-users concerned about impact on equipment (e.g. power sector)?

14. Hydrogen (H2)

- No limit in previous version of EN 16726, but ≤ 2.0 mol% in revision to reflect EU Gas Regulation
  - Will require Member States to accept up to 2.0 mol% H2 at Interconnection Points (IPs)
    - Higher limits can also be agreed at IPs
    - Unclear if this applies to Ireland post Brexit?
  - Lower limit in Code simply reflects the fact that very little H2 is normally present in natural gas
- *Will need to consider a higher H2 limit in the Code in the future – in order to decarbonise the natural gas system?*

14. WOBBE Classification

- Will require end-users to be classified into categories:
  - **Class specified**: If forecast WI range ≤ 3.7 MJ/m^3 & WI ≤ 53.0 MJ/m^3;
  - **Class extended:** If forecast WI range > 3.7 MJ/m^3 & WI > 53.0 MJ/m^3
    - *Essentially if WI range ≤ 3.7 MJ/m^3 then gas appliances should be able to safely burn the gas*
- System operator will need to identify sensitive users and appropriate mitigation measures (use of cost-benefit analysis etc)
  - E.g. enhanced and more timely gas quality information flows etc
    - *Language around mitigation measures is vague and will probably need to be interpreted by national regulatory authorities*

14. Other gas quality variations

- Other variations with EN 16726 are due to alignment of Code with GB gas quality: e.g. total sulphur & Carbon Dioxide (CO2) content
- Total sulphur content in Code ≤ 50 mg/m^3 aligns with GB limit
  - Although total sulphur is normally ≤ 11 mg/m^3, GNI cannot guarantee this will always be the case
- Code aligns with EN 16726 for CO2 limit ≤ 2.5 mol%, however, allows for higher limit if total inert content ≤ 8.0 mol%
  - Based on historic GB criteria and may exceed 4.0% limit in EN 16726
  - Also possible for CO2 content of St Fergus gas to exceed 4.0% limit (i.e. the main source of Moffat gas)

14. Gas quality parameters not in Code

- EN 16726 includes a number of parameters not specified in the Code: Relative Density (RD), Mercaptan sulphur & Methane No.
  - There is a proposed Code MOD to replace ICF and SI with a RD ≤ 0.7, which would harmonise this limit with EN 16726
  - Mercaptan sulphur (without odorant) ≤ 6.0 mg/m^3:
    - Shouldn't be an issue as most mercaptan in GNI gas is from odorant?
  - Methane No. ≥ 65, refers to the performance of Compressed Natural Gas (CNG) vehicles (to avoid "knocking of engine")

14. Timeline for EN 16726 revision

- Revised EN 16726 is currently out for enquiry:
  - CEN members can submit comments and propose changes etc
- CEN 234/WG 11 will consider feedback and submit final version for Formal Vote:
  - National CEN mirror committees will then vote – e.g. NSAI TC 11 (Gas Quality) in the case of Republic of Ireland (ROI)
  - Voting is weighted according to CEN member state populations
- If sufficient countries vote in favour of revision, then it will be finalised and published – Likely mid-2025 at the earliest

14. En 16726 & “National Regulations”

- If revision to EN 16726 is eventually approved then it must be adopted – **unless there is an overriding national regulation**
  - In which case the member state should seek an “A-deviation” to formally record which parameters do not comply with EN 16726
- GNI currently assumes that Part G (technical) of the Code is equivalent to national regulation and should supersede EN 16726?
- Ideally any conflicts between the Code and EN 16726 should be recorded as an A-deviation in revised standard

14. Extract from EN 16726

Annex G
(informative)

A–deviations

A- deviation: National deviation due to regulations, the alteration of which is for the time being outside the competence of the CEN/ CENELEC member:

This European Standard does not fall under any Directive of the EU.

In the relevant CEN/ CENELEC countries these A- deviations are valid instead of the provisions of the European Standard until they have been removed.

A1

Denmark:

Clause	Deviation

14. Response to EN 16726

- NSAI TC11 (Gas Quality) will formally respond to EN 16726 public enquiry – including requesting any A-deviation
- But the Code Modification Forum manages the gas quality specification in Part G of the Code
- Obvious approach is for Code Modification Forum to decide on how far to align with draft revision to EN 16726
  - NSAI TC11 to draft A-deviation for parameters which will remain in conflict with draft revision to EN 16726 etc

14. Realignment of Entry & Exit

- Main gas quality specification is in Appendix No.1 of Part G of the Code – for Entry & IPs
- There is also a gas quality specification in Appendix No.2 for Exit
  - Less detailed – only WI, H2S, total sulphur, O2 & contaminants
  - Limits are the same except for WI range – which is wider than Entry
    - 45.7 to 54.7 MJ/m^3 at Exit (also wider than proposed EN 16726 WI range)
    - Versus 47.2 to 51.4 MJ/m^3 at Entry
- *GNI would recommend realigning WI at Exit WI with Entry range*
  - No engineering reason for the Exit WOBBE to be materially different from the Entry WI

14. Gas Quality Summary Table

No.	Gas Quality	Code of Operations	EN 16726	Comment
Gas Quality parameters specified in the CODE: Appendix No.1, Part G (Technical) for Entry Points				
1	Total Sulphur	< 50 mg/m3 (including H2S)	< 11 mg/m3 (without odorant)	Higher H2S specified to ensure alignment with GB gas quality specification at Moffat
2	Oxygen	≤ 0.2 mol% for TX ≤ 1.0 mol% for DX (Renewable) See Note [4]	≤ 1.0 mol% ≤ 0.001 mol (for sensitive user)	Aligned at DX level, Code MOD to increase to 0.5% at TX
3	Carbon dioxide (CO2)	≤ 2.5 mol% But higher if total-inerts < 8%	≤ 2.5 mol % ≤ 4.0 mol/mol%	St Fergus gas may potentially exceed 4.0%, UNC modifications allow up to 6.0%
4	Hydrogen Sulphide (H2S)	≤ 5 mg/m3	≤ 5 mg/m3	Aligned
5	Water-content	≤ 50 mg/m3	< -8 degree C @ 70-bar	Aligned
6	Gross Calorific Value (GCV)	≥36.9 MJ/m3 (lower limit) ≤42.3 MJ/m3 (upper limit) (real dry gross)	Not specified in EN 16726	Not specified in EN 16726
7	WOBBE Index (WI)	47.20 MJ/m3 (lower limit) 51.41 MJ/m3 (upper limit) (real dry gross)	46.44 MJ/m3 (lower limit) 54.00 MJ/m3 (upper limit) (real dry gross)	Lower limit will be aligned if Code MOD is agreed, but there will be significant difference at upper limit
8	Contaminants & Odour	See Notes [1],[2]	See Notes [1],[2]	Aligned on contaminants but no requirement for odorisation in EN 16726
9	Incomplete Combustion Factor (ICF)	< 0.48	Not specified in EN 16726	Will be aligned if Code MOD to replace with ICF & SI with RD approved
10	Delivery temperature	1 - 38 degree C	Not specified in EN 16726	Not specified in EN 16726

*This table is furnished by GNI for general information purposes only to members of the CMF. It should not be relied on as definitive, and stakeholders should research the documentation in this area. GNI have no responsibility for any errors or admissions in the content of this table.

14. Gas Quality Summary Table

No.	Gas Quality	Code of Operations	EN 16726	Comment
Gas Quality parameters specified in the CODE: Appendix No.1, Part G (Technical) for Entry Points				
11	Hydrogen (H2)	< 0.1 mol%	< 2.0 mol%	EN 16726 has been updated to reflect new EU gas regulation at Interconnection Points (IPs)
12	Soot Index (SI)	< 0.60	Not specified in EN 16726	Will be aligned if Code MOD to replace with ICF & SI with RD approved
13	Organo Halides	< 1.5 mg/m3	Not specified in EN 16726	Not specified in EN 16726
14	Radioactivity	< 5 Becquerels/g	Not specified in EN 16726	Not specified in EN 16726
15	Ethane	< 12 mol%	Not specified in EN 16726	Not specified in EN 16726
16	Nitrogen (N2)	≤ 5.0 mol%	Not specified in EN 16726	Not specified in EN 16726
17	Hydrocarbon Dewpoint	< -2 degree C up to 85-bar.g	< -2 degree C up to 70-bar.g	Aligned
Gas Quality parameters NOT specified in the CODE				
18	Relative density	Not specified in the Code	< 0.7	Will be aligned if Code MOD to replace with ICF & SI with RD approved
19	Methane Number	Not specified in the Code	≥ 65.0	Not specified in the Code
20	Mercaptan sulphur	Not specified in the Code	< 6.0 mg/m3	Not specified in the Code
Notes				
[1] Both have language around the gas shall not contain any solids, liquid or gaseous material that would interfer with safe operation of the system or combustion in appliances ... etc				
[2] The Code of Operations requires all gas to be odorised but EN 16726 does not, as many European TX systems are not odorised				

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15. AOB Items/Next Meeting

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15. Wholesale Gas Market Incident Management Plan (WGMIM)

- The Draft Wholesale Gas Market Incident Management Plan (WGMIM) outlines how Wholesale Market stakeholders will be convened in the event of a major incident.
- This plan may be implemented in conjunction with The Natural Gas Emergency Plan (NGEP) to provide high **level updates** to wholesale market stakeholders.
- **The NGEP will still manage and resolve the emergency** – the Wholesale Gas Market Incident Management (WGMIM) group may join with the **Retail Gas Market Incident Management (RGMIM)** group to inform stakeholders and customers of the issue at hand.
- This group will be one step removed from the operational interface, and will provide updates on a **best endeavours basis**.
- The purpose of this document is to:
  - ensure proper, defined structures are in place with respect to **stakeholder communications** in the event of a major incident that affects the wholesale gas market;
  - **Identify the key stakeholders** and means of communication; and
  - establish a **collaborative approach** to help resolve incidents.

Next Steps: Industry Review of this document is open until the **17th of April**.

15. Next Meeting

- Next Meeting is hybrid (Ashling Hotel Dublin) and scheduled for 24 April.

15. Code Modification Forum Meetings in 2024

Next CMF Meeting

CMF Dates	Location
14 February	Virtual
24 April	Hybrid (Dublin)
12 June	Hybrid (Dublin)
22 August	Virtual
16 October	Hybrid (Cork)
4 December	Virtual

Thank you for your participation

Gas Networks Ireland