Code Modification Forum Agenda Wednesday, 16 February 2022

Time: <u>10:30</u>

| No. | <u>Item</u> | Duration (minutes) | <u>Time</u> |
|-----|---|--------------------|---------------|
| 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 - Update on Beattock Bay Compressor Station Upgrade Project | 10 | 10:40-10:50 |
| 4. | Gas Quality – Proposed Changes Update | 15 | 10:50-11:05 |
| 5. | Update on GTMS | 5 | 11:05-11:10 |
| 6. | Code Modification Proposal A104- Amendment to Code of Operations to transfer Capacity Overrun Charge revenues to allowed revenues and removing the maximum annual caps on overrun charges (For mention) | 5 | 11:10- 11:20 |
| 7. | Code Modification Proposal A104A – Amendment to Code of Operations to transfer Scheduling Charge revenues to allowed revenue (For mention) | 5 | 11:20 -11:25 |
| 8. | Code Modification Proposal A103A – Removal of redundant terminology in Code of Operations arising from A103 (For mention) | 5 | 11:25-11:30 |
| 9. | Code Modification Proposal A105- Amendment of Code of Operations to delete references to Kinsale Field (For mention) | 5 | 11:30-11:35 |
| 10. | Code Modification Proposal A106 – Deletion of Entry Point Transfer Provisions from the Code of Operations | 10 | 11.35-11.45 |
| 11. | Code Modification Proposal A107 Amendment to Code of Operations to remove annual caps on non-SPC Capacity Overrun Charges- | 10 | 11:45-11.55 |
| 12. | Status of Code Modification Proposals | 5 | 11:55- 12:00 |
| 13. | Disbursement Account Adjustment Charge Query | 20 | 12:00-12:20 |
| 14. | Gas and Electricity Interaction | 5 | 12:20-12:25 |
| 15 | AOB Items – Textual and Numerical Changes to Version 5.04 of the Code of Operations/ Review of SPC Charging regime / Next Meeting | 5 | 12:25- 12:30 |

Code Modification Forum

Minutes of Zoom Meeting – 16 February 2022





The Transporter opened the meeting and referred to the 15 item Agenda.

1.Standing Items

1.1. Approval of minutes of previous meeting

The minutes of the Code Modification Forum ("CMF") Meeting of 15 December 2021 were agreed and approved.

For supporting information, to be read in conjunction with these minutes, please see the slides presented at the 16 February 2022 Zoom Meeting.

1.1 Review of action items

The actions from the previous CMF Meeting of 15 December 2021 were reviewed and discussed.

The Transporter gave an update on open actions as per slide 4 of this meetings presentation pack.

Action Item C572 would remain open, the Transporter confirmed that it would monitor, on an ongoing basis, the initial 25% Tolerance for RNG Entry Points.

Action Item C575, which requires the Transporter to furnish data to the CRU in connection with a review of SPC Settings for CNG Offtakes, would remain open.

Action Items C572 and C575 would remain open.

1.2 GNI Scheduled Maintenance Update

The Transporter referred to Slide 6 which detailed the updated Maintenance Plan for the 2021/22 Gas Year. Two dates were detailed for proposed maintenance activities at Bellanaboy with the Kinsale Field now fully decommissioned. The first date specified is on 22 March 2022 with planned maintenance of the odorant injection equipment. This should not affect flows on the day. The second date is now 5 July 2022 (amended to align with the annual Corrib Operator planned maintenance shutdown) when there will be Pressure System Regulations (PSR) testing of the station control system at Cappagh South and Emergency Shutdown (ESD) valve testing at the Corrib Terminal



The Transporter then made an updated presentation in relation to the ongoing Beattock Station Upgrade Project which involves the replacement of the existing suction and discharge header valves allowing a station split if an integrity issue arises or for maintenance purposes. Further there will be a modification to the station Volume Control System which will allow the Transporter control inlet pressure facilitating the operation of compressors at an optimum level.

The Transporter reported that the project was now mechanically complete with all pipework completed and isolators in place. The testing of the Control System and integration of Suction Control valves were now planned to take place over forty five days. This will involve shutting a valve from the station and grid room to station integration with other systems. Plans are in place with the grid room involved in remote testing with the control room on site.

1.3 GTMS Securing Communications Project Update

The Transporter reported that it hoped to deploy the changes in April to Live GTMS systems. The allowed cipher list was reduced with two 'CHACHA 20' ciphers removed. There are changes to the GTMS test environment this week and Shippers are strongly advised to test their connections.

1.4 Gas Quality Update

GAS QUALITY - EU/UK

On behalf of the Transporter, Michael Crowley, Asset Policy and Performance Manager, presented Slides 11-14 in respect of a UK Gas Quality update. Slide 11 referenced the HSE review decision wherein it rejected the proposed increase in the upper Wobbe limit and the proposal to take the UK gas quality specification from the GSM regulations and put it into an IGEM gas quality standard (slides 12 and 13 elucidate the reasons for the HSE decisions in this regard) . He referred to the HSE decision to put the other proposed changes out to consultation, i.e., 1) to reduce the lower Wobbe limit to 46.5 MJ/m3; 2) To increase the Oxygen limit to 1% for system pressures and 3) To replace the sooting index and incomplete combustion factor limits with a new Relative Density (RD) limit of <0.7 .

Finally, he gave the details for the consultation noting that it closes on 21 March. The consultation takes the form of a questionnaire process and he encouraged all market participants to engage and the Transporter was available to assist if requested

https://consultations.hse.gov.uk/hse/cd291-revision-gas-safety-management-regulations/

The CRU stated that it noted the concerns of Industry, particularly the Powergen sector, in relation to possible changes to gas quality and was in direct contact with the HSE expressing these concerns.



GAS QUALITY- Renewable Gas

The Transporter reported that the third party analysis of the studies commissioned by the Transporter will soon be completed. This be followed by internal review and Industry consultation. At this stage the Transporter was reporting an estimated commission date for the Mitchelstown CGI as late 2023/early 2024.

2 Code Modification Proposals

2.1 A104- Proposal to amend Code of Operations to transfer Capacity Overrun Charge revenues to allowed revenues and to remove the maximum annual caps on overrun charges

The Transporter reported that it was intended to retitle this Proposal to just an amendment to the Code of Operations to transfer Capacity Overrun Charge revenues to allowed revenues and the legal text confining the Proposal to this provision was circulated after the December CMF Meeting with an Industry review date up to 21 January . There was only one clarification query received which had been answered. As indicated at the December Meeting the Transporter had since issued a further Code Modification Proposal A107 proposing to delete annual caps on non-SPC Capacity Overrun Charges

2.2 A104A-Proposal to amend Code of Operations to transfer Scheduling Charge revenue to allowed revenues

The Transporter reported that the consultation period for the proposal and the associated legal text had ended and the matter was under review by the CRU.

2.3 A103A-Proposal to remove redundant terminology in Code of Operations arising from A103 (Removal of Balancing Tolerances)

The Transporter reported that the consultation period for the proposal and the associated legal text had ended and the matter was under review by the CRU.

2.4 A105 -Proposal to amend now redundant references to the Kinsale Field

The Transporter had issued this Proposal with associated text and an explanatory memorandum on 5 October 2021. After consultation with the CRU, the Transporter circulated, after the December



CMF a revised legal text to Industry with a review date ending on 28 January 2022. No responses were received.

At this stage the CRU stated that because of resource issues there had been delays on its part in finalising of Modification Proposals. Jack O'Connell, who had been retained as CRU advisor, was specifically engaged in this workstream and the CRU introduced Emerson O'Callaghan, a recent addition to its gas network team, who would be working in this area.

2.5 A106- Proposal to delete Entry Point Transfer Provisions from Code of Operations

The Transporter reported that, as flagged at the December CMF Meeting, it had issued and circulated the Proposal with an Explanatory Memorandum, on 10 January. The rationale for the Proposal is that the provisions are no longer relevant in a short term capacity regime, a new gas source is a remote prospect and the fact that it only referred to unbundled IP Capacity. The removal of these provisions would allow the Transporter to remove their systemisation from its GTMS IT system where it was causing unnecessary complexity and maintenance issues. The Industry review date for the Proposal would end on 31 March 2022.

2.6 A107 - Proposal to delete from Code of Operations annual caps on non-SPC Capacity Overrun Charges

The Transporter reported that, as flagged at the December CMF Meeting, it had issued and circulated, with an explanatory memorandum, this Proposal on 10 February. The rationale for the Proposal is that the provisions are no longer relevant as there is no realistic prospect of them being reached since the introduction of Daily Capacity Products, the calculation of Capacity Overrun Charges by reference to the Daily Capacity Tariff, the reduction of the overrun charge multiplier and the extended Capacity Booking Window. The removal of these provisions would allow the Transporter to remove their systemisation from its GTMS IT system where it was causing unnecessary system complexity and maintenance issues. The Industry review date for the Proposal would run up to the next CMF Meeting 13 April 2022.



2.7 Status of Code Modification Proposals

| Number | Proposal | Proposer | Status |
|--------|--|----------|---|
| A099 | CNG Supply Point Capacity Setting | GNI | In abeyance |
| A104 | Proposal to transfer Capacity Overrun Charge revenues to allowed revenues | GNI | Consultation complete/Under CRU review |
| A104A | Proposal to amend the Code of Operations to transfer Scheduling Charge revenue to allowed revenue | GNI | Consultation complete/under CRU review |
| A103A | Proposal to remove redundant terminology from Code of Operations arising from A103 | GNI | Consultation complete/under CRU review |
| A105 | Proposal to remove redundant references to the Kinsale Gas Field from the Code of Operations | GNI | Consultation complete/Under CRU review |
| A106 | Proposal to delete Entry Point Transfer Provisions from the Code of Operations | GNI | Under Industry review until 31 March 2022 |
| A107 | Proposal to delete annual caps on non-SPC Capacity Overrun Charges for the Code of Operations | GNI | Under review until CMF Meeting on 13 April |



4. Other Agenda Items

4.1. Disbursement Account Adjustment Query

The Transporter gave an update on the query raised at the previous CMF Meeting by Bord Gais Energy (BGE). The query arose from a meter error imbalance correction at an LDM site which occurred in October 2020 and where the volumes involved were not finalised until March 2021. The Transporter had invoiced BGE, as the Shipper at the site, for the outstanding volumes in the following month, i.e. the April invoice, at the prevailing monthly imbalance price in accordance with long established custom and practise and BGE contended that the imbalance price for each of the relevant adjustment months should have been used .

In response to the query the Transporter pointed out that this was a Disbursement Account issue in which it was cash neutral and the calculation used, while not specified in the Code of Operations, had been long established. It nevertheless recognised that it might be punitive in an era of unprecedented price volatility and suggested that the calculation be changed to an average imbalance price over the relevant months. This new provision would come into effect in the future have been incorporated into the Code of Operations

In the interim since the last meeting the Transporter had sought the views of Industry by means of a short questionnaire which was circulated after the meeting and with a submission date expiring on 28 January 2022. In Slides 26 to 28 inclusive the Transporter reported that four Shippers had referred to the questionnaire, that of the four all opted for a change to the use of an average monthly imbalance price for a multi-period volume adjustment, two said it should be implemented retrospectively and two in the future, and all concurred that the change should be incorporated in the Code of Operations.

The CRU noted the unanimity for the change to an average monthly price and the incorporation of this measure in the Code of Operations. The Transporter argued that a retrospective implementation of the provision would provide it with a huge administrative burden and would have to be applied for all adjustments impacting both positively and negatively on Shippers for already settled billings. BGE, who identified as one of the two Shippers who opted for a retrospective implementation argued that the present calculation had in relation to the specified query resulted in an unfair charge on their end user customer. PrepayPower, who identified as the other Shipper seeking a retrospective implementation confirmed their position.

The CRU directed the Transporter to prepare a draft Code Modification Proposal for a change to the new charging regime and indicated that it had commissioned reports from the Transporter on the administrative implications of a retrospective implementation. It noted that the specific issues around the metering error in question might be a GMARG matter and would speak to BGE directly



on the matter in due course. If any Shipper wished to make a further submission on the matter they could do so up until COB on the following Wednesday, 23rd February.

4.2. Gas and Electricity Interaction

This is a standing Agenda Item. The Transporter reported that it had sent the UK Gas Quality slides referred to above to the EAI in advance of the meeting. On foot of this the Transporter had agreed a meeting with representatives of EAI mainly in relation to the UK HSE consultation to take place on Monday the following week.

4.3. Any Other Business

Review of SPC Charging Regime e Transporter stated that it was continuing with a review of the SPC Charging Regime. It had held a Workshop with internal stakeholders and a number of actions arising were due to be completed and discussed in advance of the April CMF Meeting

Textual Changes on new version of the Code of Operations

The Transporter stated that it would be circulating a memorandum on intended textual and numbering changes to the updated version of the Code of Operations scheduled to issue in the first quarter of 2022. The review of the memorandum would continue until the April CMF

Next Meeting

The next meeting was proposed to be a physical meeting at the Ashling Hotel, Dublin on 13 April 2022. The Transporter confirmed that its current Covid policy allowed it to host the meeting. The CRU stated that its policy might not allow attendance and would liaise on the matter with the CRU in due course.

5. Open CMF actions

| ID | Action | Responsibility | Date Raised | Delivery Date |
|------|---|----------------|-------------|---------------|
| C572 | Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points | Transporter | 27/3/2019 | Ongoing |



Transporter to furnish required data to

CS75

CRU in connection with tariff review in relation to Supply Point Capacity Settings

Transporter/ CRU

25/3/2020

Ongoing

6. Calendar of meetings for 2022

| CMF Date | Location |
|--|----------|
| | |
| 13 th April 2022 (Wednesday) | Dublin |
| | |
| 15 th June 2022 (Wednesday) | Cork |
| | |
| 17 th August 2022 (Wednesday) | Dublin |
| 19 th October 2022 (Wednesday) | Dublin |
| 14 th December 2022 (Wednesday) | Dublin |

7. Attendees

| | Name | Representing |
|---|----------------|--------------|
| 1 | Stephan O'Hare | GNI |
| 2 | | |
| | Kieran Quill | GNI |
| 3 | Ike Udobi | GNI |
| 4 | | 0.11 |
| | Doug O'Brien | GNI |



| 5 | Brian Mc Glinchey | Vermilion |
|----|-----------------------|------------------|
| 6 | Michael Crowley | GNI |
| 7 | | |
| 8 | Richard Harper | Nephin Energy |
| | Martin Regan | Marex Spectron |
| 9 | Harry Molloy | Tynagh |
| 10 | Bryan Hennessy | Naturgy |
| 11 | Kevin Murray | BGE |
| 12 | Donovan P.G. Sheridan | PrepayPower |
| 13 | Sean Mac an Bhaird | CRU |
| 14 | Emerson O'Callaghan | CRU |
| 15 | David Horan | Aughinish |
| 16 | Brigid Reilly | Prepaypower |
| 17 | Nick Lincoln | Nephin Energy |
| 18 | Peter Colleran | Nephin Energy |
| 19 | Paul Hoey | Electric Ireland |
| 20 | Jack O'Connell | CRU Advisor |



Code Modification Forum

Wednesday, 16 February 2022 (via Zoom Call)

Agenda

- Review of minutes from last meeting
- Review of open actions
- Update on Maintenance / Update on Beattock Bay Compressor Station Project
- GTMS Update
- 5. Gas Quality Proposed Changes Update
- 6. Code Modification Proposal A104- Amendment to Code of Operations to transfer Capacity Overrun Charge revenue to allowed revenues and removing the maximum annual caps on overrun charges
- 7. Code Modification Proposal A104A Amendment to Code of Operations to transfer Scheduling Charge revenues to allowed revenues
- 8. Code Modification Proposal A103A Removal of redundant terminology from Code arising out of A103
- Code Modification Proposal A105- Amendment of Code of Operations to delete references to the Kinsale Field
- 10. Code Modification Proposal A106- Deletion of Entry Point Transfer Provisions from Code of Operations
- 11. Code Modification Proposal A107- Amendment to Code of Operations to remove annual caps on non-SPC Capacity Overrun Charges
- 12. Status of Code Modification Proposals
- Disbursement Account Adjustment Query
- 14. Gas and Electricity Interaction
- 15. AOB Items Textual and Numerical Changes to Version 5.04 of Code of Operations / Review of SPC Charges regime/
 Next meeting

 Gas
 Next meeting

1. Review of minutes from last meeting

• Minutes of CMF meeting of <u>15 December 2021</u> were issued on 19th January 2021.



2. Review of open actions

| ID | Action | Responsibility | Status | Priority |
|------|---|----------------|--------|----------|
| C572 | Transporter to monitor on ongoing basis the adequacy of the initial 25% tolerance for RNG Entry Points | Transporter | Open | Medium |
| C575 | Transporter to furnish required data to CRU in connection with the tariff review in relation to SPC Settings for CNG Offtakes | Transporter | Open | High |





3. Update on Maintenance and Beattock Bay Compressor Station Project

3. 2021/2022 Maintenance Days

| Maintenance Programme Gas Year 2021/2022 | | | | |
|--|----------|---------------------|---|--|
| Date | Duration | Entry Points | Commentary | |
| 22 nd March 2022 | 1 | Bellanaboy | Functional safety and Original Equipment Manufacturer (OEM) maintenance of the Moneynieran Odorant injection equipment. This should not affect flow. | |
| 5 th July 2022 | 1 | Bellanaboy | Pressure System Regulations (PSR) testing of the station control system at Cappagh South, Emergency Shutdown (ESD) valve testing at the Corrib Terminal. This has been moved to align with the planned shut-down at the terminal. | |

Imports at Inch have ceased so there is no requirement for maintenance days at the entry point



3. Beattock Station Upgrade Project Status

- Background: Installation of ability to Split Beattock Compressor Station, and also Suction Control Valves to assist management of high inlet pressures.
- Valves for Suction Control and tie in to site pipework completed January 2022.
- Testing of the Control System and integration of Suction Control Valves planned to take place over 45 days between April and beginning June 2022.





4. GTMS Update

4. GTMS – Securing Communications

- From April 2022 the GTMS application connections from web browsers and back-end systems (via web services) will support only TLSv1.2 connections with the following ciphers etc.
 - ECDHE-ECDSA-AES256-GCM-SHA384
 - ECDHE-RSA-AES256-GCM-SHA384
 - ECDHE-ECDSA-AES128-GCM-SHA256
 - ECDHE-RSA-AES128-GCM-SHA256
 - ECDHE-ECDSA-AES256-SHA384
 - ECDHE-ECDSA-AES128-SHA256
 - Shippers are kindly requested to communicate these upcoming changes with their respective internal IT teams to ensure continued access to the application.
 - These changes are currently deployed to the GTMS test environments, shippers are strongly advised to use these environments to validate their connections.



5. Gas Quality Update

UK Gas Quality Changes

5. UK Gas Quality – January 2022 update

- HSE letter sent to IGEM summarising their review of proposed changes to UK gas quality arrangements:
 - They have **REJECTED** two proposed changes, namely:
 - To increase the upper WOBBE No. (WN) limit to 52.85 MJ/m3; and
 - To take out the UK gas quality specification from the GSMR regulations and put it into an IGEM gas quality standard.
 - They agreed to put the other proposed changes out to public consultation, namely:
 - To reduce the lower WN limit to 46.5 MJ/m3;
 - To increase the Oxygen (O2) limit to 1% for system pressures < 39 bar; and
 - To replace the sooting index and incomplete combustion factor limits with a new Relative Density (RD) limit of < 0.7.



5. HSE reasons for rejecting increase to upper WN limit

- The HSE rejected increasing the upper WN limit due to risk of increased Carbon Monoxide (CO) poisoning and additional fatalities from a high WN gas
 - Incompatible with Safety at Work Acts to maintain or improve health & safety standards
- HSE noted that there could potentially be significant additional adaption costs for power-generation, domestic and Commercial and domestic sectors
 - These additional costs would be grossly disproportionate to any savings from reduced nitrogen balancing requirements for higher WN gases
 - Estimated adaption costs of €900m to €4,100m for domestic sector in equipment servicing, maintenance and reduced appliance life-expectancy
- HSE noted OBAN study as justification for increasing upper WN limit but concluded it wasn't feasible to apply the OBAN safeguards in a national change to WN
 - Any mitigation safeguards to maintain safety should be included in legislation



5. Rejection of moving GQ from GSMR

- Maintaining GQ in the GSMR: HSE noted the proposed veto the HSE would have to future changes of the proposed IGEM gas quality standard, however:
 - The HSE legal advice indicated that the power of veto was not legally possible
 - Not being able to rely on a legal power was a concern to the HSE, as it had the potential for safety standards to be diminished in future revisions to the IGEM standard
 - Also noted delays to changing GQ arrangements were due to need to gather evidence, rather than amending legislation –
 - Moving GQ to an IGEM standard wouldn't solve issue



5. Next steps

- Next steps: HSE has gone to public consultation on the other changes:
 - HSE consultation closes on 21 March 2022
 - May need to await the HSE report on the public consultation process before receiving clarity on the next steps
 - HSE Consultation indicate that any GSR changes may come into force in Oct-22, but transitional arrangements may be required initially?
- HSE Consultation details given below:
 - GNI would encourage market participants to fill-out the relevant HSE questionnaire to ensure that any remaining concerns are brought to the attention of the HSE
 - GNI happy to have one on one discussions with industry participants to discuss issues where required
 - https://consultations.hse.gov.uk/hse/cd291-revision-gas-safety-management-regulations/





5. Gas Quality – Renewable Natural Gas

5. Gas Quality – Renewable Natural Gas

 GNI is considering parameters for oxygen and CV for biomethane entry points on the Transmission Network

- 3rd party analysis will soon be completed
 - This will be followed by an internal (GNI) review and follow up with industry dates TBD
- Current estimated commissioning date for Mitchelstown CGI is late 2023/early 2024





- Proposal to amend Code of Operations to transfer Capacity Overrun Charge revenues to allowed revenues
- Consultation period for proposal and legal text complete
- After CRU review GNI confirmed at the CMF Meeting on 16 December that the proposal does not extend to SPC overruns. The final legal text was being circulated for clarification with a review completion date of 21st January 2022. One clarification query was received and answered
- GNI have now issued Code Modification A107 seeking an amendment to the Code of Operations to delete annual caps on non-SPC Capacity Overrun Charges



 Proposal to amend Code of Operations to transfer Scheduling Charge revenues to allowed revenues

Consultation period for the proposal and legal text complete

Under review by CRU



 Proposal to remove redundant terminology from Code of Operations arising out of A103 (Removal of balancing tolerances)

Under review by the CRU.



 Proposal to amend Code of Operations to delete now redundant reference references to the Kinsale Field

Issued with associated text and explanatory memorandum on 5 October 2021

• An updated version of the legal text was circulated after the Meeting on 15 December with a submission date expiring on 28th January 2022. No queries/submissions were received



- Proposal to delete Entry Point Transfer Provisions from Code of Operation
- Issued by GNI on 10 January 2022 with Explanatory Memorandum
- Rationale; these provisions were incorporated in an era of long term capacity products when there was the prospect of a new indigenous gas source (Corrib). The provisions are now irrelevant as;
- 1. A new gas source (i.e. an offshore gas field and associated facilities) is a remote prospect
- 2. There is now a new capacity regime with short term products
- 3. The only other Entry Points are IP Entry Points and the transfer provisions are only available for unbundled IP Capacity



- Proposal to delete from the Code of Operations annual caps on non-SPC Capacity Overrun Charges
- Issued by GNI on 10 February 2022 with Explanatory Memorandum
- Rationale There is no realistic prospect of Shippers breaching these caps due to;
- 1. The introduction of Daily Capacity Products
- 2. The calculation pf Capacity Overrun Charges by reference to the Daily Capacity tariff
- 3. The reduction of the overrun charge multiplier
- 4. The extended Capacity Booking Window



12. Status of Code Modification Proposals

| Number | Title of Proposal | Proposer | Status |
|--------|--|----------|---------------------|
| A099 | CNG Supply Point Capacity Setting | GNI | In abeyance |
| A101 | Extension of Daily Exit Capacity Booking Window | ESB | Completed |
| A104 | Transfer Capacity Overrun Charge revenue to allowed revenues | GNI | Under review by CRU |
| A104A | Transfer Scheduling Revenues to allowed revenues | GNI | Under review by CRU |
| A103A | Removal of redundant terminology from Code arising out of A103 | GNI | Under review by CRU |
| A105 | Redundant references to Kinsale Field from Code | GNI | Under review by CRU |
| A106 | Delete Entry Point Transfer provisions from Code of Operations | GNI | Under review |
| A107 | Delete non-SPC annual caps on Capacity Overrun Charges | GNI | Under review |





13. Disbursement Account Query Adjustment

13. Industry Questionnaire responses

4 Shippers responded to the Industry questionnaire

Question 1

- (a) Do you want existing calculation regime to remain
- (b) Do you want average monthly imbalance price to calculate the charge for relevant months
- (c) Other

RESPONSES

All four Shippers preferred the (b) option with one Shipper stating that the relevant charge should be appropriated to each corresponding month



13. Industry Queries (cont.)

Question 2

Should a proposed change be applied

- (a) retrospectively and, if so, from when
- (b) in the future, and, if so, from when

RESPONSES

- 2 Shippers said in the future in one case from 1 February 2022 and the other from date of approval of Code Modification Proposal implementing the change
- 2 Shippers said retrospectively in one case in alignment with FAR Reconciliation timelines and in the other case on the basis of fairness for punitive outcomes



13. Industry Queries (cont.)

Question 3

Should any change be incorporated in the Code of Operations

RESPONSES

All four Shippers were positive with three of them stating that it would be important to ensure certainty going forward with the other Shipper stating that while it felt that it was not strictly necessary it could see the benefit of it being included in the Code.





14. Gas and Electricity Interaction



AOB.1-Textual Changes On New Version Of The Code

• Memo on intended textual, grammatical and numbering changes to issue with a review expiry date of 28th January 2022.

Proposed to keep review open



AOB Items 2 and 3 – SPC Charging Review and Next Meeting

GNI had internal workshop involving relevant teams and further meeting planned

• Next meeting, on 13th April will, subject to revised guidelines, will be a physical meeting at the Ashling Hotel, Dublin.



15. Code Modification Forum Meetings in 2022

Next Meeting



| CMF Dates 2022 | Location |
|--|--------------|
| 16 February 2022 (Wednesday) | Zoom Meeting |
| 13 th April 2022 (Wednesday) | Dublin |
| 15 th June 2022 (Wednesday) | Cork |
| 17 th August 2022 (Wednesday) | Dublin |
| 19 th October 2022 (Wednesday) | Dublin |
| 14 th December 2022 (Wednesday) | Dublin |





Thank you for your participation