CODE OF OPERATIONS MODIFICATION PROPOSAL



MODIFICATION DETAILS

Modification Number: A097 Modification Title: Amendment of Final Exit Allocation Date

Modification Proposer:	Modification Representative:	Modification Representative Contact Details (email address):	Date Submitted:	Proposed Implementation Date:
Gas Networks Ireland	Andrew Kelly	Andrew.kelly@gasnetworks.ie	4/10/18	ASAP

Proposal (including rationale):

To amend the Final Allocation Date in respect of LDM Offtake(s), DM Offtake(s), NDM Supply Point(s) and Sub-Sea Offtake from D+5 to M+5 (i.e. 5 calendar days after month end). Meter cleansing takes place at the start of a month for the preceding month and this is usually after D+5. This amendment will allow GNI Grid Control sufficient time to correct meter cleansing issues which will in turn result in the issuing of more accurate monthly allocation statements/invoices which will inform Shippers subsequent customer billing.

Proposed Implementation Date:

To be implemented one month after approval

Proposed section of the Code to be modified:

Part A -definition of Final Supply Point Allocation; Part D - Sections 2.8, 2.9 2.10; Part E- Section 1.5, 1.9, 2.4,; Part G- Section 3.9

MODIFICATION MOTIVATION

Intended Outcome of the Proposed Modification:

To improve accuracy of exit allocation data furnished by GNI to Shippers

Benefits of implementing this Modification:

The monthly allocation statements /invoices issued to Shippers from GNI Trading & Settlements will have been informed by data from the meter cleansing process

Consequences of not making this Modification:

The present situation will pertain where any metering issue uncovered after D+5 is treated as a month end adjustment which is not attributed to any individual date creating customer billing issues for Shippers

Illustrative Example (Please enter a scenario where the issue and solution are illustrated):



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APPROVAL OF MODIFICATION

CODE MODIFICATION A097 FINAL EXIT ALLOCATION DATE AMENDMENT

COMMISSION INSTRUCTION

Pursuant to Section 13 (1) of the Gas (Interim) (Regulation) Act, 2002, the Commission hereby approves Code Modification A097 'Final Exit Allocation Date Amendment'.

This modification amends Part A (Definitions) Part D (Nominations, Allocations and NDM Supply Point Reconciliation) and Part E (Balancing and Shrinkage) of the Code of Operations. This approved modification will come into effect on 1 November 2019.

Karen Trant, Director of Energy Networks

Issue Date: 15 10 2019



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CODE MODIFICATION A097 FINAL EXIT ALLOCATION DATE AMENDMENT COMMISSION RATIONALE

Pursuant to Section 13 (1) of the Gas (Interim) (Regulation) Act, 2002, the Commission approves Code Modification A097 Final Exit Allocation Date Amendment. This approved modification will come into effect on 1 November 2019. The background and rationale are set out below.

BACKGROUND

At the start of each month, Gas Network Ireland (GNI) invoices Shippers for use of the gas system. For these invoices, GNI takes into account the most accurate and update metering information available. This includes GNI carrying out Meter Cleansing before the invoices are issued. Meter cleansing is a quality assurance process and sees GNI go out to a number of selected sites, whose meters are remotely read, to check that the remote readings match what is being recorded and stored on the meter. Where any discrepancies are found, invoices are adjusted accordingly. As best as possible, GNI allocate any adjustments from updated metering data (meter cleansing or otherwise) to a specific day. However, this is not always possible. One limitation, in this regard, emanates from a provision in the Code of Operations

Currently, the Code of Operations requires GNI to provide Shippers with final figures as to how much their customers consumed (their Final Allocation readings) five days after the fact or D+5 for short. In accordance with the Code of Operations, this Final Allocation cannot be changed. However, although Final Allocation readings are issued on D+5, shippers are only invoiced for this use during the following month. During the intervening time, new information can emerge (for

example through the Meter Cleansing activities) which may impact on the Final Allocation. However, due to the rule that Final Allocation reading cannot be altered, this leads to an overall adjustment to the amount invoiced rather than allocating the adjustment to a specific day (which would alter the Final Allocation for that day). This can lead to customer billing issues.

BRIEF OUTLINE OF THE CODE MODIFICATION

The Final Allocation reading in respect of LDM Offtake(s), DM Offtake(s), NDM Supply Point(s) and Sub-Sea Offtakes must be provided to a shipper 5 days after the initial allocation i.e. D+5. The proposed modification changes the date so that the Final Allocation reading will be provided until 5 days after the end of the calendar month i.e. M+5.

REASONS FOR APPROVAL OF THE CODE MODIFICATION

This code modification will require GNI to provide Shippers with their Final Allocation reading on M+5 (i.e. 5 days after the end of the calendar month) rather than D+5 (i.e. 5 days after the start of the calendar month). This means that in the instance a meter read has to be corrected or 'cleansed' GNI will be able to allocate the corrected meter quantities on a daily basis rather than applying a month end adjustment to the end of a Shippers' bill. This code modification will allow GNI more time to gather data and provide Shippers with their Final Allocation reading. As such, it will result in GNI issuing more accurate allocation statements to Shippers and enable Shippers to present more accurate allocation statements to customers. It should be noted that Shippers will receive updated daily allocations daily up to M+5 and the invoicing intervals will not change