

# Code Modification Forum

Minutes of Teleconference – 25  
March 2020



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# 1 Standing Items

## 1.1 Approval of minutes of previous meeting

The minutes of the Code Modification Forum (“**CMF**”) Meeting of 25 January 2020 were agreed and approved.

For supporting information, to be read in conjunction with these minutes, please see the slides presented at the 25 March teleconference.

## 1.2 GNI Update on Covid -19 Arrangements

The Transporter referred to Slide 3 of the Meeting Presentation Pack and outlined its up to date Covid-19 contingency arrangements. It was envisaged that there would be few difficulties on the wholesale market side. The retail market may face slightly greater difficulties but these are being addressed and mitigated with Shippers/Supplier, the CRU and DCCAIE. A drop-off in demand in the NDM and DM sectors was expected but the demand in other sectors was expected to align with the usual seasonal variances. The link to the Transporter’s Covid-19 contingency procedures is:

<https://www.gasnetworks.ie/corporate/news/active-new-articles/covid-19-update/>

The CRU confirmed that it had an internal team working on contingency arrangements and was liaising with the Transporter and the DCCAIE. There was no significant impact to its work programme in relation to the gas sector but some delays may be experienced in this ever developing situation. The CRU will keep the forum updated as to work progress. The CRU mentioned its annual tariff review, which was underway.

## 1.3 Review of action items

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

The Transporter gave an update on open actions as per slide 5 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 C574** required Shippers to forward Submissions to CRU in relation to their post I-SEM experiences of dead-band LDM capacity booking. The CRU referred to its discussions with ACER regarding the remaining balancing tolerances as reported at the January CMF Meeting. For ACER the existing tolerances were a non-compliance issue in relation to the provisions of the Balancing Network

Code and Ireland's non-compliance has been highlighted in an ACER Report on Implementation Monitoring of the Balancing Network Code. The CRU stated that it would be issuing a Code Modification Proposal in advance of the June Meeting to remove the remaining tolerances in order to comply fully with the provisions of the balancing network codes. Action Item C574 would therefore close.

Action Items C572 would remain open.

#### **1.4 GNI Scheduled Maintenance Update**

The Transporter referred to Slide 6 which mirrored the Maintenance slide at the January meeting where the Transporter indicated that it was co-ordinating its planned maintenance programme with planned operator shutdowns at Ballanaboy.

#### **1.5 Brexit and ROI Gas Market**

The Transporter reported that there was no further update from the January meeting.

## **2 Code Modification Proposals**

#### **2.1 A087 – New Framework for Suppliers in PPM Market**

The Transporter reported that since the last meeting it had furnished a proposed Deed of Covenant and an outline of the relevant amendments to the Code of Operations to the Working Group for review and was awaiting submissions.

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

The Transporter reported that A096 would remain under review. Its position remained that most of the provisions of the Proposal were included in the recent composite legal drafting for A096 and A096A now incorporated in the new version.

### 2.3 A099 - CNG Supply Point Capacity Setting

The CRU thanked parties for their submissions and raising this matter. The CRU highlighted that changing the Supply Point Capacity for any customer group would require significant analysis. The CRU noted that time would be required to complete such an analysis and that more data would be required to underpin the analysis. The CRU said, however, that on an interim basis and to allow time for data to be collected and analysed it would extend the soft landing period for the CNG offtakes. A question was asked as to whether a change to the code would be required to provide for that extension. The CRU indicated that it did not consider such a change was necessary.

ID	Action	Responsibility	Date Raised	Delivery Date
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings for CNG Offtakes	Transporter/CRU	25/03//2020	31/12/2020

### 2.4 A100 – Code of Operations amendment provisions to enable the offtake of Natural Gas at Haynestown, County Louth from the South/North Pipeline

Aine Spillane, Regulatory Affairs Manager at the Transporter, spoke to this Item, referring to Slides 12 and 13. She confirmed that the purpose of the Proposal was to insert a technical amendment in the Code of Operations to facilitate an Inter- Transmission System Operator Agreement between GNI and GNI (UK) (the owners of the South/North Pipeline) to enable the offtake of natural gas at Haynestown, County Louth. In an answer to one Shipper query Ms. Spillane confirmed that the residual capacity after facilitating this offtake was more than adequate to deal with any supply scenarios for Northern Ireland. There had been no written submissions to the review period which had expired on Friday 20 March. The CRU confirmed its approval for the Proposal and the matter was now proceeding to the Direction/Rationale and legal draft approval process.

## 2.5 A101 – Amendment to Code of Operations to facilitate the Extension of the Daily Exit Capacity Booking Window

This Code Modification Proposal was presented by Shipper Representatives from ESB, the proposers, and the meeting was referenced to Slides 14-18. The purpose of the Proposal is to extend the Daily Capacity Booking Window which currently ends at 03:00 hrs on the requested Capacity Booking Effective Date. The proposers stated that at the time this window closes a Shipper has incomplete information in relation to its capacity requirements at an Exit Point. As the cost of under-booking was high there was a tendency to overbook capacity which leads to cost inefficiencies which are passed on to end-users. .

ESB had considered and analysed 4 options;

1. Extend to coincide with the publishing of the final meter of the day by GNI on GTMS
2. Extend to end on D+X
3. Reduce the Exit Capacity Multiplier from 4 to 1
4. Allocate Exit Capacity to Shippers to match their final allocation (“implicit allocation”)

Option 4 is the ESB preference but they understand that, for systems reasons, Options 1, 2 or 3 (or a combination of them) may be faster for GNI to implement. Ultimately it considered Option 4 as the long term optimal solution. The Transporter stated that it saw merit in extending the 03:00 hrs deadline on a Gas Day and accepted that the Exit Capacity Multiplier could be reduced. The CRU stated that it had not taken a view on the Proposal yet and will be interested to hear feedback from the forum. The CRU directed the Transporter to circulate the Proposal Slides to the CMF Mailing List before COB that day notifying recipients that submissions in relation to the principle of the Proposal and, if relevant, the preferred option/s be submitted to the Transporter by COB on Friday 10 April.

## 2.6 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
<b>A087</b>	New Framework for Suppliers in PPM Market	GNI	Under review
<b>A096</b>	Data Sharing Agreement	GNI	Under Review/Legal Drafting for part finalised

Number	Proposal	Proposer	Status
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	Review complete. For Direction/Rationale
A101	Proposed extension of the Daily Exit Capacity Booking Window	ESB	Under review

## 3 Other Agenda Items

### 3.1 Recent Shipper IP Nomination Behaviour

The Transporter referred to Slide 20 and the proposal of GNI and National Grid to alter the methodology for setting the flow profile at Moffat. This would require a change to the existing Interconnection Agreement between both Transporters. For National Grid this involves an amendment to their UNC code. See link; <https://www.gasgovernance.co.uk/0720>. In Ireland there will be a review process as provided in Article 4 of the Interoperability and Data Exchange Rules Network Code. Moffat is the marginal source of gas for the system and therefore any delta between aggregate exit nominations and domestic production must be nominated at Moffat by the end of the day. The end of day quantity will revert to Shipper Confirmed Quantities at 23:00 hrs to ensure no over-delivery. The change to the flow profile methodology will allow both Transporters better profile and schedule flows even when Shippers have not nominated their full end of day quantity. The draft amendment to the Interconnection Agreement will be circulated in due course after which the required review period of two months will commence.

### 3.2 Shrinkage Gas

The Transporter confirmed that considerable progress had been made since the last meeting and it is intended to issue a Code Modification before the next CMF Meeting that will enable the Transporter procure Shrinkage Gas on the Marex Spectron from the start of the Gas Year 2020/21.

### 3.3 Gas and Electricity Interactions

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 introduction of Code Modification Proposal A101-*Proposed extension of Daily Exit Capacity Booking Window* which was mainly a concern of the PowerGen Sector.

### 3.4 Proposal to increase the oxygen content at biomethane entry points to 1% on Transmission Network

The Transporter confirmed that it was continuing with the review process and continued to solicit submissions from all stakeholders. The planned presentation from the Transporter’s HSQE team has been deferred to the June CMF Meeting.

### 3.5 Any Other Business

There was no item raised

## 4 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





## 5 Calendar of meetings for 2020

CMF Date	Location
29 <sup>TH</sup> January 2020 (Wednesday)	Dublin
25 <sup>th</sup> March 2020 (Wednesday)	Telco
17 <sup>th</sup> June 2020 (Wednesday)	Telco
19 <sup>th</sup> August 2020 (Wednesday)	Dublin
21 <sup>st</sup> October 2020 (Wednesday)	Dublin
16 <sup>th</sup> December 2020 (Wednesday)	Dublin

## 6 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		

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