

Code Modification Forum

Minutes of Teleconference – 19
August 2020



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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 17 June 2020 were agreed and approved.

For supporting information, to be read in conjunction with these minutes, please see the slides presented at the 19 August teleconference, (both the main meeting slides and the slides separately circulated in relation to Agenda Item 3.)

2.2 Review of action items

The actions from the previous CMF Meeting of 25 March were reviewed and discussed

The Transporter gave an update on open actions as per slide 4 of this [meetings presentation pack](#).

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

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. In this regard the CRU reiterated, in light of recent Industry queries that the soft landing from SPC Charges for CNF Offtakes would remain in place until the review had been completed and Code Modification Proposal A099 (*CNG Supply Point Capacity Settings*) was decided

Action Items C572 and C572 would remain open.

2.3 Brexit – Customs Returns Update

The Transporter referred to this added Agenda Item No.3 and associated three presentation slides which was prompted by recent discussions with the Irish Revenue and Aine Spillane, Regulatory Affairs Manager, GNI, subsequently presented the Slides.

In relation to HRMC requirements regarding exports from Great Britain to the Republic of Ireland, GNI (UK), as the Fixed Transportation Operator (FTI) will be responsible for completing the relevant declaration on a monthly basis.

In relation to Irish Revenue requirements regarding imports from Great Britain to the Republic of Ireland, GNI as the carrier, has the benefit of a waiver from the requirement to lodge an ENS (Safety and Security declaration). The customs declaration however, as previously pointed out by the Transporter, is the responsibility of the individual Shipper and the Transporter repeats that it will not be filing customs declarations on behalf of Shippers

The customs declaration must be lodged, at the latest, by the time the goods are presented to customs. As stated the party responsible for lodging the customs declaration is the importer (i.e. the Shipper). In relation to the declaration, Irish Revenue expect this requirement to be fulfilled using Entry in the Declarants Records. This means that Shippers will need to record the information relevant to a customs declaration in their respective IT systems.

Irish Revenue has recently advised that, to date, engagement between it and individual gas shippers has been minimal and the Transporter would encourage all Shipper to engage with Irish Revenue as a matter of urgency to ensure obligations are met following the end of the Transition Period.

2.4 GNI Update re Impact of Covid 19

The Transporter reported that its maintenance and construction activities had returned or were returning to normal in line with government guidelines with the exception of Laois, Kildare and Offaly which were at present the subject of a localised lockdown. Demand on the system was strong with sectors affected by Covid-19 returned or returning to normal levels. The Transporter referred to Slides 6-8 which graphically showed the positive trends in the hotel, laundry, food and beverage, pharma and gas fired power generation sectors

2.5 GNI Scheduled Maintenance Update

The Transporter referred to Slide 9 where the only prospective maintenance activity was planned ESD testing at the Corrib Terminal which will be coordinated with the annual Corrib Operator planned maintenance which is scheduled for 7 September to 28 September inclusive. In this regard the Transporter requested timely nominations from Shippers at Moffat during this period when it will be the only source of gas to the system.

2.6 Gas Quality Update

The Transporter, referring to Slide 10, reported on the NSAI Gas Technical Standards Committee which will support the development of national and international standards in gas quality including the analysis of natural gas, renewable gas and hydrogen. The Transporter had circulated the invitation to Industry to become members of the Committee and will update the Forum of any ongoing communications from the Committee.

3 Code Modification Proposals

3.1 A087 – New Framework for Suppliers in PPM Market

The Transporter reported that, since the last meeting, the contractual documentation underpinning the new arrangements has, after a substantial consultation with Shippers/Suppliers, and, in particular, the existing Front Office Service Providers, been finalised and submitted to the Working Group. It is expected that the relevant legal text for the Code Modification will be circulated in advance of the next meeting

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

The Transporter reported that this item was mainly being progressed under the GMARG forum and had been left in abeyance as new Covid-19 working arrangements for the retail sector were developed and implemented. The CRU has now requested the Transporter to publish its position on categories of the various data streams before the end of Q3 with the intention that the item is referred back to the Code Modification Forum for finalisation in Q4. The Transporter confirmed that it is working to that timetable.

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

The CRU referred to the circulated note in relation to this Agenda Item to the effect that, at this teleconference the Proposal would be for mention only. The CRU referred to the feedback received from Industry which was being considered internally. It was researching the position on this area in other jurisdictions and continuing to request further data from the Transporter. All of the four options specified by the Proposer were being reviewed by the CRU with the criteria of considering what remedial measure, for what is an acknowledged problem, might produce unintended consequences or would considerably weaken the current incentives for good nomination behavior. As mentioned in the circulated note a specific conference call on the matter will be organised towards the end of September.

An Industry participant, while expressing some disappointment at the timeline for consideration of this Proposal, welcomed the conference call at which it would fully engage and suggested that the CRU note the content of an analogous amendment provision to the UNC in Great Britain

3.4 A103- Changes to Shipper Portfolio Tolerances

The CRU, which had proposed and presented this Proposal, now confirmed that the review period had elapsed and it intended to publish its Instruction/ Rationale in the near future.

3.5 Summary 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	Live/Implementation process review
A096	Data Sharing Agreement	GNI	Under Review/Legal Drafting for part finalised
A099	CNG Supply Point Capacity Setting	GNI	In abeyance
A100	Provisions for offtake of Natural Gas at Haynestown, County Louth from the South/North Pipeline	GNI	Completed
A101	Extension of Daily Exit Capacity Booking Window	ESB	Live/ Under review
A103	Changes to Shipper Portfolio Tolerances	CRU	Approved/Instruction to issue

4 Other Agenda Items

4.1 Notice of intended Code Modification to increase oxygen limit at RNG Entry Points to the transmission system

Yvette Jones, Market Projects Manager, GNI, presented this item referring to Slide 17, mentioned Code Modification Proposal A091, which was effective since February 2019, and extended the oxygen content for gas derived from Renewable Natural Gas at an RNG Entry connected to the Distribution System up to 1mol%. To facilitate a proposed RNG Entry Connection to its Transmission System the Transporter was giving notice of its intention to initiate a Code Modification Proposal to similarly extend the oxygen content for such gas to the same limit.

When submitting the A091 Proposal the Transporter had circulated a Report from Penspen Consultants entitled; *Biomethane – Oxygen Content Assessment*. This Report would again be circulated to the CMF Mailing List after this meeting and the Transporter would welcome submissions as to the efficacy of this Report for the proposed transmission entry connection up to 16 September next. Any such submissions or any queries relating to the Transporter's RNG Transmission Entry project should be directed to Yvette.jones@gasnetworks.ie.

4.2 Gas and Electricity Interaction

The Transporter referred to the CRU decision to end the LDM dead band tolerance exemption which had been under continual review. The Transporter also noted the review of Code Modification Proposal A101-*Proposed extension of Daily Exit Capacity Booking Window* which was mainly a concern of the PowerGen Sector

4.3 GNI Briefing on proposed change to allocation arrangements at the Moffat IP

The Transporter referred to the stakeholder consultation launched jointly by Gas Networks Ireland and GNI (UK) in relation to a revised allocation methodology agreed with National Gas Grid at the Moffat Interconnection Point. The change requires an amendment to the Interconnection Agreement for the Moffat IP and a consequent

amendment to the associated Tripartite Agreement relating to arrangements at Moffat between GNI, GNI (UK) and National Grid Gas.

The details of the proposal/consultation, with the text of the amendments to the Interconnection Agreement and Tripartite Agreement are on the GNI Transparency Portal at;

<https://www.gasnetworks.ie/corporate/gas-regulation/regulatory-publications/moffat-ia-consultation-20/index.xml>.

5 Open CMF actions

ID	Action	Responsibility	Date Raised	Delivery Date
C572	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/3/2019	Ongoing
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/CRU	25/3/2020	Ongoing

6 Calendar of meetings for 2020

CMF Date	Location
29TH January 2020 (Wednesday)	Dublin
25th March 2020 (Wednesday)	Dublin
17th June 2020 (Wednesday)	Cork
19th August 2020 (Wednesday)	Dublin
21st October 2020 (Wednesday)	Dublin
16th December 2020 (Wednesday)	Dublin

7 Attendees

	Name	Representing
1	Andrew Kelly	GNI
2	Kieran Quill	GNI
3	Ike Udobi	GNI
4	Aine Spillane	GNI
5	Brian McGlinchey	Vermillion
6	James Tyrell	ESB
7	Richard Harper	Nephin Energy
8	Martin Reagan	Marex Spectron
9	Kirsty Ingham	ESB
10	Bryan Hennessy	Naturgy
11	Sean Mac An Bhaird	CRU
12	Johnny Byrne	CRU
13	Christina Sykes	Shell
14	David Horan	Aughinish
15	James Tyrell	ESB
16	Keith Deacon	AXPO
17	Kirsty Ingham	ESB
18		

19	Mark Phelan	Electric Ireland
20	Sinead Obeng	Gazprom
21	Stephen English	GMO-NI
22	Diarmuid Murphy	Tynagh
23	Paul Hoey	Electric Ireland
24	James Gallagher	
25	Brian Hennessey	Naturgy
26	Nicolas Lincoln	Nepkin
27	Peter Colleran	Nepkin
28	Sean McParland	
29	Chris George	Gazprom
30	Paul Barnett	Manx UA