

Code Modification Forum Agenda Wednesday,18 October 2023

Hybrid Meeting at The Dean Hotel

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	5	10:40-10:45
4.	Gas Quality – Proposed Changes Update- UK	5	10:45- 10:50
5	Code Modification Proposal A113 – Amendment to Code of Operations to amend gas quality requirements at Entry Points	10	10:50-11:00
6.	Gas Quality- Proposed Changes Update-Renewable Natural Gas	5	11.00-11:05
7.	Code Modification Proposal A111- Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network	15	11.05-11:20
8	Code Modification Proposal A109 -Amendment to Code of Operations to specify the basis of calculation of charge in respect of an adjustment to a metered quantity (Metered Quantity Adjustment). For Mention	5	11:20-11:25
9.	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	10	11:25 - 11:35
10.	Status of Code Modification Proposals	5	11:35-11:40
11.	GNI Presentation on Shipper system imbalance positions	10	11:40-11:50
12.	Gas and Electricity Interaction	5	11:50- 11:55
13.	NGEM Exercises -GNI Presentation Update	5	11:55-12:00
14.	Biomethane for Shrinkage update	5	12:00 -12.05
15.	AOB Items / Next Meeting	5	12.05- 12.10

Microsoft Teams meeting

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Click here to join the meeting Meeting ID: 355 100 734 280

Passcode: AtxqwM



Code Modification Forum

Minutes of Hybrid Meeting in The Dean Hotel, Cork – 18 October 2023



1 Introduction:

The Transporter opened the meeting and referred to a fifteen-item <u>Agenda</u> and the accompanying <u>Slide Deck</u>.

2 Standing Items

2.1 Approval of minutes of previous meeting

The Minutes of the CMF meeting of 16 August 2023 were issued on 6 October. These minutes were accepted.

2.2 Review of action items

Action Item C572 and C575 will remain open, please refer to slide 4 for more detail. A further Action Item C576 was undertaken by the Transporter who agreed to give a high-level overview of the intended operational/business arrangements for the proposed Mitchelstown CGI at the next CMF.

2.3 GNI Scheduled Maintenance Update

The Transporter referred to Slide 5 which detailed that it does not plan to undertake any maintenance activities during the Gas Year 2023/24 which will interfere with gas flows.

2.4 Gas Quality Update

Michael Crowley, Asset Policy & Performance Manager at the Transporter, presented an update on UK Gas Quality developments, referring to slides 6 to 8. Mr. Crowley finished the presentation by reemphasizing the Transporters willingness to help Shippers with any queries they or their OEMs may have on this matter.

3 Biomethane Update

Padraig Fleming, Biomethane Commercial Manager at the Transporter, gave a verbal update on the biomethane for shrinkage proposal. Mr. Fleming detailed how the Transporter is looking at two potential contracts (virtual and physical) for the tenders. After an analysis of the UK market where both contracts are available, it was noted that the physical contract was preferred by bigger users and the virtual contracts (CFD) were preferred by the smaller producers. Mr. Fleming confirmed that it was the Transporter's preference only to submit one of these contract types to the market.

An industry representative detailed that he will endeavor to engage with the Transporter, but stated he was unclear with what the Transporter's objectives are and how these objectives fit with challenges that are currently facing the biomethane industry. Mr. Fleming responded that they are still engaging with industry to try creating a detailed roadmap for the proposal and encouraged all interested parties to contact them directly with any queries or suggestions. Mr. Fleming emphasized the fact that the open channels of communication between industry and the Transporter will not be available once the formal procurement process begins.

The Regulator referenced a slide that Transporter presented at the June and August CMFs which detailed timelines for the proposal implementation and mentioned that it might be useful to build on the steps outlined in this slide to provide more detail for the forum. The regulator also mentioned that it might be useful to have a working group under the CMF to discuss this proposal in more detail. The Transporter was concerned about setting up a subgroup and stated that they would be more than happy to reach out to all interested parties individually. The Transporter referenced the fact that they were considering certain parties' commercial confidentialities at this stage in the process.

In response to this an industry representative suggested a workshop followed by a consultation process where feedback can be anonymized. The Transporter agreed to consider this but still feels that it would get more out of bilateral conversations.

A representative from the power generation sector stated that the ability to import Green Certs may have the ability to de-risk a certain element of the contact. Mr. Fleming responded that the Transporter has not ruled out the importation of Green Certs, but their preference is to have indigenous production.

4 Code Modification Proposals

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

Yvette Jones, the Transporter's Renewable Gas Project Manager gave an overview of Code Modification Proposal A111, referring to slides 12 to 15. Ms. Jones outlined that, in addition to the submissions referred to, an additional large energy user has engaged in relation to the proposal and that the Transporter has been having further one to one discussion with interested parties. She also stressed that the Transporter have offered further discussions to other large energy users as required. The Transporter has suggested to extend further discussion on this proposal out to the next Code Modification Forum Meeting in December. A representative from the electricity industry said they would be happy for this to go out to December but also felt that this would only be useful to them after their OEMs have finished their study. The Regulator asked for a more detailed plan on this code modification mainly regarding timelines, which the Transporter agreed to provide.

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 17 to 19. The review of this Proposal would continue in tandem with the GMARG Forum.

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

Following on from his presentation on UK Gas Quality developments, Michael Crowley, Asset Policy & Performance Manager at the Transporter also presented an update on Code Modification Proposal A113, referring to slides 9 and 10. In response to Mr. Crowley's presentation, a representative from the power generation sector stated that they are currently engaging with their OEMS but there is an extended timeframe to get their OEMs to finish their engineering studies. The representative said they wouldn't be able to make a final judgment on the effects of the proposal until they would have sight of their OEMs report. The review of this modification would continue to the next Forum Meeting in December

4.4 Status of Open Code Modification Proposals

Number	Proposal	Proposer	Status
A099	CNG Supply Point Capacity Setting	GNI	In abeyance
A111	A111 Proposed increase on oxygen limit for biomethane entry points on the transmission network		Under Review
A112	A112 Amendment to Supplier of Last Resort provisions		Under Review
A113	Amendment of Gas Quality Standards at Entry Points	GNI	Under Review

5 Other Agenda Items

5.1 Gas and Electricity Generation

There was no presentation made at this agenda item.

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

Aidan Bugler, Network Operations Emergency Response Manager at the Transporter, gave an update on emergency exercises Bridgid and Everest, referring to slides 24 to 30. In relation to exercise Everest Mr. Bulger reported that the Transporter successfully contacted the majority of LDM end user contacts and stated that they needed to follow up on the remainder they were unable to contact. A Shipper Representative offered the Transporter assistance in getting the appropriate contact details for LDMs they failed to contact.

A representative from the power generation sector asked whether the Transporter make any assumptions in their exercise on secondary fuels. Mr. Bugler detailed that the Transporter did make some assumptions around the ability to fuel switch but did point out that logistically EirGrid have detailed that it may be impossible to refuel some of these large energy users.

5.3 Shipper Imbalance Report

Stephen O'Riordan, Wholesale Market Manager at the Transporter presented on a proposal brought forward to the CMF offering a report detailing anonymized Shippers imbalanced positions referring to slide 21. The Transporter would be surveying Shippers over the upcoming period to gauge interest in this proposal.

5.4 Demand Assessment Reports for Incremental Capacity at IPs

Kieran Quill, Senior Market analyst at the Transporter gave an update on the demand assessment reports for Incremental Capacity at IPs referring to slide 34.

6 Any Other Business

None

7 Next Meeting

The next meeting is a virtual meeting scheduled to take place via Teams on the 13th of December.

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
C576	Transporter to give a high-level overview of the intended operational/business arrangements for the proposed Mitchelstown CGI	Transporter	18/10/2023	Commenced (update at next CMF)
C577	Transporter to provide a more detailed plan around A111, mainly focusing on	Transporter	18/10/2023	Commenced (update at next CMF)

	timelines ahead of the December CMF			
C578	Transporter to have continued discussions with large energy users on A111 before the December CMF	Transporter	18/10/2023	Commenced (update at next CMF)
C579	Transporter to build on steps outlined in Biomethane for Shrinkage slide presented in July and August CMFs	Transporter	18/10/2023	Commenced (update at next CMF)
C580	Transporter is also to discuss proposed workshop with relevant partners on Biomethane for Shrinkage followed by potential anonymized consultation process. The consultation process will be subject to internal GNI approval.	Transporter	18/10/2023	Commenced (update at next CMF)
C581	Transporter to circulate draft Process document on A109 for industry review	Transporter	18/10/2023	Ongoing

9 Calendar of meeting for 2023

CMF Date	Location
14 February 2023 (Wednesday)	Virtual
26 April 2023 (Wednesday)	Ashling Hotel Dublin/Hybrid
21 June 2023 (Wednesday)	Clayton Hotel Cork/ Hybrid
16 August 2023 (Wednesday)	Virtual
18 October 2023 (Wednesday)	Hybrid – physical location to be confirmed
13 December 2023 (Wednesday)	Virtual

10 Attendees

Name	Organization	
Conor Murphy	GNI	
Kieran Quill	GNI	
Ryan O'Connell	GNI	
Stephen O'Riordan	GNI	
Danny Mills	Electric Ireland	
Bill Boucher	Electric Ireland	
Gearoid Fitzgearld	GNI	
Kim Kennington	Manx	
Chris Ward	Manx	
Darragh Kyne	GNI	
Martin Regan	Marex	
Kat Mucha	Centrica	
Jason Herbert	EAI	
Paul Murphy	ESB	
William Carr	ESB	
Cailean Campbell	Flogas	
Michael Crowley	GNI	
Mark White	Vermilion	
Stephen O'Hare	GMO	
Keith Deacon	Axpo	
David Grainger	BGE	
Therese Lannon Crean	SSE	
Brian McGlinchey	Vermilion	
Tom Nolan	Ormond	
Bryan Hennessey	Flogas	
Harry Molly	Tynagh	
Sean McParland	Energia	
Claire Walsh	Centrica	
Emmanouil Mavroudis	Ceres	

Andre Von Muhlen	Vermilion
Aidan Bugler	GNI
David Horan	Augunish
Yvette Jones	GNI
Douglas O'Brien	GNI
Nicholas Lincon	Nephin
Suzanne Linehan	GNI
Sean Mac a Bhaird	CRU
Emerson O'Callaghan	CRU
Stephen English	GMO-NI
Sam Clutterbuck	Nephin
Michael Crowley	GNI
Sean McParland	Energia
Ian Mullins	BGE
Emerson O'Callaghan	CRU
Sean Mac a Bhaird	CRU
Conor Lupton	OFX
Irene O'Donovan	OFX



Code Modification Forum

Wednesday, 18 October 2023 – Hybrid Meeting at The Dean Hotel, Cork

Agenda



- Review of minutes from last meeting/ meeting of 26 April 2023
- 2. Review of open actions
- 3. Update on Maintenance Plan
- 4. Gas Quality Proposed Changes Update- UK/ Renewable Natural Gas
- 5. Code Modification Proposal A113- Amendment to Code of Operations to amend gas quality requirements at Entry Points
- 6. Gas Quality Proposed Changes Update- Renewable Natural Gas
- 7. Code Modification Proposal A111- Amendment to Code to increase oxygen limit for biomethane entry points on transmission network
- 8. Code Modification Proposal A109 –Amendment to Code of Operations to specify the basis of calculation of charge in respect of an adjustment to a metered quantity (Metered Quantity Adjustment). For mention
- 9. 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 revise arrangements around Supplier of Last Resort invoicing
- 10. Status of Code Modification Proposals
- 11. GNI Presentation on Shipper system imbalance positions
- 12. Gas and Electricity Interaction
- NGEM Exercises GNI Presentation Update
- 14. Biomethane for Shrinkage Update
- 15. AOB Items / Next meeting

1. Review of minutes from last meeting



Minutes of CMF meeting of <u>16 August 2023</u> were issued on 6 October.

2. Review of open actions



ID	Action	Responsibility	Status	Priority
C572	Transporter to monitor on ongoing basis the adequacy of the initial 25% tolerance 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

In relation to C575 the Transporter has made a Data Analysis Presentation to the CRU with a proposed rolling average SPC setting methodology. The Transporter is presently preparing responses to subsequent CRU queries

3. 2023/2024 Maintenance Days



GNI DOES NOT PLAN TO UNDERTAKE ANY MAINTENANCE ACTIVITIES DURING THE GAS YEAR 2023/2024 WHICH WILL INTERFERE WITH GAS FLOWS. SIGNINFICANT CAPITAL WORKS ARE PLANNED FOR BRIGHOUSE BAY COMPRESSOR STATION DURING THE SUMMER WHICH WE'LL COMMUNICATE TO THE MARKET CLOER TO THE TIME ONCE PLANNING IS COMPLETED.

ANY MAINTENANCE ACTIVITIES ON GNI INFRASTRUCTURE/EQUIPMENT RELATING TO THE BELLANABOY ENTRY POINT WILL BE CO-ORDINATED WITH PLANNED MAINTENANCE SHUTDOWNS BY THE CORRIB OPERATOR.



4. GB Gas Quality Update Code Modification Forum Update

Update on GB Gas Quality



- GNI has formally submitted Code Modification A113: Amendment of Gas Quality requirements at IP etc
 - Reduce lower WOBBE limit from 47.2 to 46.5 MJ/m3
 - Replace Incomplete Combustion Factor (ICF) and Soot Index (SI) with a Relative Density (RD) limit ≤ 0.7
 - To realign these gas quality parameters with the equivalent values in the amended Gas Safety Management Regulations (GSMR) in Great Britain (GB)
- Published supporting documentation to the Modification proposal:
 - Supporting Memo: Briefly outlines rationale of Health & Safety Executive (HSE) decision in GB & why GNI is recommending equivalent changes in Republic of Ireland (ROI)
 - Together with an independent review of the safety of these changes by DNV
- GNI is happy to facilitate further one on one consultations with any market participants who would like to discuss the
 proposed changes in more detail

Communication with Industrial Users



- Some larger customers will use gas for industrial processes:
- Operation and maintenance of this equipment is normally based on Original Equipment Manufacturer's (OEM) guidelines
- If Modification proposal is approved GNI would encourage Shippers to advise any industrial customers to contact their OEM
 - Ask the OEM whether they would advise of any changes to their guidelines and recommendations, as a result of the reduced WOBBE limit
 - o Difficult to provide generic guidance to these customers, need to consult with their OEM
- GNI will be happy to support Shippers if their customers have any queries on the matter



5. Code Modification A113

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

Code Modification Proposal A113



- GNI has issued on 11 August 2023;
- Code Modification Proposal A113
- Memorandum of Explanation
- Supporting Memorandum to the Proposal
- Impact Assessment of changes to UK Gas Safety (Management) Regulations

Industry Review proceeds to CMF Meeting on 18th October



6. Gas Quality – Renewable Natural Gas

7. Code Modification Proposal A111 -**Amendment to Code of Operations to increase** oxygen limit for biomethane entry points on transmission network



Code Modification Proposal A111- Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network



Issued and circulated on 15 June 2023

Documents issued with Code Modification Proposal

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

Update on review process

- Submissions/Queries furnished in advance of CMF Meeting of 16 August as per following slides 14 and 15
- Review extended to CMF Meeting on 18 October to allow GNI to respond to submissions and to engage in meetings as required
- GNI responded to the three submissions specified in Slides 14 and 15 and have had subsequent correspondence and a
 meeting with the Industry Representative.
- There has been no responses /submissions from any other stakeholders

Code Modification Proposal A111 Submissions



Three submissions were received by COB on 11 August

2. Industry Representative

- Refers to Directive 2009/73/EC and requirement for member states to "take concrete measures to assist the wider use of biogas, the producers of which should be granted non- discriminatory access to the gas system". Further refers to Transporters' requirement to grant non- discriminatory access to the network system to third parties under the provisions of its Licence.
- Refers to the situation that the Distribution Network has an upper oxygen limit of 1.0% mol in contrast to this Proposal
 which envisages an upper oxygen limit of 0.5% mol and requires explanation in view of the conclusion of the Penspen
 Report which states that "The report does not identify any significant safety impacts /material change resulting from an
 upper oxygen increase to 1.0% mol".
- Considers that RNG produced at a facility having an oxygen limit of >0.5% mol but <1.0% could be injected into the Distribution Network (and possibly at some future date be reverse compressed onto the Transmission Network) in circumstances where it has been rejected for injection into the Transmission network
- Considers that the Proposal has been framed in a manner which will inhibit the development of the renewable gas sector in Ireland and seeks clarity and responses on a number of specified issues
- Considers that a single upper oxygen limit should apply to all RNG Entry points

Submissions - continued



2. **Shipper Representative**

Stated that its best estimate for completing an engineering study on gas turbines will take up to 6 months (resource constraint with similar studies being carried out and requests that this timescale be taken into account in review.

3. Electricity Association of Ireland

EAI broadly welcomes the changes but has concerns and requests that the proposed change is approved on a long timeline to afford its members prevent reducing design and working life of generator assets and to ensure that generators are compliant to both environmental regulations and equipment warranties. If approved this will be a whole system change and will require each gas plant to call upon OEM teams to assess the changes and implement equipment upgrades

Code Modification Proposal A109 -**Amendment to Code of** Operations to specify t basis of calculation of the basis of calculation of charge in a metered quantity adjustment

Meter Data Cleanse Process



8. Code Modification Proposal A109



Instruction and Rationale issued

Draft Ancillary document - GNI Monthly Meter Data Cleanse Process submitted to CRU

GNI to circulate (after clearance from the CRU) the draft Process document with the amendments raised by CRU marked up



 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.



Code Modification A112 - Supplier of Last Resort



4 SoLR documents previously issued at Code Mod Forum:

- A draft SoLR Procedure;
- Code Modification SoLR Proposal A112;
- Supporting Memorandum of Explanation; and
- Proposed drafting for Code of Operations PART F (Administration).

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.

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

10. Status of Code Modification Proposals



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A099	CNG Supply Point Capacity Setting	GNI	In abeyance
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A112	Amendment to Supplier of Last Resort provisions	GNI	Under Review
A113	Amendment of Gas Quality Standards at Entry Points	GNI	Under Review

Shipper Imbalance Report



- Proposal brought forward to the CMF offering a report detailing anonymized Shippers imbalanced positions.
- In order to gain access to this report Shippers will have to;
 - Opt in to be included in the report
 - Agree to share balancing data with GNI
- The format of the report will ensure that data is anonymized and that Shipper positions in the report are scrambled at the start of every month.
- There will have to be a minimum of 10 Shippers signed up for this report to be set up.
- GNI will issue a survey in the coming weeks to gauge interest levels in this report.



12. Gas and Electricity Interaction



13. Security of Supply (SoS) / NGEM Update

August 2023

Emergency Exercise Update



Contact: emergencyplanning@gasnetworks.ie

Emergency Exercise Update to CMF/GMARG



Two exercises have been recently carried out:

Exercise Brigid – 14th September 2023

• Exercise Everest – 3rd, 4th & 5th October 2023

Exercise Brigid 14/09/2023



- Led by EirGrid
- Participants: EirGrid, ESBN, GNI, NORA, CRU & DECC
- National Emergency Coordination Group (NECG) convened in the NECC (Dublin); chaired by DECC
- Testing interaction between electricity, gas & secondary fuel
- Testing government dept. response via the NECG
- Communications and media response incl. 'live' press conference
- Follow on from 2022 Exercise Dara
- Exercise report in progress

Exercise Everest 3/4/5 October 2023 (1)



- Scenario lead by Network Emergency Coordinator (NEC) in GB
- GNI lead the ROI, NI & IOM response
- Used real-time demand data for the 3 days
- Supply curtailment due to 'extraordinary' events in GB
- Gas Emergency Response Team (GERT) met 5 times during the exercise
- GERT members: GNI, EirGrid, ESBN, NORA, CRU & DECC
- Industry messaging via GTMS

Exercise Everest 3/4/5 October 2023 (2)



- Load shedding of gas-fired powergen in ROI, NI & IOM (on Day 2)
 - ROI fuel mix for electricity was 25% gas due to windy conditions
 - Secondary fuel switching simulated (following testing by EirGrid)
 - No electricity supply interruption
- GNI simulated load shedding of LDM industrial customers (on Day 2)
 - Successfully contacted majority of LDM end user contacts
 - Need to follow up on remainder unable to contact

Exercise Everest 3/4/5 October 2023 (3)



- No interruption to Corrib gas supply was simulated
- NDM demand < indigenous gas supply
- No interruption of supply to the 'protected' customer segment (as per EU Regulation)

Exercise feedback and report in progress

Contact: emergencyplanning@gasnetworks.ie



Thank you



14 Biomethane/Shrinkage Code Mod Forum Update

Padraig Fleming



15. AOB / Next Meeting

Next Meeting



Next Meeting is virtual and scheduled for 13 December

Demand Assessment Reports for Incremental Capacity at IPs



- Under the provisions in Article 26 of the CAM Network Code, transmission system operators at either side of an Interconnection Point (IP) shall, in each odd-numbered year, cooperate in the process of assessing market demand for incremental capacity.
- GNI and National Gas at the Moffat IP and, GNI and GNI(UK) at the North/South (Gormanston) IP have engaged in the market demand assessment process
- Incremental Capacity Notice with Expressions of Interest for both IPs were published in advance of the Assessment Window which ran from 3rd July to 28th August
- No Expressions of Interest were received and the respective Demand Assessment Reports for each IP will be published in advance of 23 October 2023

Code Modification Forum Meetings in 2023



CMF Date	Location
14 February 2023 (Wednesday)	Virtual
26 April 2023 (Wednesday)	Ashling Hotel Dublin/Hybrid
21 June 2023 (Wednesday)	Clayton Hotel Cork/ Hybrid
16 August 2023 (Wednesday)	Virtual
18 October 2023 (Wednesday)	Hybrid – Dean Hotel Cork
13 December 2023 (Wednesday)	Virtual

Next Meeting



Thank you for your participation