### Code Modification Forum Agenda Wednesday, 27 January 2021

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 Update re Impact of Covid 19	10	10:40 - 10:50
4.	GNI Scheduled Maintenance Update - Operational Maintenance - IT Maintenance/updates	5	10:50-10:55
5.	Gas Quality – Proposed Changes Update	10	10:55-11:05
6.	Code Modification Proposal A087 – New Framework for Suppliers in PPM Market (For Mention)	5	11:05- 11:10
7.	Code Modification Proposal A096 –Data Sharing Agreement (For Mention)	5	11:10-11:15
8.	Code Modification Proposal A101- Extension of Daily Capacity Booking Window (For Mention)	5	11:15-11:20
9.	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	15	11:20-11:35
10	Status of Code Modification Proposals	10	11:35-11:45
11.	Gas and Electricity Interaction	5	11:45-11:50
12.	Brexit Briefing Update	5	11:50- 11:55
13	AOB Items Next Meeting	5	11:55- 12:00



### **Code Modification Forum**

Minutes of Zoom Meeting – 27 January 2021





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### 2 Standing Items

#### 2.1 Approval of minutes of previous meeting

The minutes of the Code Modification Forum ("CMF") Meeting of 16 December 2020 were agreed and approved.

For supporting information, to be read in conjunction with these minutes, please see the slides presented at the 27 January 2021 Zoom Meeting.

#### 2.2 Review of action items

The actions from the previous CMF Meeting of 16 December 2020 were reviewed and discussed

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

**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 C572 would remain open.

#### 2.3 GNI Update re Impact of Covid 19

The Transporter reported that its field activities were curtailed in compliance with Level 5 Covid restrictions detailed on 14 bullet points on Slide 5. GNI continued to notify Industry retail divisions of any impacts for end users through the GMARG Forum.

The Transporter referred to recent media releases in relation to Irish gas demand and to the fact that natural gas is the alternative energy source to satisfy power generation requirements when wind is low or non-existent.

#### 2.4 GNI Scheduled Maintenance Update

The Transporter reported that there was no change from its report to the December meeting and referred to Slide 6 which, as with the Slide furnished in December specified the two scheduled maintenance activities for the Gas Year 2020/21. The first scheduled activity was on 19 May 2021 and involved Bellanaboy Station Testing, valve check and validation at Cappagh South and would take one day. The second activity involved ESD testing at the Corrib Terminal on 8 September 2021 and was planned to coincide with annual Corrib Operator planned maintenance. The Transporter also referred to the screenshot on Slide 6 of the remit notification from the Corrib Operator of a planned shutdown of the Bellanaboy Terminal for 16 days in July (6-22 July).

#### 2.5 Gas Quality Update

The Transporter, referring to Slide 7, which specifies National Grid's indicative timelines for the UK gas quality consultation process, reported that the first milestone, i.e. the finalisation of the IGEM GQ standard was due to issue in late February /early March.

The Transporter referred to Slide 8 which gave an update on the Transporter's proposal to lower the CV minimum requirement for biomethane entry points on the Transmission Network. Analysis was being carried out by the Transporter who had also commissioned a report from consultants. The Transporter had requested Industry to work with OEMs to assess possible impacts and some feedback had been received leading to some bilateral meetings. A further update would be presented to the March CMF Meeting and, in the interim, industry comments / queries were welcome and should be directed to Yvette.jones@gasnetworks.ie

#### 3 Code Modification Proposals

#### 3.1 A087 – New Framework for Suppliers in PPM Market

The Transporter reported that the legal text was finalised and circulated to the Mailing List. The consequent five-week consultation process ended on 21 December without response. On 22 December the associated Deed of Covenant was circulated with no subsequent response. The CRU asked the meeting for comment on the Deed of Covenant and, when there was none, then concluded the consultation review.

### 3.2 A096 – Data Sharing Agreement/ A096A- Model Clauses to address a Hard Brexit

The CRU reported that it was intended to close out this Proposal before the end of February or at least before the next Code Modification Forum meeting on 24 March.

### 3.3 A101- Amendment to Code of Operations to facilitate the extension of the Daily Capacity Booking Window

The CRU presented a series of slides (11-18) setting out the background to the Proposal, the issues raised, the alternative resolutions and its minded to decision;

- (i) to extend the daily capacity booking window to 4.59 am (on day D)
- (ii) to reduce the capacity charge multiplier from the current level of 4x to 1.5x at Entry and Exit.

For clarity the capacity charges are; IP Capacity Overrun Charges, Entry Capacity Overrun Charges, Exit Capacity Overrun Charges, Sub-Sea I/C Offtake Capacity Charges, and IP Interruptible Capacity Overrun Charges.

A Shipper Representative queried when an Instruction from the CRU might issue and subsequently come into effect .The CRU stated that the matter would be considered internally at Director level in the near future and would come into effect on the first day of the month after the date of Instruction issue as the change would only necessitate a configuration change in the Transporter IT system.

A Shipper Representative noted that the extension of the booking capacity window would involve some adjustment on the part of Shippers' booking control desks and the Transporter confirmed that it was available to discuss any Shipper concerns.

A Shipper Representative queried whether the extension of the daily capacity booking window would apply to Exit Points as well as Entry Points. The Transporter stated that it would consider this request when finalising its Instruction.

#### 3.4 Status of Code Modification Proposals

The Transporter summarised the present position in relation to Code Modification Proposals. There were now four live current Modification Proposals.

Number	Proposal	Proposer	Status
A087	New Framework for Suppliers in PPM Market	GNI	Consultation complete/under CRU review
A096	Data Sharing Agreement	GNI	Consultation complete/under CRU review
A099	CNG Supply Point Capacity Setting	GNI	In abeyance
A0101	Extension of Daily Exit Capacity Booking Window	ESB	Consultation complete/under CRU review

### 4. Other Agenda Items

#### 4.1. GNI Review of Code of Operations

The Transporter referred to two suggested Proposals specified at the previous two meetings, i.e. a Proposal to transfer Capacity Overrun Charge receipts from the Disbursements Account to the GNI Transportation Account and, a second Proposal to remove the maximum annual cap on overrun charges.

The Transporter had requested Shippers to consider these proposals referring them to their operational/billing sections where relevant stating it would welcome any comments/ queries and it now intended, as no adverse reaction was received, to proceed to initiate and circulate a Code Modification Proposal A104(which would incorporate both of the above Proposals).

#### 4.2. Gas and Electricity Interaction

The Transporter referred to the minded to decision of the CRU, which when implemented would, to some extent, alleviate the difficulties being experienced by the Powergen sector arising from the receipt, at short notice, of call on instructions from Eirgrid.

#### 4.3. Brexit Update

The Transporter referred to Slides 23 -27 inclusive in relation to its Brexit update. Slide 24 refers to the EU -UK Trade and Cooperation Agreement of 24 December 2020 and, more particularly Chapter V111 (Energy). The Transporter considered that this provision was as good as could be hoped for with no disruption of supply with the anticipated administrative requirements of both Shippers and the Transporter for custom returns.

Slide 25 details in bullet point format the main provisions of Chapter V111. Slide 26 again specifies the declaration requirements of HRMC in relation to exports from GB to ROI with GNI (UK), as Fixed Transport Operator (FTI) responsible for completing declarations on a monthly basis. Finally, slide 27 details the declaration requirements of Irish Revenue in relation to imports to Roil from GB. In this case the importing Shipper is responsible for lodging declarations using Entry in the Declarants Records, i.e. the importer must record relevant information to a customs declaration in their own IT systems.

A Shipper Representative questioned Rol's security of supply position now in relation to the UK from where, at this stage, it sourced 47% of its annual natural gas requirements. The Transporter stated that the provisions of Chapter V111 are positive in this regard an, in any case, the provisions of the International Treaties between the two countries take precedence. It should be noted that the UK is now a net importer of gas with some of its requirements imported from the EU. The question of security of supply is an ongoing concern of the Department of Energy and Climate Change.

#### 4.4. Any Other Business

A Shipper Representative queried when the Consultation on TAR NC Art.28 review of levels of Multipliers, Seasonal Factors and VRF would commence. The CRU responded that it was anticipated that the consultation would be launched by the end of February.

## 5. Open CMF actions

ID	Action	Responsibility	Date Raised	Delivery Date
C57	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/3/2019	Ongoing
<b>C</b> 57	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/CR U	25/3/2020	Ongoing

### 6. Calendar of meetings for 2021

CMF Date	Location
Sim Suis	
27 <sup>™</sup> January 2021 (Wednesday)	Zoom Meeting
24 <sup>th</sup> March 2021 (Wednesday)	Zoom Meeting
24 maron 2021 (Woundsday)	250m Westing
16 <sup>th</sup> June 2021 (Wednesday)	Zoom Meeting
18 <sup>th</sup> August 2021 (Wednesday)	Dublin
20th October 2024 (Modreedov)	Dublin
20 <sup>th</sup> October 2021 (Wednesday)	Dublin
15 <sup>th</sup> December 2021 (Wednesday)	Dublin

### 7. Attendees

	Name	Representing
1	Name	Representing
1	Andrew Kelly	GNI
2	Kieran Quill	GNI
3	Ike Udobi	GNI
4	Bernard O'Neill	GNI
5	Brian McGlinchey	Vermillion
6	Kirsty Ingham	ESB
7	Richard Harper	Nephin Energy
8	Martin Regan	Marex Spectron
9	Kirsty Ingham	ESB
10	Bryan Hennessy	Naturgy
11	Kevin Murray	BGE
12	Johnny Byrne	CRU
13	Daniel Ward	CRU
14	Vivion Grisewood	Aughinish
15	Stephen O'Hare	GNI
16	Terry Burke	Equinor
17	Peter Colleran	Nephin
18	Sarah Thatt-Foley	GNI

19	Mark Phelan	Electric Ireland
20	Nicolas Lincoln	Nephin
21	Eoin Madigan	
22	John King	DECC
23	James Gallagher	
24	Keith Deacon	AXPO
25		
26		
27		
28		
29		
30		



# Code Modification Forum

Wednesday, 27 January 2021 (via Zoom)

### Agenda

- Review of minutes from last meeting
- Review of open actions
- GNI Update re Impact of Covid 19
- 4. Update on Maintenance
- Gas Quality –Proposed Change Update
- 6. Code Modification Proposal A087 New Framework for Suppliers in PPM Market
- 7. Code Modification Proposal A096- Data Sharing
- 8. Code Modification Proposal A101- CRU Minded to position
- 9. 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
- 10. Status of Code Modification Proposals
- 11. Gas and Electricity Interaction
- 12. Brexit briefing update
- 13. AOB Items



### 1. Review of minutes from last meeting

Minutes of CMF meeting of <u>16 December 2020</u> were issued on 27 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 tariff review in connection with tariff review in relation to SPC Settings for CNG Offtakes	Transporter	Open	High



## 3. GNI Update – Level 5 activities

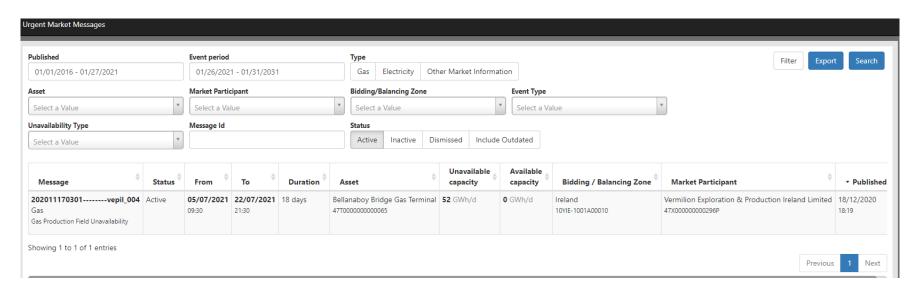
- Most activities take place as normal. Some activities/ support activities may be deferred subject to risk assessment/ criticality.
- New connections: Each connection to be assessed on its merits to consider the "essentiality" of the customer and their readiness for gas.
- PE in Porches project suspended.
- Mains reinforcement/ extension: Each project to be assessed on its merits to consider the essentiality of the project/ customer and their readiness for gas.
- Outdoor meter fits unrestricted.
- Meter fits, unlocks, exchanges and similar work requiring access to occupied properties -capacity restricted to no more than 6 per fitter per day.
- Programmed work will continue where customers are happy to accept appointments. Customer to be offered additional opt-out on the doorstep.
- Meter replacement programme continues for outdoor meters only.
- Battery replacement continues where customer agrees to visit in advance.
- Customer/ shipper driven work prioritised over GNI programmed work.
- Long term no-access visits suspended.
- Credit locks suspended per CRU direction.
- Mature domestic GSED visits suspended unless
- External meters being read while Internal meter reading suspended.



### 4. 2020/2021 Maintenance Days

Maintenance Programme Gas Year 2020/21				
Date	Duration	<b>Entry Points</b>	Commentary	
19 <sup>th</sup> May 2021	1	Bellanaboy	Station testing, valve check and validations at Cappagh South.	
		Bellanaboy	ESD testing at the Corrib Terminal (will be coordinated with the annual Corrib planned maintenance).	

Bellanaboy REMIT Page - https://iip.remitor.eu/#/?publisher=47X000000000296P





## 5a.Gas Quality –UK Changes –December 2020 Update

- National Grid have presented industry with their view on timeline:
  - IGEM GQ Standard finalised in Q1 2021
  - Government impact assessment consultation process commences in Jun-21 and UK Parliament amends GSMR Regulations during Q2 2022
  - Unified Network Code (UNC) process to modify GQ specifications in the Network Entry Agreements (NEA) during Q3 2022
  - First wider-specification gas is likely to flow in Q2 2023
  - NG believe Parliament will amend GSMR, but due to potential commercial impact stakeholders may "negotiate" on local implementation during UNC process





## 5b.Qas Quality –Renewable Gas

- GNI is considering lowering the minimum CV requirement and increasing the maximum allowed for oxygen for biomethane entry points on the Transmission Network
- Current Code of Operations requirements are:
  - CV 39.9 42.3 MJ/m3
  - Oxygen <0.2% (1% for biomethane entry points on the Distribution Network)</li>
- GNI requested Industry to work with OEMs to assess possible impacts
  - Feedback received from some parties
  - GNI has held bilateral meetings with a number of Shippers
- Analysis continues by GNI and its consultant
- In the meantime questions/ comments to Yvette.jones@gasnetworks.ie



### 6. Code Mod A087- New Framework for Suppliers in PPM Market

- On 21st November, 2018 the CRU issued instruction approving A087 and implementation of a new framework.
- The key change is that rather than GNI procuring and negotiating front office service agreements, suppliers will
  procure their own front office services as of 1<sup>st</sup> July 2021.
- Working Group, set up under GMARG Terms of Reference, is reviewing the operational and contractual arrangements in advance of the implementation date
- GNI have, at Workgroup Meeting on 23 January, presented their proposed contractual pathway- a Deed of Covenant between the front office service suppliers and GNI which Shippers will be obliged to procure
- The contractual documentation was reviewed by Workgroup and existing Front Office Service Providers
- The legal drafting for the Code Modification was circulated to the CMF Mailing List on 21 October for review review period expired on Monday 21 December 2020 without comment. On 22 December the Deed of Covenant was circulated



### 7. AO96 Data Sharing Agreement

A096 -Transporter Proposal – To provide for an updated data sharing regime between
Transporter and Shippers to comply with provisions of Data Protection Act 2018
(implementing the General Data Protection Regulation (GDPR) (EU) 2016/679) and to reflect
the reality of personal data transfers between the Transporter and the Shippers –
CONSULTATIVE REVIEW COMPLETED.



## 8. Code Modification A101: CRU Update

- Aim of short CRU presentation today:
  - Recap discussions from November teleconference
  - Outline CRU minded-to position in relation to A101





## Recap: CRU view on initial proposal

- At November A101 teleconference, CRU gave views on options in initial proposal.
- CRU considers that the options in the original A101 proposal involve fundamental change to established capacity booking regime.
- CRU has concerns about potential unintended consequences of such fundamental changes.
- In particular, CRU has concerns about changes that greatly reduce or remove Shippers' incentive to accurately book capacity in advance of end of Gas Day.
- CRU set out and explained an alternative proposal for consideration at the November A101 teleconference.





## Recap: Alternative Proposal Rationale

- Reduce the risk of unintended consequences by avoiding fundamental rewrite.
- Retain appropriate incentive to accurately book daily capacity in advance.
- Retain ability for CRU to adjust incentives if needed.
- EU projects ongoing in relation to sector-coupling (e.g. Sector Integration Strategy).
  - Fundamental rewrite may not be prudent at this time, as further work may need to be done to adapt to new EU recommendations.
- The alternative proposal can be implemented quickly (does not require in-depth policy analysis).





### **CRU Minded-to Position**

- CRU is minded to proceed with a modification in line with the alternative proposal, as follows:
  - (I) extension of the daily exit capacity booking window to 4.59am (on day D); and
  - (II) reduction in the capacity overrun multiplier from the current level of 4X to 1.5X at Entry and Exit.





## CRU Minded-to Position: Entry Overruns

- In November, CRU stated it was still considering whether a reduction in the entry overrun multiplier was appropriate.
- GNI has since indicated that entry overruns have in fact decreased since the last reduction in the overrun multiplier in 2019.
- CRU is satisfied that a reduction in the overrun multiplier at Entry can be made, given that the last reduction did not result in adverse consequences.





### CRU Minded-to Position: further detail

'Minded-to' modification would reduce the overrun multiplier to 1.5X for the following categories of transmission capacity overrun charges:

- IP Capacity Overrun Charge,
- Entry Capacity Overrun Charge,
- Exit Capacity Overrun Charge,
- Sub-Sea I/C Offtake Capacity Overrun Charge and
- IP Interruptible Capacity Overrun Charge.





### CRU Minded-to Position: further detail

- CRU considers that an overrun multiplier of 1.5X is sufficient to incentivise accurate and timely booking behaviour, without being overly penal or unnecessarily high.
- However, capacity booking behaviour and capacity overruns should be kept under review to determine whether the multiplier is adequately incentivising accurate and timely booking.
- The overrun multiplier may be adjusted in the future if needed to incentivise good booking behaviour.
- Modification will be subject to Director approval within CRU. Minded-to position set out today.





### **Questions or Comments?**

- CRU would like to thank Shippers for their input in relation to this modification.
- We would welcome any questions or comments you may have.





## **Code Modification Proposal A104**

- Proposal to amend Code of Operations to transfer Capacity Overrun Charge revenues to allowed revenues and removing the maximum annual caps on overrun charges
- Proposer Gas Networks Ireland
- Rationale for Proposal;

#### Move the monies associated with Capacity overruns from a Disbursements Account into GNI Transportation Revenues Account

- GNI will not earn any additional revenues under the Revenue Cap
- The incentive to book sufficient capacity does not change
- Monies will be returned to shippers via lower future tariffs
- Monthly billing will be greatly simplified as each shipper holding capacity is issued a monthly credit related to overruns.
- If an overrun is subsequently refunded/cancelled the Disbursements Account has to be resettled.



## Code Modification Proposal A104 (cont.)

#### Remove the maximum annual cap on overrun charges ( Part C -Section 11.3.6(c))

- This cap is a carryover from the tariff regime that existed before short term capacity charges were introduced in 2007
- The cap has never been reached, nor has any shipper come close to the cap
- The IT systemisation is very complex and must be tested each time there is a change that affects the billing of Capacity Charges
- GNI believes that the cap is redundant and should be removed.



## 9. Status of Code Modification Proposals

Number	Title of Proposal	Proposer	Status
A087	New Framework for Suppliers in PPM Market	GNI	Live/ Implementation process review
A096	Data Sharing Agreement	GNI	Live/Under review
A099	CNG Supply Point Capacity Setting	GNI	In abeyance
A101	Extension of Daily Exit Capacity Booking Window	ESB	Live/Under review
	Transfer Capacity Overrun Charge revenue to allowed revenues/ removing maximum annual caps on overrun charges	GNI	Live/Under review



## 12. Gas and Electricity Interaction





# 12. BREXIT - Customs Returns

**Update to the Code Mod Forum** 

January 2021

## **Brexit Update**

- EU-UK Trade and Cooperation Agreement reached 24 December 2020. The Agreement includes a chapter on energy (Chapter VIII). From an energy perspective, the deal was as good as one could have hoped for.
- As expected, no disruption to the daily importation of natural gas from Great Britain to Ireland from January 1st 2021.
- Administrative requirement for both importing shippers and GNI to submit customs declarations on natural gas imports from Great Britain.
- Movements from ROI to N.I via South North Pipeline not liable for customs returns under the Northern Ireland Protocol.
- GNI (UK) required to submit export declarations to HMRC on a monthly basis. First deadline is February 4<sup>th</sup> 2021.
  - GB SAP agreed with HMRC as the applicable market value.



## Summary of <u>EU-UK Trade and Cooperation Agreement</u>

Provisionally applies from 1 January 2021 (yet to be ratified by EU Council & Parliament). Agreement has 5 year review clause.

#### TITLE VIII: ENERGY

- Gas trading will remain unchanged with fundamental principles such as non-discrimination, transparency and free competition protected.
- Agreement covers natural gas, biogas, and any other gas that can be transported through natural gas pipes.
- Enhanced cooperation on renewable energy, particularly in the North Seas, opening up the possibility of hybrid interconnectors.
- Technical cooperation between regulators and system operators on security of supply, network development and market abuse.
- Maintains tariff-free trade, which will support delivery of low-cost energy supplies and deployment of new renewable infrastructure vital for delivery of net zero targets.
- A strong principle of non-regression, including on carbon pricing, is included. The UK Government has confirmed that its carbon pricing policy from 1 January 2021 will be a new UK Emissions Trading Scheme (UK ETS) linked to the EU ETS.
- The 2015 Paris Agreement on climate constitutes an essential element of the Agreement. Any violation of this element by one Party gives the other Party the right to terminate or suspend all or parts of the Agreement.
- The EU and the UK also reaffirm their ambition to achieve economy-wide climate neutrality by 2050.
- Establishment of Specialised Committee on Energy to review and make adjustments to energy provisions within the Agreement.
- Finally, ongoing dialogue between the EU and UK on energy matters until the 30th of June 2026, with scope for future renewal.

## Exports from GB to ROI (HRMC)

- For energy movements imported or exported via a pipeline, cable or interconnector (collectively known as fixed transport installations), the FTI operator (GNI (UK) in the instance of exports from GB to ROI) will be responsible for completing the declarations.
- From January 2021, entries into declarant's records will be made over a calendar month and followed by
  information submitted to HMRC systems via a supplementary declaration to HMRC by the fourth working day of
  the following month.
- Entry in Declaration should include:
  - i) Customs procedure code (likely the same for all FTI movements);
  - ii) Unique code consignment ref number
  - iii) Date & time of entry and when goods have actually moved e.g. end time product moves;
  - iv) Customs value
  - v) Written description of goods & commodity code for goods and;
  - vi) volume of product moved.



## Imports from GB to ROI (Irish Revenue)

- The UK is now a 3<sup>rd</sup> country from the EU's legal perspective and thus no longer part of the internal energy market.
- <u>Customs Declarations</u> The Customs declaration must be lodged, at the latest, by the time the goods are presented to customs. The party responsible for lodging the customs declaration is the importer.
- Irish Revenue expects this requirement to be fulfilled using Entry in the Declarants Records. This means that the
  importer (i.e. the gas shippers in this instance) must record relevant information to a customs declaration in their
  own IT systems.

#### • Latest Update:

- Irish Revenue has yet to determine how to treat Virtual Reverse Flows from a customs perspective.
- Irish Revenue reporting good engagement with Shippers so far.



## **AOB**



## Code Modification Forum Meetings in 2021

Nestino

CMF Dates 2021	Location
27 <sup>th</sup> January 2021 (Wednesday)	Zoom Meeting
24 <sup>th</sup> March 2021 (Wednesday)	Zoom Meeting
16 <sup>th</sup> June 2021 (Wednesday)	Zoom Meeting
18 <sup>th</sup> August 2021 (Wednesday)	Dublin
20st October 2021 (Wednesday)	Dublin
15 <sup>th</sup> December 2021 (Wednesday)	Dublin





# Thank you for your participation