

# Code Modification Forum Agenda

Wednesday, 24 April 2024

Hybrid Meeting, Ashling Hotel

Time: 10:30

<u>No.</u>	<u>Item</u>	<u>Duration (minutes)</u>	<u>Time</u>
1.	<i>Review of Minutes from last meeting</i>	5	10:30 - 10:35
2.	<i>Review of Action Items from last meeting</i>	5	10:35 - 10:40
3.	<i>GNI Scheduled Maintenance Update</i> - <i>Operational Maintenance</i> - <i>ILI South North Pipeline</i>	10	10:40 - 10:50
4.	<i>Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network</i>	5	10:50 - 10:55
5.	<i>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</i>	5	10:55 - 11:00
6.	<i>Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points</i>	5	11:00 - 11:05
7.	<i>Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,00kWh as LDMs</i>	5	11:05 - 11:10
8.	<i>Status of Code Modification Proposals</i>	5	11:10 - 11:15
9.	<i>Update on Wholesale Gas Market Management Incident Management (WGMIM) Plan</i>	5	11:15 - 11:20
10.	<i>GNI Meter Data Cleansing Policy Document</i>	5	11:20 - 11:25
11.	<i>Gas and Electricity interaction</i>	5	11:25 - 11:30
12.	<i>GNI Sustainability Presentation</i>	15	11:30 - 11:45
13.	<i>GNI Presentation on the 10-year Network Development Plan</i>	25	11:45 - 12:10
14.	<i>Biomethane Update</i>	20	12:10 - 12:30
15.	<i>AOB Items/ Next Meeting</i>	10	12:30 - 12:40

# Microsoft Teams meeting

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Passcode: kwPun2

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Gas  
Networks  
Ireland

# Code Modification Forum

Minutes of Hybrid Meeting- 24 April 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 14 February 2024 were issued on 28 February 2024. These minutes were approved.

### 2.2 Review of Action Items

Action Items C572, C575, C579, C584, C587 & C589 will remain open, while Action Items C588 is now complete. Further Actions items C590 & C591 were undertaken by the Transporter, more detail of which can be found in Section 8.

### 2.3 GNI Scheduled Maintenance Update

Kieran Quill, Senior Market Analyst at the Transporter, presented on Planned Maintenance, referring to Slide 8. Mr. Quill 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.

Liam Murphy, Interconnector Operations Manager at the Transporter, presented an update on the ILI South North Pipeline inspection plan referring to slides 10 to 12. At the end of his presentation Mr. Murphy responded to questions as to the origin of dust uncovered in the inspection and as to the likelihood of a Pipeline Inspection Gadget ('PIG') getting stuck in the pipeline.

In response to a Regulator query on the motivation for the inspection Mr. Murphy stated that the Transporter is not looking for anything in particular and is just carrying out the process as part of the normal 15-year inspection cycle. The Regulator also queried who was bearing the cost of the increased transportation costs involved in flowing gas up the South North pipeline. Stephen O'Riordan, Wholesale Market Manager at the Transporter, indicated that this project is predominantly an NI issue, that it has a narrow and defined timeline, and the Transporter would

be reimbursing the relevant Shipper/s. Mr. O'Riordan concluded by detailing that the Transporter is happy to discuss this offline with the Regulator.

Following Mr. Murphy's presentation, Brendan McCarthy, Project Delivery Lead at the Transporter presented an overview on the planned Brighthouse Bay Station splitting project, more detail of which can be found on slides 15-20. Mr. McCarthy requested that Shippers nominate their most accurate volume intentions on the 6<sup>th</sup> to 8<sup>th</sup> June when there would be an 8-hour outage. Comms would be issued to Shippers Operation Desks in the matter nearer the event. Further updates on the project would be given at upcoming Code Modification Forum meetings.

## 3 Biomethane Update

### 3.1 Update on Mitchelstown CGI

Stephen O’Riordan, Wholesale Market Manager at the Transporter, gave an update on the Mitchelstown CGI project, referring to slides 52 & 53. In response to the presentation an industry representative queried whether the Transporter planned to undertake a formal consultation process regarding the business rules for the Mitchelstown CGI. Mr. O’Riordan stated that the business rules are going to be in place to inform related Code Modification Proposals and that the Transporter would have to consult with the Regulator about any potential consultation process. The industry representative wanted a formal request for a consultation on the business rules to be noted and requested engagement with Biomethane producers on the formulation of the business rules in advance of a consultation. Mr. O’Riordan said that he would consider all of the industry representative points before the planned Biomethane workshop at the June CMF.

Finally, the industry representative expressed his dissatisfaction with the Transporter about the progression of the Ormonde Organics transmission system Entry Point at Portlaw and requested assistance from the Regulator. The Transporter responded that construction for the project has commenced but is more than happy to discuss any concerns offline. The Regulator welcomed any submissions from industry about timelines regarding any of the ongoing Biomethane projects & Code Modifications. The Regulator also detailed that they are still looking for a more detailed plan regarding timelines around the Mitchelstown CGI from the Transporter.

### 3.2 Biomethane for Shrinkage Update

Padraig Fleming, Biomethane Program Delivery Manager at the Transporter, gave a verbal update on the Biomethane for Shrinkage proposal. Mr. Fleming stated that the Transporter met the Regulator the day before the CMF (23/04/2024) and that the Regulator is currently awaiting more information to be provided on the subject by the Transporter. Mr. Fleming said that the Regulator have requested that the Transporter consider a number of points and that they will continue their engagement throughout the coming weeks.

An industry representative stated that he did not believe that the Biomethane for Shrinkage proposal required the need for any changes to the Code of Operations and indicated that producers were more than willing to enter negotiations for the supply of biomethane in this area. Mr. Fleming responded that, for the foreseeable future, biomethane is going to be more expensive than natural gas and that the potential implications of this pass-through cost to the consumer must be considered by both the Transporter and the Regulator. Mr. Fleming stated that the Transporter is planning a comprehensive workshop on Biomethane at the June CMF and encouraged industry participants to attend and to forward the meeting invitation to relevant parties within their organization.

## 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 23 to 25. He indicated that the industry review stage is currently open until the 1<sup>st</sup> of June. The Transporter has issued a note and survey out to industry about gauging sentiment for potentially extending the industry review dates for Code Modification [A111](#).

### 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 Slide 27. Mr. O'Brien also stated that he had a call with the Retail team at the Regulator to explain points of discussion between the Transporter and the SOLR and how these issues might be resolved. Mr. O'Brien also noted that the Transporters' Trading and Settlements team are currently reviewing how they manage their billing process in the event of a cyber security attack and that he is hopeful that a lot of this work could be leveraged in the event of a SOLR.

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

Kieran Quill, Senior Market Analyst at the Transporter and Michael Crowley, Asset Performance Manager at the Transporter, gave an overview of Code Modification Proposal A113 along with an update from the GSMR, referring to Slides 29 and 30. In response to the update the Regulator queried whether the Transporter is pressing National Gas on the publication of real time gas quality updates from St. Fergus and queried whether National Gas would share information with the Transporter if they were hesitant in sharing information more widely.

The Transporter agreed to take an action item and opened Action Item C590. Mr. Crowley stated that he has already formally tabled the request to National Gas that industry in Ireland would like the publication of real time data from the terminal. Mr. Crowley also stated that National Gas have not committed to sharing data even though some of the power generators have raised a similar request. The Transporter also noted suggestions from a member of the electricity industry and the representative from the EAI regarding the potential for prior warnings from the UK about changes to Wobbe gas levels and potentially looking at EU and UK trade cooperation agreements as a way of advocating for the sharing of data for real time gas quality changes.

The Regulator questioned that even if the Transporter could get access to real time data in order

to monitor gas quality changes coming from St. Fergus, how useful this information actually would be. Mr. Crowley responded that he believed that this data could afford the Transporter the opportunity to give warning to industry about potential changes coming in gas quality from GB.

A representative from the electricity industry expressed his frustration with the issue and stated that he would more than willing to work with other industry participants to advance the matter. Another representative noted that the gas flowing to Ireland at the Moffat IP was entirely influenced by what is flowing from St. Fergus and queried whether there was any expected timeframe when that might change due to Hydrogen/biomethane injection. Mr. O’Riordan, Wholesale Market Manager at the Transporter, referred to slides 32 to 46 from the [Slide Deck](#) from the last CMF where the Transporter gave a detailed presentation on the upcoming gas quality changes and detailed that the Transporter was happy to discuss these changes offline with any interested parties.

#### 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 Slide 32. The Regulator detailed that they are currently reviewing the Code Modification proposal report and that they will be in contact with the Transporter if they have any queries.

#### 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	CRU Review	To allow industry to make any formal submissions to the Transporter.	TBC	Instruction & Rationale to issue



## 5 Other Agenda Items

### 5.1 Gas and Electricity Generation

Jason Herbert, Policy Analyst at the Electricity Association of Ireland, provided a verbal update on timelines of their OEM process regarding Code Modifications [A111](#) and [A113](#). Mr. Herbert detailed that these reports are currently being undertaken by their members but does not envisage all the reports being completed by the June deadline for industry review and stated that the end of summer is a more realistic deadline. Mr. Herbert also detailed that any modifications required from the OEM reports will have to be factored into any timelines. He also suggested that any plants having commercially sensitive issues resulting from their respective OEM reports contact the Transporter directly.

The Transporter questioned whether all the Generators will have their OEM reports completed by the end of the summer. Mr. Herbert responded that he is confident that he will have some of the reports but not all of them. The Regulator queried whether all the members of the EAI have an appointment slot with their OEMs. Mr. Herbert confirmed that all the EAI members that he had talked to had contact with their OEM.

The Regulator also queried the negative impacts of the Power Generators receiving gas that was out of spec with their equipment. Mr. Herbert stated that potentially this would result in plants having to shut down for maintenance.

The Regulator asked the Transporter to express its concerns regarding this topic. In response, Mr. O’Riordan stated that the Wobbe Index changes comprised in [A113](#) were going to be implemented by the UK on or after 1 April 2025 and the Code of Operations would have to align with these changes or Ireland could have a security of supply issue.

In relation to [A111](#) the Transporter had ongoing discussions with producers who are looking to connect to the system by the end of the year and are striving to adhere to government targets relating to Biomethane production. He also stated that the Transporter is cognizant that the CRU safety case team will need time to review any upcoming changes relating to gas quality.

Mr. Herbert noted that that the changes in the Wobbe index are coming regardless but the fact that it is happening in tandem with changes to oxygen levels makes it quite difficult for his members. Mr. Herbert also wanted to acknowledge the high level of engagement provided by the Transporter on this topic and suggested that there is further engagement between the parties on this topic to make sure that the Irish perspective is considered in the UK. Furthermore, the Transporter also wanted to open Action Item C591 which would look at sending a note and survey out to industry about gauging sentiment for potentially extending the industry review dates for Code Modifications [A111](#).

Mr. Herbert also wanted it noted that he had formally raised issues around the potential of cost recovery of OEM reports for his members to the relevant parties. The Regulator responded that they are aware that this letter was sent to the relevant team in their organisation.

## **5.2 Update on Sustainability in GNI & ISO50001 Certification**

Brid Sheehan, Sustainability Engineer at the Transporter, provided an update on Sustainability in GNI & ISO50001 Certification, more detail of which can be found on slides 41 to 48. A Shipper representative commented on the significant increase of Transporter's metered energy consumption between 2013 to 2023 as it now includes all its operations in the ISO5001 Energy Management System Scope and also includes fuel gas.

Along with asking questions regarding the targeted 50% reduction in emissions intensity coming from the EU, the Regulator posed two questions about the presentation (1) whether the Transporter was planning on developing key metrics regarding their sustainability goals & (2) whether the Transporter was planning on publishing more information regarding their sustainability goals and performance.

## **5.3 Presentation on the 10-year Network Development Plan**

Laura Ryan, Senior Future Networks Engineer at the Transporter, provided an update on GNI's 10-year Network Development Plan, referring to slides 51 to 58. Ms. Ryan received questions from a Shipper representative regarding the cost of upgrading compressor stations in order to meet peak day demand and about the potential employment of both pipelines coming from Scotland in order to meet any peak day demand.

## 6 Any Other Business

Stephen O’Riordan, Wholesale Market Manager at the Transporter presented an overview of the Wholesale Gas Market Incident Management (WGMIM) Plan, referring to Slide 36. Mr. O’Riordan outlined that the industry review period for this document ended on the 18<sup>th</sup> April and that the final plan which issued on the 22<sup>nd</sup> of April, included all comments. A representative from the electricity industry queried the need to update the National Gas Emergency Plan (NGEP) so that it points to the relevance from of the WGMIM.

Kieran Quill, Senior Market Analyst at the Transporter, gave an update on the GNI Meter Data Cleansing Policy document, referring to slide 38. Mr. Quill detailed that a draft of the GNI Meter Data Cleaning Policy document was circulated to the CMF Mailing List on the 8<sup>th</sup> of March with an invitation for queries /submissions up to COB on Friday, 12<sup>th</sup> April. During this review period there was no comments from industry. As requested by the Regulatory, the Transporter agreed to leave the industry review date for this document open to the next CMF.

## 7 Next Meeting

The next meeting is a hybrid meeting is now scheduled to take place **in Croke Park, Dublin on Thursday 13<sup>th</sup> of June**. This was a change from the original planned 12<sup>th</sup> June date which was clashing with the RGFI conference. As indicated above there will be a biomethane workshop on the afternoon of this event and attendees were urged to invite stakeholders in the biomethane sector to this event.

## 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 previous 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
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	Ongoing
C587	Transporter to commence review of the Emergency Section of the code of Operations and provide an update at the next CMF	Transporter	18/10/2023	Ongoing

<b>C588</b>	Transporter to sit down with the EAI to discuss some upcoming gas quality changes	Transporter	14/02/2024	<b>Completed</b>
<b>C589</b>	EAI to give an update on OEM timelines at the April CMF	EAI	14/02/2024	<b>Completed</b>
<b>C590</b>	The Transporter to query National Gas about potentially publishing real time data about gas quality changes coming from the UK	Transporter	24/04/2024	<b>Ongoing</b>
<b>C591</b>	Transporter to issue a notice about potentially extending industry review dates for Code Modification Proposals A111 & A113	Transporter	24/04/2024	<b>Completed</b>

## 9 Calendar of meeting for 2024

Next CMF Meeting



CMF Dates	Location
14 February	Virtual
24 April	Hybrid (Dublin)
13 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
Emerson O’Callaghan	CRU
David Lindsey	CRU
Sean Mac an Bhaird	CRU
David Grainger	BGE
Niamh Gillen	SSE
Therese Lannon Crean	SSE
William Carr	ESB GT
Padraig Fleming	GNI
Brendan McCarthy	GNI
Liam Murphy	GNI
Martin Regan	Marex
Brian McGlinchey	Vermilion
Jason Herbert	EAI
Sam Clutterbuck	CERES
Nicholas Lincon	Nephin
Paul Murphy	ESB GT
Brid Sheehan	GNI
Laura Ryan	GNI
Tom Nolan	Ormond
Mark Goodwin	BGE
Stephen English	GMO
Kio Isenose	SSE
Stephen O’Hare	GMO
Fionn Kelly	GNI
Claire Walsh	Centrica

Bryan Hennesy	Flogas
Paul Hoey	Electric Ireland
Colm Griffen	GMO
Michael Crowley	GNI
Mark Phelan	Electric Ireland
Michael Lawson	ESB
Paul Crowley	GNI
Keith Deacon	Axpo
Ben Cowap	ESB
Cian Fitzgearld	Energia
Kim Kennington	Manx



# Code Modification Forum



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Wednesday, 24 April 2024 – Hybrid Meeting, Ashling  
Hotel

# Agenda

1. Review of minutes from last meeting
2. Review of open actions
3. GNI Scheduled Maintenance Update
4. Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network
5. Code Modification Proposal A112 - Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing
6. Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points
7. Code Modification Proposal A114 - Amendment to Code of Operations to classify Gas Points with a design MHQ of 100,00kWh as LDMs
8. Status of Code Modification Proposals
9. Update on Wholesale Gas Market Management Incident Management (WGMIM) Plan
10. GNI Meter Data Cleansing Policy Document
11. Gas and Electricity Interaction
12. GNI Sustainability Presentation
13. GNI Presentation on the 10-year Network development Plan
14. Biomethane Update
15. AOB Items/End -of -Year Report/Next Meeting

# 1. Review of minutes from last meeting

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- [Minutes](#) of CMF meeting of 14 February were issued on 28 February.

# 2. Review of Open Actions

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## 2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C572	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/03/2019	Ongoing
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/ CRU	25/03/2020	Ongoing
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

ID	Action	Responsibility	Date Raised	Status
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	Ongoing
C587	Transporter to commence review of the Emergency Section of the code of Operations and provide an update at the next CMF	Transporter	18/10/2023	Ongoing
C588	Transporter to sit down with the EAI to discuss some upcoming gas quality changes	Transporter	18/10/2023	Completed
C589	EAI to give an update on OEM timelines at the April CMF	EAI	18/10/2023	Ongoing

# 3. Maintenance Days

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### 3. 2023/2024 Maintenance Days

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- GNI does not plan to undertake any maintenance activities during the gas year 2023/24 which will interfere with gas flows.
- All maintenance activities on GNI infrastructure/equipment relation to the Bellanaboy entry point will be co-ordinated with planned maintenance shutdowns by the Corrib operator.



# ILI South North Pipeline



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Liam Murphy - Interconnector Operations Manager

# 2024 ILI South North Pipeline



## Pipeline Information

Length of Pipeline : 157km

Diameter of Pipeline : 457.2mm 18 Inch

Year of Commissioning : 2006

Last ILI : 2009

## Key Dates

Estimated Mobilisation Date: 24th June 2024

Planned First Launch Date: 29th July 2024

Number of PIG Runs : 3 – Gauging  
/Cleaning/Intelligent

Estimated Duration : 6 Days including  
Contingency

# ILI Route



# Commercial Implications

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- Consistent flow rate required through South North Pipeline to maintain appropriate pig velocity for a successful pig run.
- Relevant Shippers have been engaged with and have agreed to ensure gas is nominated and subsequently delivered at Gormanston IP in place of Moffat IP ( Twynholm) for the duration of this ILI.
- TSO's to ensure impacted Shippers are kept cost neutral for accommodating.

# Questions?



Gas  
Networks  
Ireland



# Brighthouse Bay Station Splitting project Overview

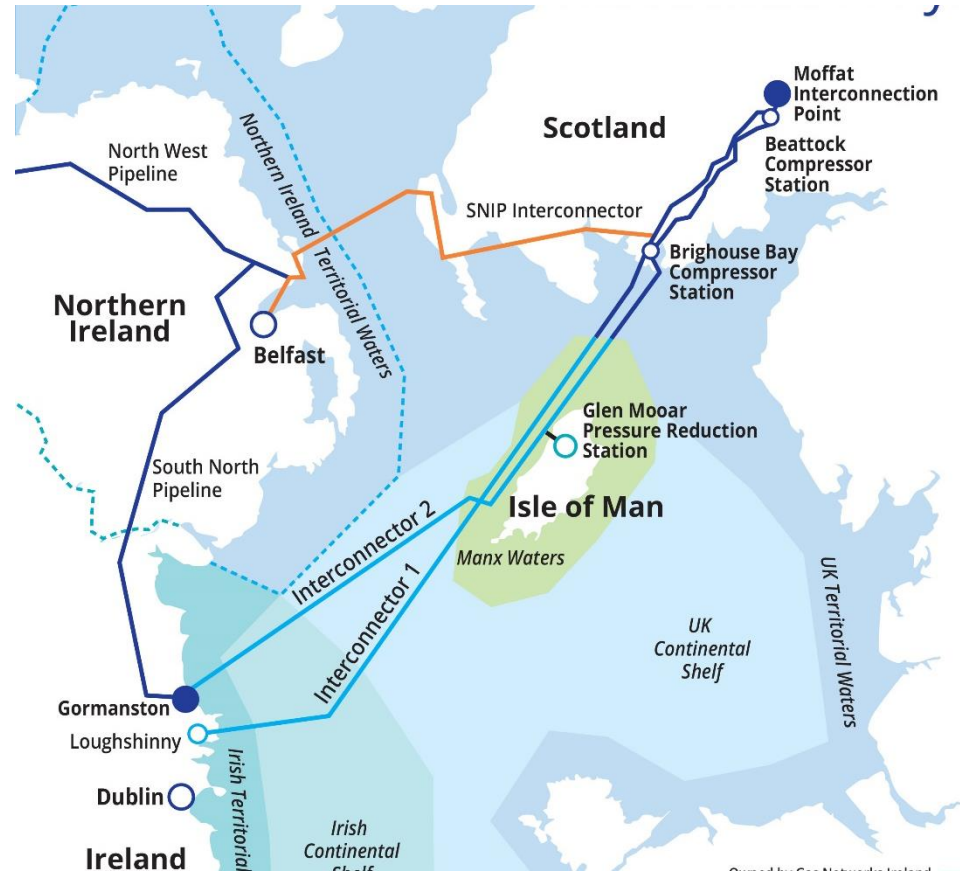


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Brendan McCarthy – Project Delivery Lead

# Introduction

- Brighthouse Bay Station Splitting Objectives and Overview;
- Sample of Project Controls;
- Assistance.



# Brighthouse Bay Station Splitting Project

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- 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.
- Overview provided 14<sup>th</sup> February 2024 to this forum, and presentation to GMO NI on 17<sup>th</sup> April 2024. As indicated previously regular updates would be provided to Code Mod Forum as supply through Brighthouse mainly impacts Rol and Isle of Man.
- 20 phases of work estimated:
  - 10 Non-Routine Operations procedures involving either a 8 hour station outage, or reduced flow through two (of 3) scrubbers, or reduced number of Gas Turbine Units available for short duration (2 days) and in cases combination of above;
  - 10 where works completed during permitted construction works.



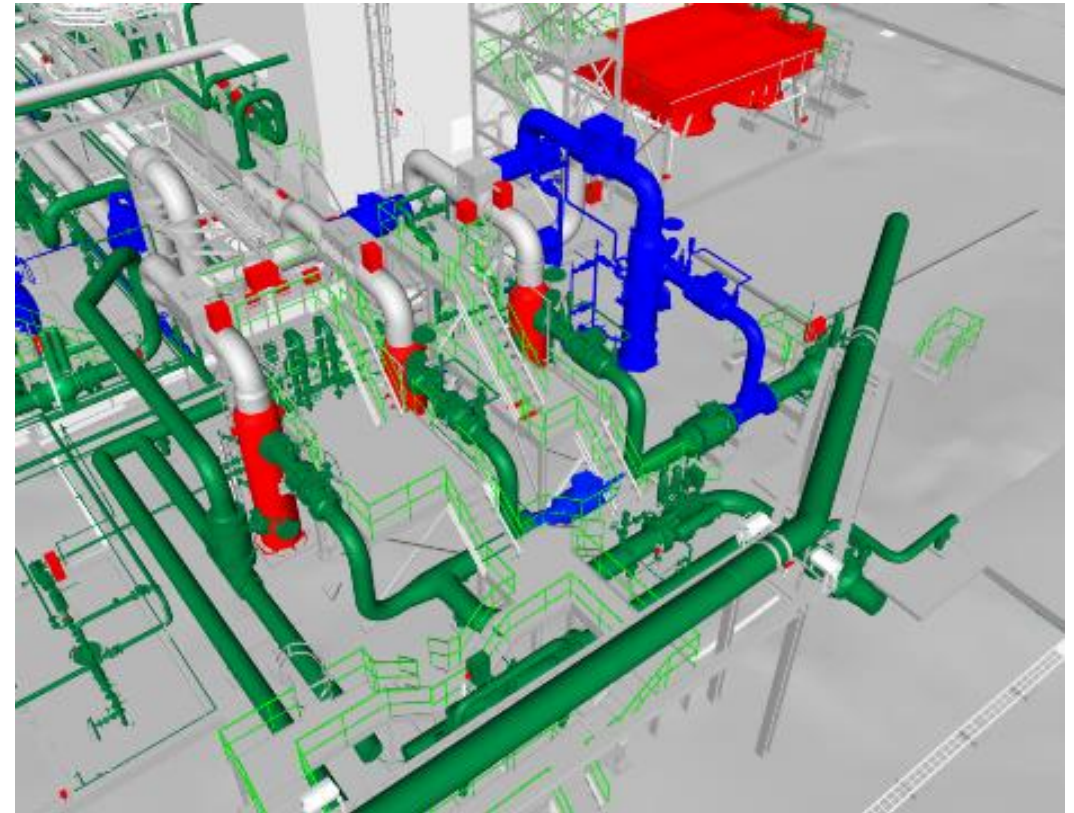
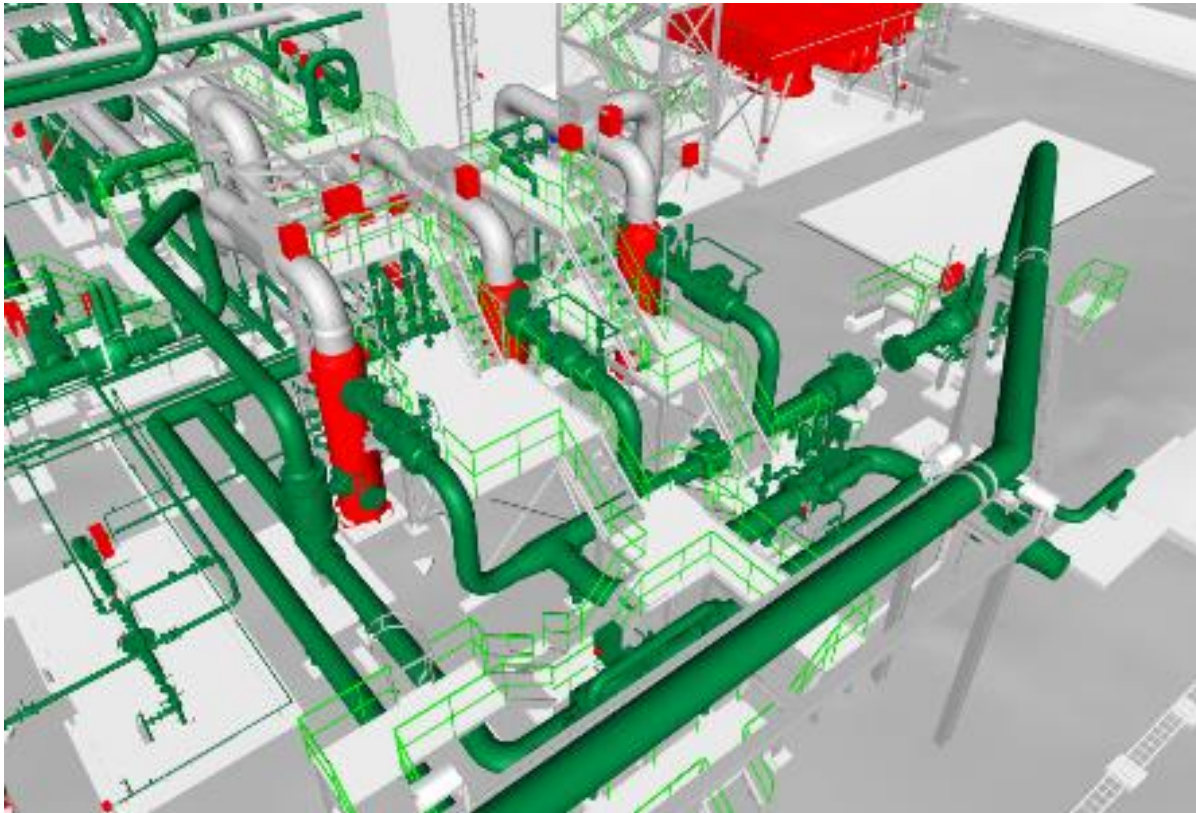
# Project Controls Include

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- Hazard Identification and Constructability Studies completed. Work shops to plan critical phases of works will be ongoing throughout the Project;
- Minimising number of Station outages, all controlled under Non-Routine Operations Procedures;
- Minimising works as much as possible needing completion during periods of Station outages;
- Planning outages using Network Analysis in conjunction with Grid Control. This will consider forecasted demands, and where appropriate weekend working to minimise impact on supply;
- Engagement with other Entry Points on scheduling and planning of works;
- Communications with stakeholders in advance of Non-Routine Operations.

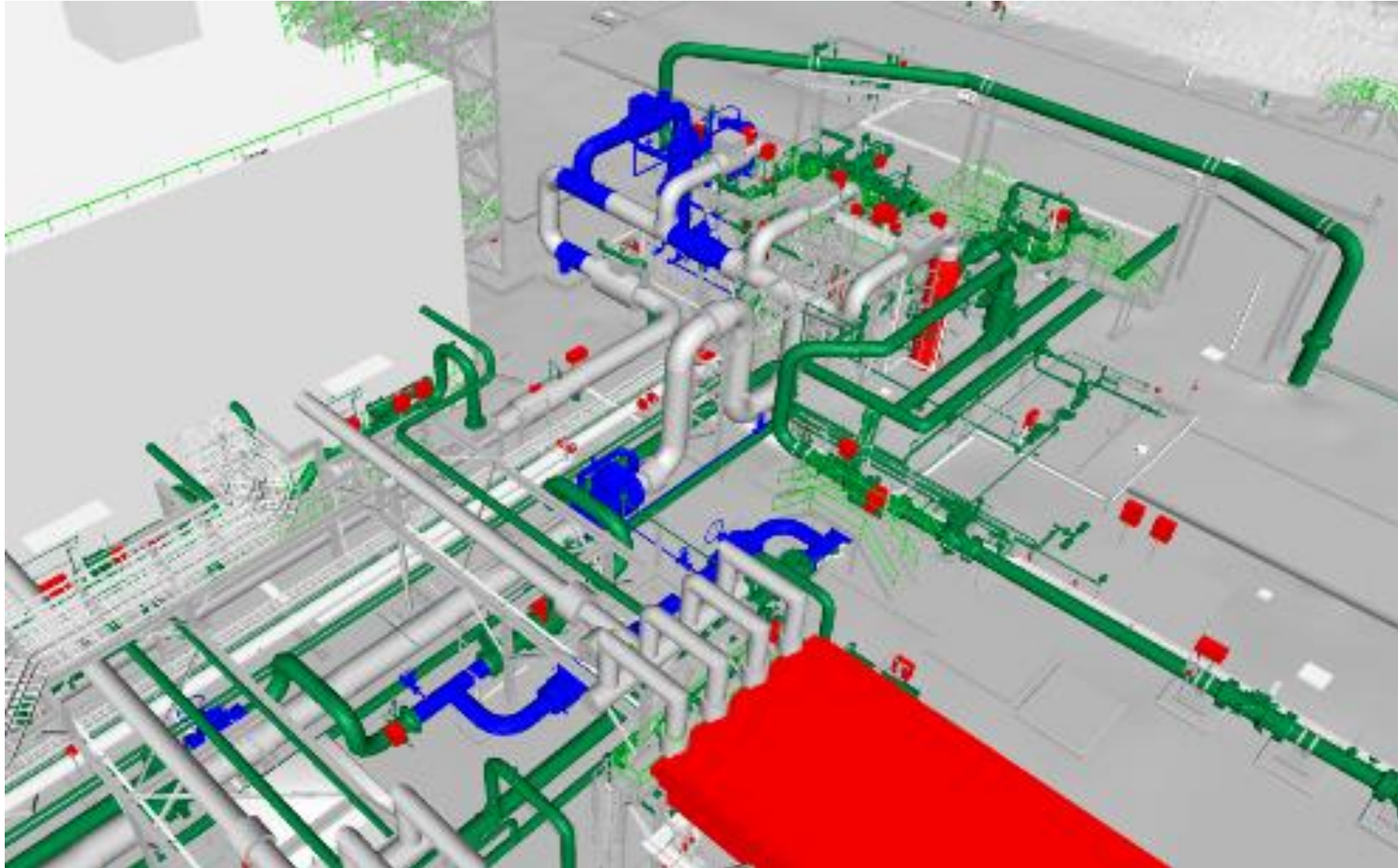
- During certain periods looking for:
  - Nominations as early and realistic as possible on the day. This assists with knowledge of available time for Grid Control and Operations on site;
  - Planning of communications if there is an issue during an outage i.e. if during an outage there is a failure of a component or a leak path which may need immediate repair but outcome may be unable to make up gap in nominations for gas day.
- Status:
  - Pipework being fabricated at present. 4<sup>th</sup> (new) scrubber on site already. 98% materials delivered with remainder due in advance of when needed;
  - 1<sup>st</sup> 8 hour outage followed by availability of 2 scrubbers for 36 hours to compressor trains due 6<sup>th</sup> to 8<sup>th</sup> June approx.; followed by
  - 2<sup>nd</sup> to 5<sup>th</sup> July approx. an 8 hour outage followed by 48 hours period of flow through 2 scrubbers to 3 Siemens Units (Hall 1).

# 1<sup>st</sup> NRO - Inlet Header to New Scrubber 6<sup>th</sup> to 8<sup>th</sup> June





# 2<sup>nd</sup> NRO – Outlet Header of New Scrubber 2<sup>nd</sup> to 5<sup>th</sup> July



# Questions?



Gas  
Networks  
Ireland



# 4. Code Modification Proposal A111



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

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



Issued and circulated on 15 June 2023

Documents issued with Code Modification Proposal can be found [here](#).

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

## Update

- Upper limit for oxygen is **0.2%** for natural gas in Transmission and Distribution Networks
- Renewable Gas (RNG) injected into the Distribution Network has upper limit of **1%**
- Review process ongoing - industry review date extended to 1 June 2024.
- Industry submissions to date can be accessed on slides 42 and 43 on the following [Slide Deck](#).

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

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

- Large energy users requested OEMs carry out analysis on potential equipment impacts
- Industry review period extended to 01 June 2024 to allow completion of OEM analyses
- OEM analyses in different stages of development
  - Some are in progress while others haven't yet started
  - Estimated that OEM analyses won't be complete before 01 June 2024
- GNI plans to commission Mitchelstown CGI in Q1 2025
  - GNI will submit Material Change Notice (MCN) to Transmission Safety Case end of August 2024
  - Oxygen Code Modification will form part of MCN submission
- EAI and GNI met to discuss how best to progress this Code Mod
- Identified three possible outcomes from OEM reports:
  - No potential impacts – Code Mod should be straightforward to progress
  - Mixed responses – more challenging
  - Cannot accommodate – need to look for work around



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

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- GNI proposes that this Code Modification is progressed after 01 June
- The Code Modification Proposal provides that before RNG Entry Points on the Transmission Network can avail of Code Modification, GNI must be of the reasonable End User operational facilities would not be adversely impacted (unless could be reasonably mitigated)
- Code Modification Proposal provides that Entry Points would be considered on a case-by-case basis as circumstance may differ for individual Entry Points depending on capacity and location on network

# 5. Code Modification Proposal A112



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

# 5. Code Modification Proposal A112 – Supplier of Last Resort

Four SoLR documents previously issued at Code Mod Forum can be found [here](#).

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

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

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

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

# 6. Code Modification Proposal A113



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

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



- The Health and Safety Executive (HSE) in the UK has recently approved changes to the Great Britain (GB) gas quality specification in the Gas Safety Management Regulations (GSMR). The relevant changes approved by HSE include the reduction in the lower WOBBE limit to 46.5 MJ/m<sup>3</sup> and the replacement of the Incomplete Combustion Factor and Soot Index with the relevant density limit of  $\leq 0.7$ . 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 6<sup>th</sup> April 2025 (to allow sufficient time for industry to prepare for the change).
- GNI published relevant [Supporting Documentation](#) on the 11<sup>th</sup> 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 A113 - Amending gas quality requirements at Entry Points (GSMR Update)

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- Safety Case assessment of lower WOBBE Index (WI) gas scheduled to commence for end of May-24
- Still obviously awaiting feedback from Original Equipment Manufacturer (OEM) on impact of lower WOBBE Index (WI) on gas turbines in power stations
- Monitoring ongoing Unified Network Code (UNC) enabling modification being progressed by National Gas (NG) in Great Britain (GB):
  - NG is committed to improved data transparency but producers are concerned about commercial sensitivity of publishing gas quality information at Entry Points;
  - Discussion around potential retrospective publication of gas quality data at Exit Points to Gas Distribution Networks (GDNs)
  - Unclear whether it will be possible to get real-time information of lower WI gas entering the National Transmission System (NTS) at St Fergus at this stage?

# 7. Code Modification Proposal A114



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

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

- The Proposal is to classify all Gas Points that have a design maximum hourly quantity of not less than 100,000 kWh classified as LDM pursuant to the Code of Operations irrespective of the Annual Quantity associated for such Gas Points.
- **Rationale for the Proposal**
- Shippers (including Generation Units subject to Central Dispatch) will be able to view hourly data on GTMS and be able to book capacity as required, leading to better trading decisions and enabling them meeting obligations under Part D of the Code of Operations to submit accurate information with respect to Nominations
- GNI system oversight and control is enhanced when receiving accurate nominations with a greatly reduced likelihood of experiencing unexpected substantial gas withdrawals.
- Industry Review closed on 31 January with one submission which supported the proposal.
- Transporter has submitted CMF Proposal Report to CRU with a response to CRU query in relation to prospective tariff/cost implications resulting from the modification.
- **Next Steps:** Proposal remains under 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	CRU Review	To allow industry to make any formal submissions to the Transporter.	14/02/2024	Instruction & Rationale to issue



# 8. Status of Code Modification Proposals

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## 8. Status of Code Modification Proposals

ID	Title	Status	Reason for Status	Status End Date	Next Step
A099	CNG Supply Point Capacity Setting	In abeyance	Awaiting the development of the CNG market and sufficient data to inform the next steps.	TBC	NA
A111	Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network	Industry 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	CRU Review	To allow industry to make any formal submissions to the Transporter.	TBC	Instruction & Rationale to issue

# 9. Update on Wholesale Gas Market Incident Management (WGMIM)

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# 9. Wholesale Gas Market Incident Management Plan (WGMIM)

- The [updated Wholesale Gas Market Management Industry Management \(WGMIM\)](#) plan was issued on the 22<sup>nd</sup> of April and outlines how Wholesale Market stakeholders will be convened in the event of a major incident.
- The Industry Review period closed on the 18<sup>th</sup> of April with all comments included in the updated draft.
- The plan may be implemented in conjunction with The Natural Gas Emergency Plan (NGEP) to provide high **level updates** to wholesale market stakeholders.
- 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.

# 10. GNI Meter Data Cleansing Policy Document

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# 10. GNI Meter Data Cleansing Policy Document

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- A draft of the GNI Meter Data Cleaning Policy document was circulated to the CMF Mailing List on 8th March with an invitation for queries /submissions up to COB on Friday, 12th April.
- During this review period no comments were received from industry.
- The purpose of this Code Procedure:
  - is to outline the process involved in **identifying and resolving metering issues;**
  - carrying out site and stream **meter cleansing to produce cleansed volume;** and
  - energy consumption figures for **accurate billing each month.**

# 11. Gas and Electricity Interaction (Verbal Update)

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# 12. Sustainability in GNI & ISO50001 Certification



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Brid Sheehan – Sustainability Engineer



**Sustainability is “meeting the needs of the present without disturbing the resources for future generations”**

UN world Commission on Environment & Development: Brundtland Commission, 1987



Gas Networks Ireland's vision is to forge a reputation as a credible leader in sustainability. We will achieve this by clarifying and refining how to deliver on a set of simplified and prioritised key objectives.

## Our Vision

### **A credible leader in Sustainability**

## Our Approach

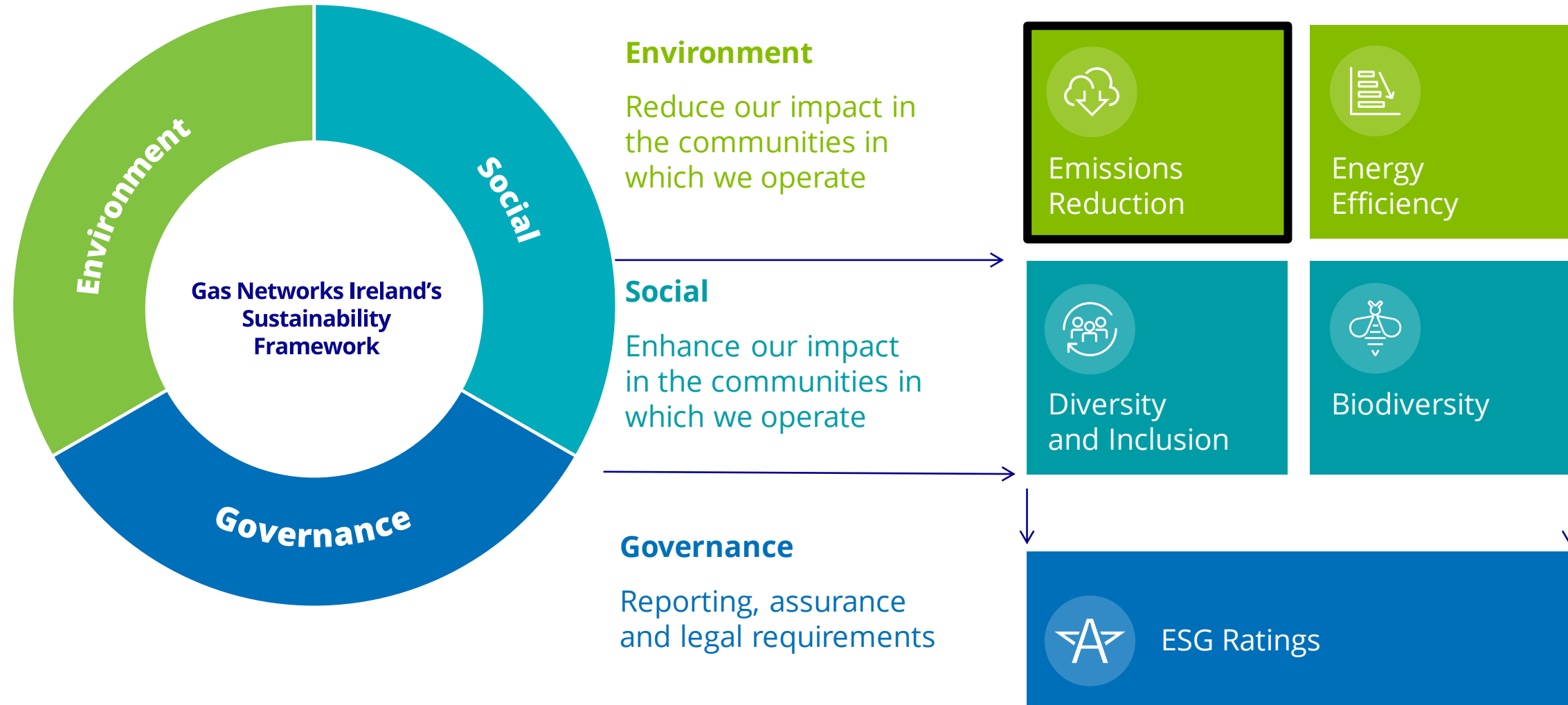
### **Simplify and prioritise key Gas Networks Ireland sustainability objectives**

- Emissions
- Energy efficiency
- Biodiversity
- Diversity and Inclusion
- ESG \*rating

## Our Plan

### **Clarify and refine how we will deliver on those objectives**

# GNI Sustainability Strategy Priorities





# Sustainability Action Plan

## Environment



Emissions Reduction



Energy Efficiency

**Achieve 50% reduction in our emissions intensity by 2030**

- Cease compressors venting
- Electrify compressor turbines
- Refine fugitive emissions data
- Use biomethane for shrinkage gas

**Meet Public Sector energy efficiency target (Facilities & Fleet) – 50% reduction in GHG, 50% improvement in energy efficiency by 2030 (monitored by SEAI)**

- Continue to improve office energy efficiency
- Procure green fleet

## Social



Diversity and Inclusion

**Achieve Biodiversity “net gain” by 2025**

- Refine and deliver the Gas Networks Ireland Biodiversity Action Plan

**Achieve “Elevate Pledge” ambition – to achieve a Gas Networks Ireland workforce that is representative of all members of Irish Society**

- Deliver Gas Networks Ireland D&I Strategy



Biodiversity

## Governance



ESG Ratings

**Achieve credible ESG Ratings**

- Stand up the Gas Networks Ireland Sustainability and Safety Board Sub-committee
- To meet CSRD and NewERA reporting requirements
- To meet legislative requirements e.g. Human rights and modern slavery
- To implement sustainable procurement strategy



# ISO 50001 Energy Management System (EnMS)



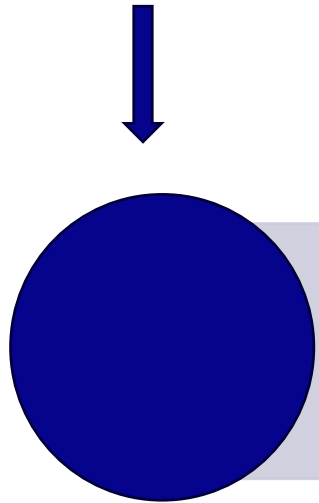
ISO50001 demonstrates an organisations commitment to continual **improvement of energy management.**

Successful implementation of an EnMS supports a culture of energy performance improvement that depends upon commitment from all levels of the organization, especially top management.



# ISO50001 Journey

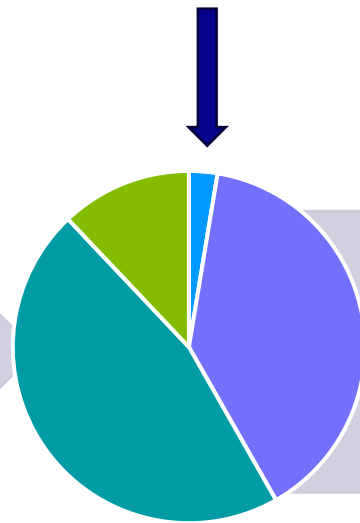
Facilities, Fleet,  
Electricity 100%



- 16Gwh
- Energy

2014

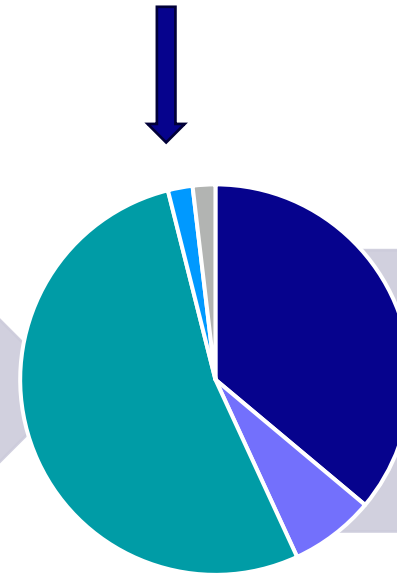
Facilities, Fleet,  
Electricity 3%



- 570 GWh
- Energy

2023

Facilities, Fleet,  
Electricity 2%



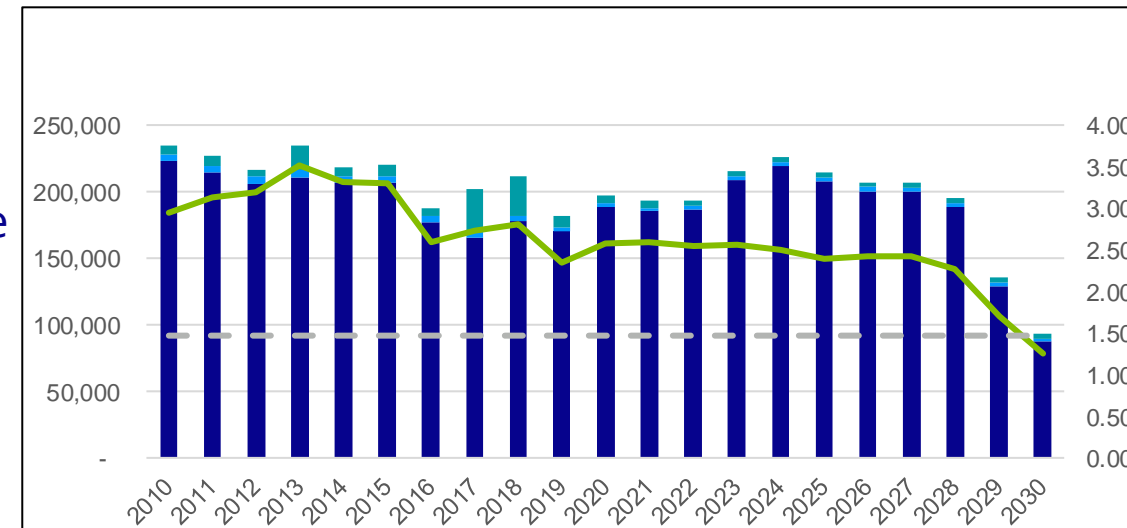
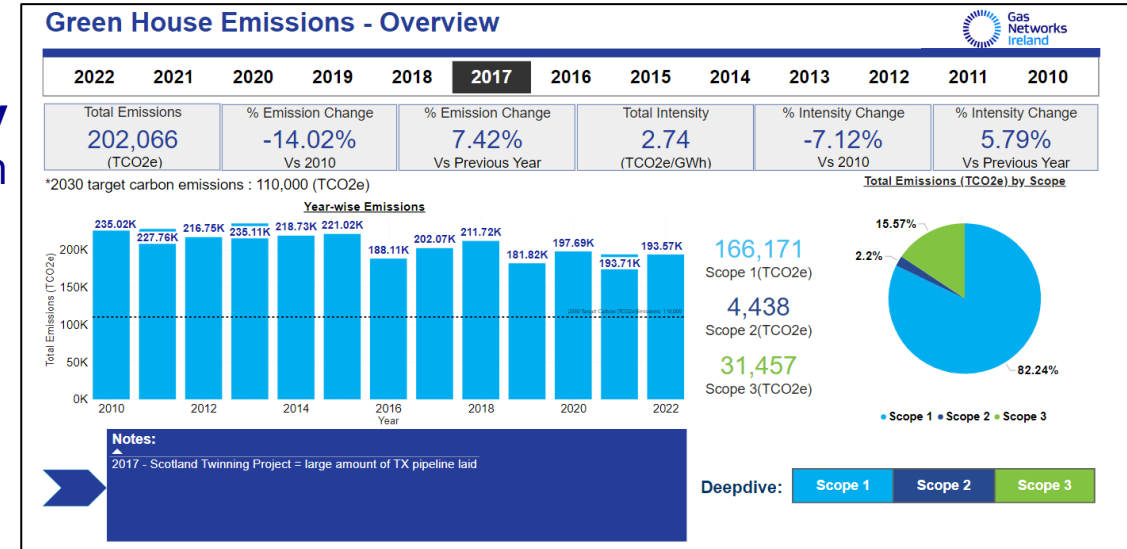
- 193,000 TCO2e
- Emissions

2023

*\*UAG not included here*

# What Did We Do in 2023

- Established a **Reduce Your Use** working group
- Identified key Green House Gas (GHG) and **Significant Energy Users (SEU)** along with the relevant variables, information sources and people who can influence
- Produced 2022 **Energy and Emissions Report**
- **Tracked** commitments/actions
- **Developed an automated emissions dashboard**
- Identified **key Challenges**
- **Audits** including AGI preheating
- **Develop Opportunities Register** and reviewed periodically
- Developed **training and communications** across the business
- Developed a **Glidepath** to demonstrate path to meet targets





# Questions?



**NSAI**

**Certificate of Registration  
of Energy Management System  
to I.S. EN ISO 50001:2018  
Gas Networks Ireland**

**Network Services Centre  
St. Margaret's Road  
Finglas  
Dublin 11  
Ireland**

NSAI certifies that the aforementioned company has been assessed and deemed to comply with the provisions of the standard referred to above in respect of:-

The energy used in the development, design, construction, maintenance and operation of Gas Networks Ireland's gas transportation networks in the Republic of Ireland, Northern Ireland, Scotland and Isle of Man. The management of leak detection for the natural gas distribution network in Republic of Ireland.

*Shirley Kelly*

Appl. No. 18/0001/2018  
Lead - Network Services Centre



Registration Number: 01/0001/2018  
Original Registration: 8 September 2018  
Last assessed on: 21 November 2023  
Valid to: 21 November 2025  
Re-assess valid to: 8 September 2026

This certificate remains valid on condition that the Assessment Certificate Management System maintained in an effective and efficient manner, which is a part of the overall management system. The certificate is issued as part of the assessment process.



All NSAI certificates are listed on NSAI's website - [www.nsi.ie](https://www.nsi.ie). The continued validity of this certificate may be verified under "Certified Company Search".

NSAI (National Standards Authority of Ireland) | South Woods, Northwood, Sandy, Dublin 11, Ireland | 01 844 8440 | [www.nsi.ie](https://www.nsi.ie)

# 13. GNI presentation on the 10-year Network Development Plan



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Laura Ryan – Senior Future Networks Engineer

# Network Development Plan – Annual Process

The primary purpose of the Network Development Plan (NDP) is to assess the gas network's capacity based on a 10-year forecast of supply and demand.

This is to guarantee the adequacy of the gas transportation system and security of supply.



# NDP 2023 - Scenario Assumptions

## Best Estimate

- **Power Gen**
  - EirGrid's **median electricity demand** scenario
  - **80% Renewable Energy Share in Electricity (RES-E)** by 2030
  - CAP23 Renewable Capacity **targets delayed + 2 yrs** (aligned with EirGrid's GCS view)
  - **New gas-fired power stations** connecting out to 2027/28
- **Residential**
  - New connections **declining** out to 2030
  - No. of Residential Disconnections = **75% of CAP23 targets**
- **Industrial & Commercial**
  - Large New I/C connections
  - I/C disconnections **in line with SEAI**
- **Energy Efficiency:** 50% of potential savings (Res & I/C)
- **Transport:** Low Bio-CNG growth
- **Biomethane:** CAP23 target (5.7 TWh), **delay +1 yr**
- **GDP:** 3.7% p.a. on average

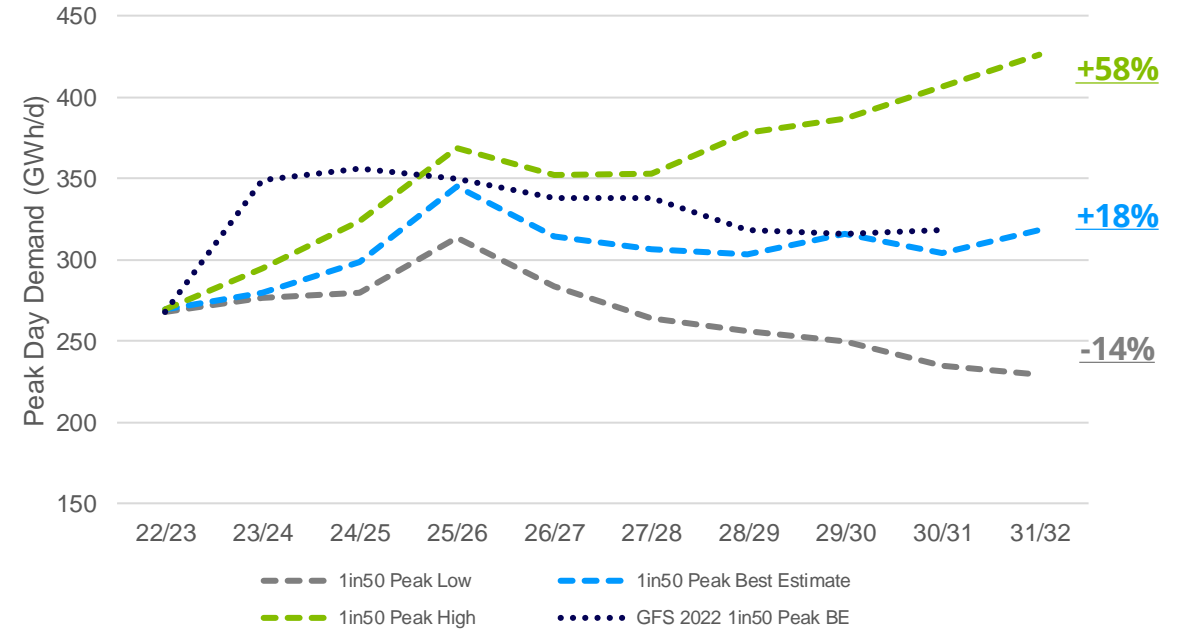
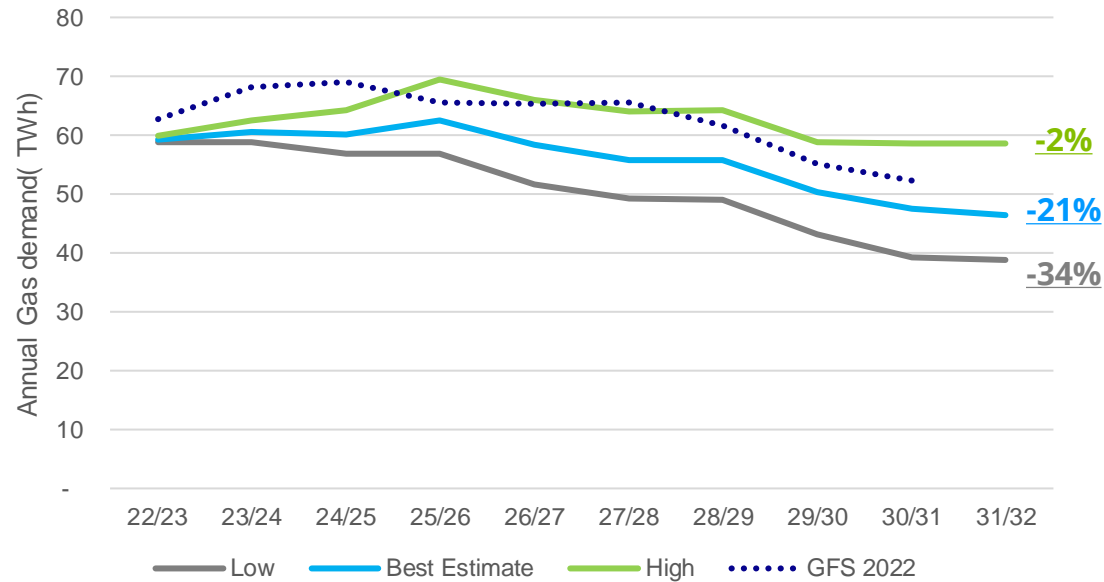
## High Scenario

- Eirgrid's high electricity demand scenario
- Low renewables build-out rate
- CAP23 targets further delayed
- Lower level of gas customer disconnections
- High CNG and biomethane growth

## Low Scenario

- Eirgrid's low electricity demand scenario
- High renewables build-out rate
- CAP23 targets achieved on time
- Higher level of gas customer disconnections
- Low CNG and biomethane growth
- Low GDP growth

# NDP 2023 – ROI Demand Outlook



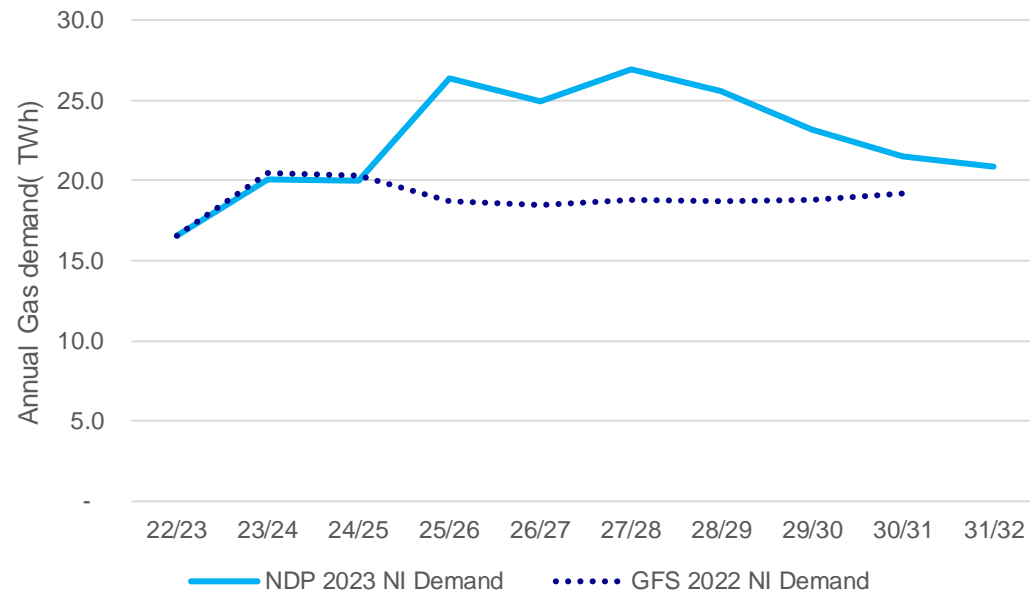
• **Best Estimate Annual Gas Demand 2022/23 vs. 2031/32:**

- Total ROI gas demand: -21%
  - Power Generation: -47%
  - Industrial & Commercial: +29%
  - Residential: -19%

• **Best Estimate Peak Day Demand 2022/23 vs. 2031/32:**

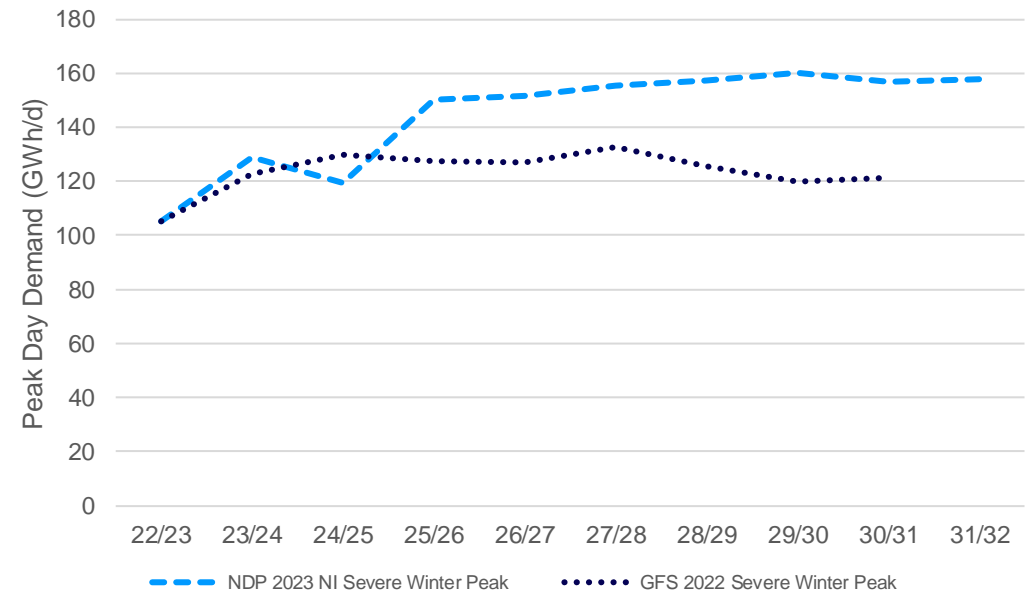
- Severe winter (1-in-50): +18%

# NDP 2023 - NI Demand Outlook



- **Annual Gas Demand 2022/23 vs. 2031/32:**

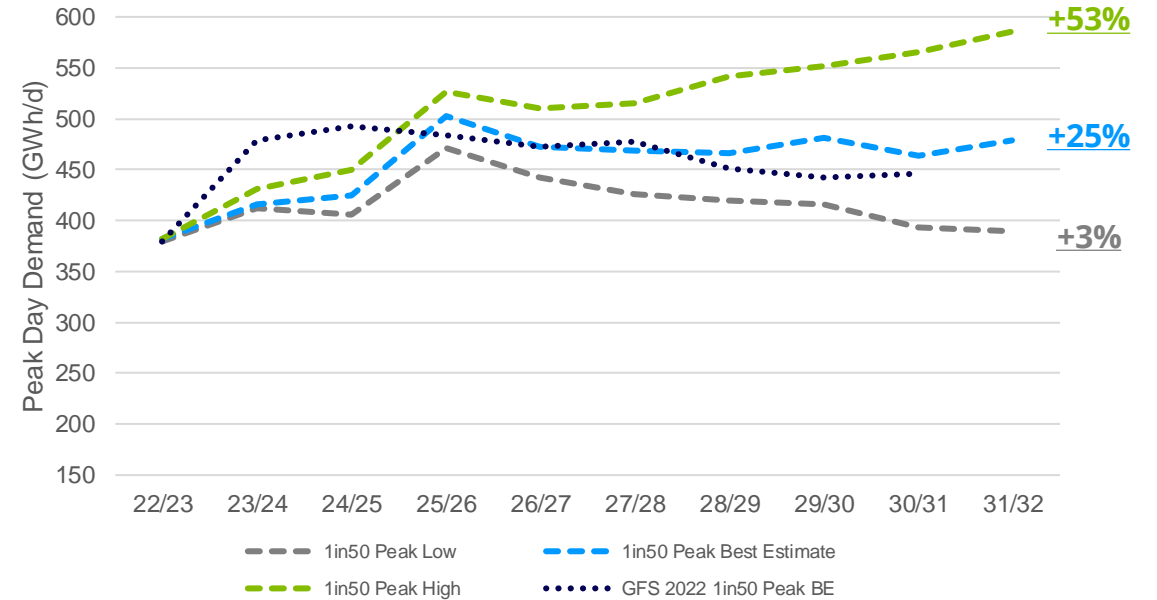
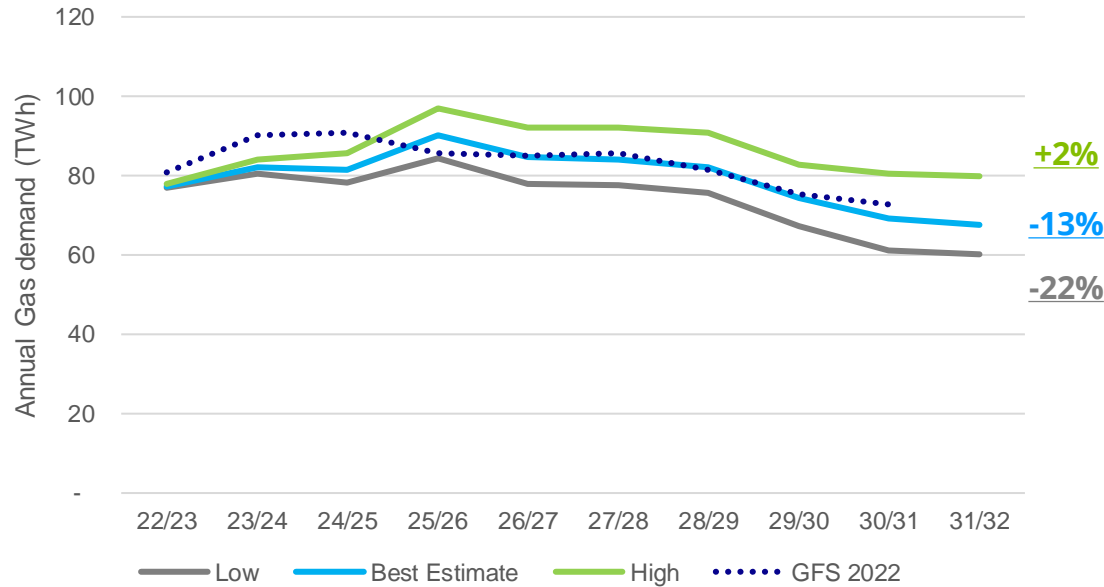
- NI gas demand: +26%



- **Peak Day Demand 2022/23 vs. 2031/32:**

- NI Severe winter (1-in-50): +50%

# NDP 2023 – System Demand Outlook



• **Best Estimate System Annual Gas Demand 2022/23 vs. 2031/32:**

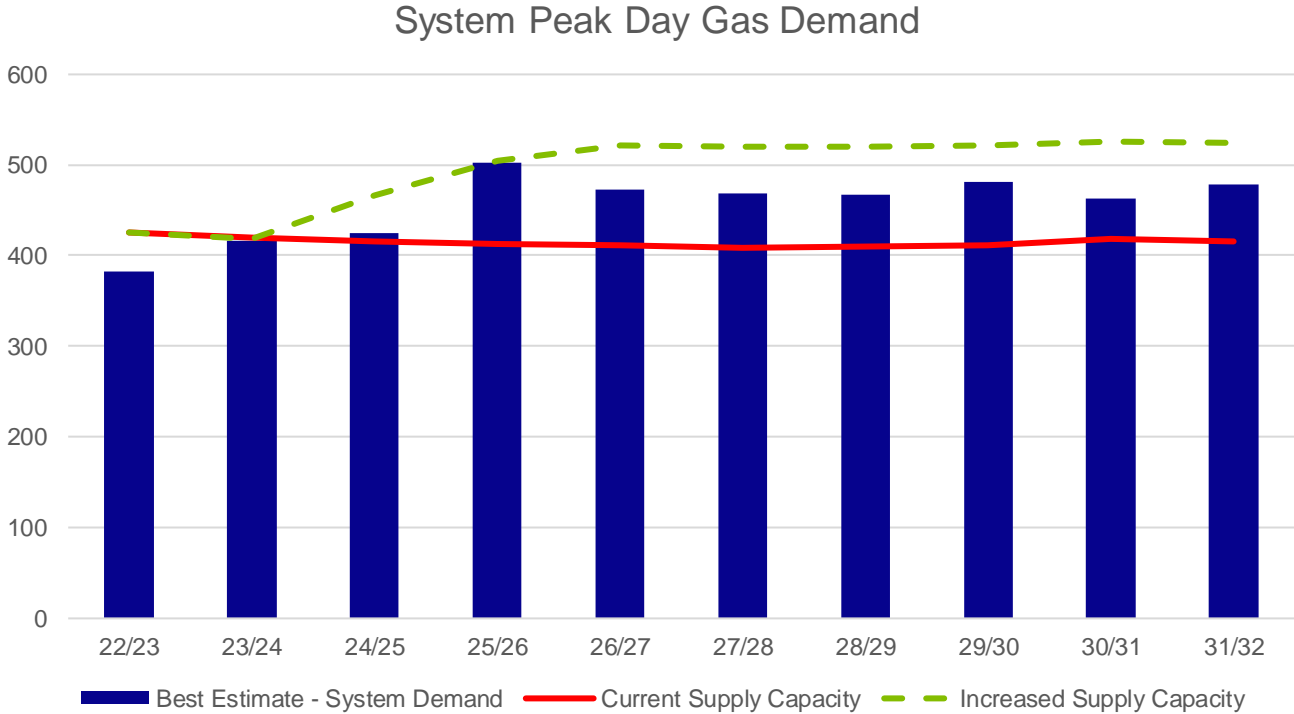
- Total System gas demand: -13%
- ROI gas demand: -21%
- NI gas demand: +26%

• **Best Estimate System Peak Day Demand 2022/23 vs. 2031/32:**

- Severe winter (1-in-50): +25%

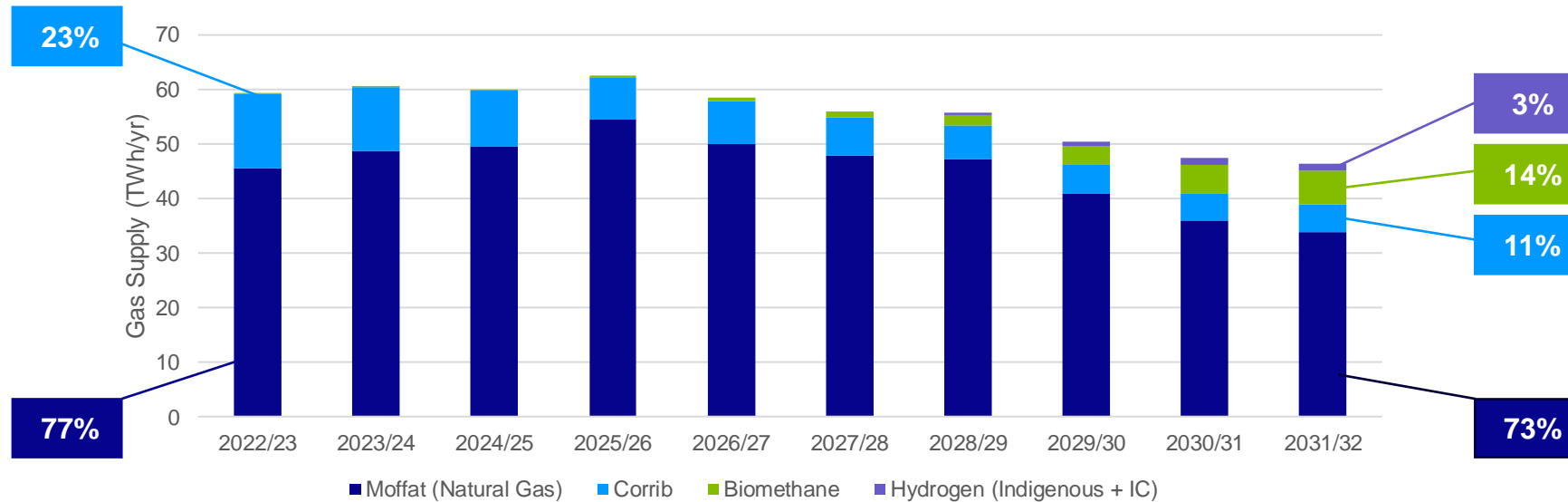
# Network Supply Capacity

- Peak day demand projections exceed the current technical capacity of both Beattock and Brighthouse Bay compressor stations from 2024/25 onwards
- Upgrade works at each compressor station have been identified to meet peak day demands and are progressing in phases over the PC5 period





# NDP 2023 – Supply Outlook

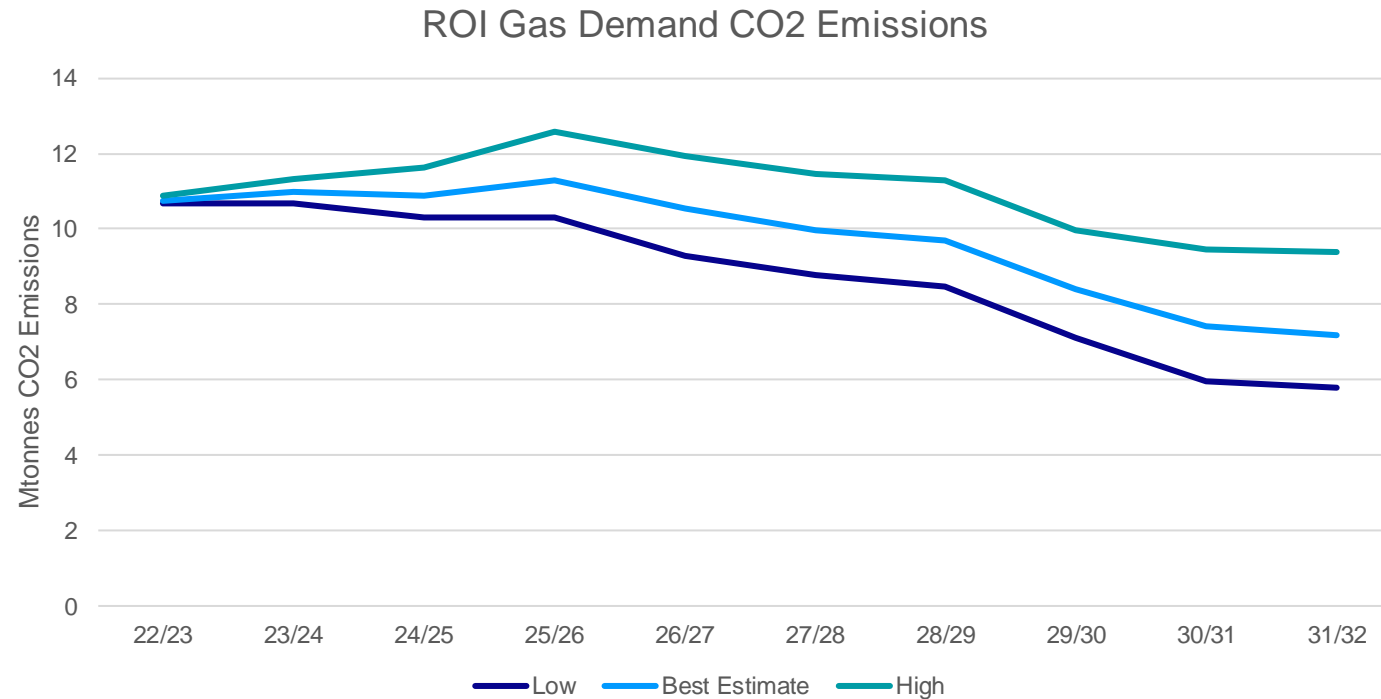


- **By 2031/32:**

- **Natural gas imports** from GB via Moffat are expected to account for **72.7%** of gas supply to ROI
- **Hydrogen** is anticipated to account for **2.8%** of ROI demand, with hydrogen imports via Moffat and indigenously-produced hydrogen each accounting for 0.6% and 2.2% respectively
- **Corrib** is forecast to supply **11%** of ROI demand
- **Biomethane** is expected to account for the remaining **13.6%** of ROI supply

# Carbon Emissions from the ROI Gas Network

- Total carbon emissions from the gas network have been calculated and are shown opposite for each NDP scenario:
  - Best Estimate scenario: **emissions from the gas network fall by -33%** across the NDP period
  - Low scenario: **-46%**
  - High Scenario: **-14%**



The primary purpose of the Network Development Plan (NDP) is to assess the gas network's capacity based on a 10-year forecast of supply and demand. This is to guarantee the adequacy of the gas transportation system and security of supply. Development of the NDP is a licence requirement.

## For the Best Estimate Scenario over the NDP Horizon (to 2031/32)

- Annual ROI gas demand is projected to decrease by 21%
- 1-in-50 peak day ROI gas demand is expected to increase by 18% and will reach its highest point in 2025/26
- Total carbon emissions from the gas network decrease by 33%

## At the end of the NDP Horizon

- Natural gas imports from GB via Moffat are expected to account for 72.7% of gas supply to ROI
- Corrib is anticipated to account for 11% of the ROI supply mix by the end of the NDP horizon, 2031/32
- Biomethane is expected to account for 13.6% of ROI supply with Hydrogen supplying the remaining 2.8%

**Phased capacity upgrades at both compressor stations in Scotland are being delivered to meet the projected 1-in-50 peak day demands**

# Questions?



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# 14. Biomethane Update

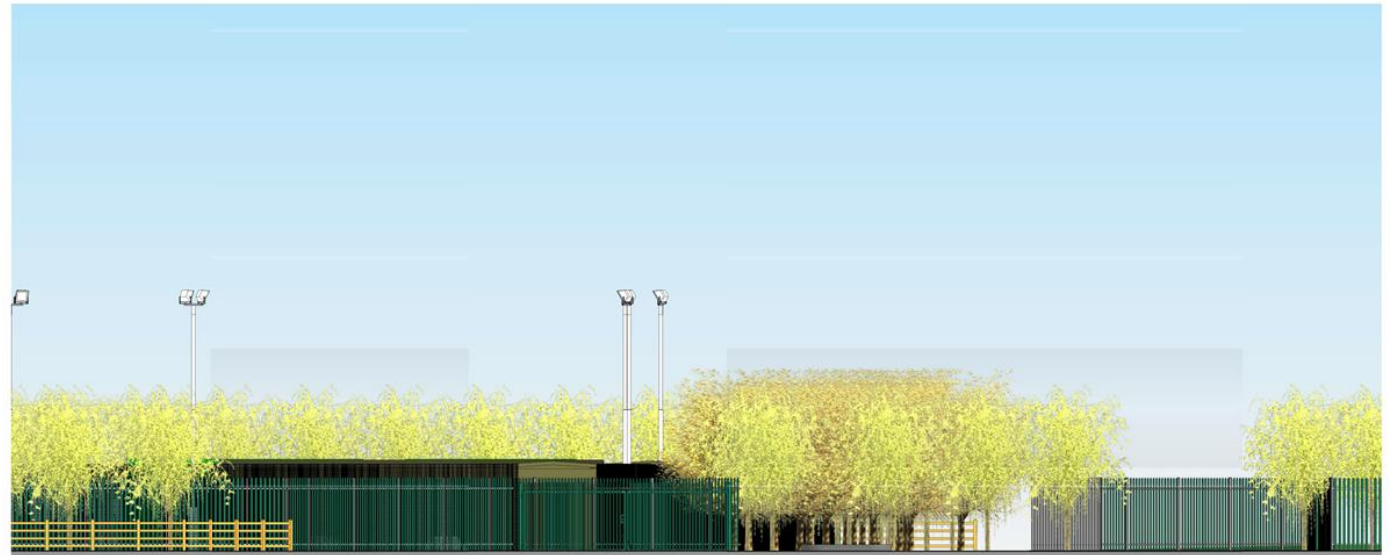
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# Mitchelstown Central Grid Injection (CGI) Update

## Key Deliverables

- CGI build with 175 GWh per annum injection capacity
  - Potential for 700 GWh per annum injection capacity
  - Equates to 12% of Irish Government's 2030 biomethane production target
- Customer contribution recovery models
- Contract 175 GWh customer biomethane
- Safety Case acceptance



# Mitchelstown Central Grid Injection (CGI) Update cont'd

**Commissioning Date** - Q1 2025

**Design** - Key equipment design freeze end of April

**Construction** - Start date September 2024

**Commercial** - Customer contribution charges under approval review

**Regulation** - Code of Operations requirements being identified

**Safety Case** – MCN documents & risk assessments underway for submission end of August

**Business Rules** - Under development

**Legal** - Contractual framework for CGI being drafted

**Systemisation** – Requirements being scoped

**Operational** – Procedures being developed



# 15. AOB Items/Next Meeting

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# 15. Next Meeting

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- Next Meeting is hybrid (Croke Park Dublin) and scheduled for 13 June.

# 15. Code Modification Forum Meetings in 2024

**Next CMF Meeting**  


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

**Thank you for your  
participation**

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Networks  
Ireland**