

# Code Modification Forum Meeting Minutes

22 July 2015

*Location: The Hilton Hotel Kilmainham, Dublin*

<b>Attendees</b>		
	<b>Name</b>	<b>Representing</b>
1	Jack O'Connell	Advisor to the CER
2	Mike Ronan	Aughinish Alumina
3	Kevin Murray	Bord Gais Energy
4	Charles Shier	Bord Na Mona
5	John Melvin	CER
6	Barry Hussey	CER
7	Richard Harper (By Phone)	Ceres for Vermilion
8	Paul Hoey	Electric Ireland
9	Danny Mills	Electric Ireland
10	Kieran Adams (Partial)	Energia
11	Derek Scully	Energia
12	James White	Energia
13	Kirsty Ingham	ESB
14	Warren Deacon	ESB
15	Patrick Keating	ESB
16	James Tyrrell (Partial)	ESB Trading
17	Hazel Byrne (Partial)	Flogas
18	Mark Gannon	Flogas
19	Robert Irwin	Flogas
20	Avian Egan (Partial)	Gaslink
21	Kieran O'Sullivan	Gaslink
22	Aidan Bugler	Gas Networks Ireland
23	Maurice Keane	Gas Networks Ireland
24	Gerald Kenneally	Gas Networks Ireland
25	Tom Lyons (Partial)	Gas Networks Ireland
26	Douglas O'Brien (Partial)	Gas Networks Ireland

27	Úna O'Grady (Partial)	Gas Networks Ireland
28	Kevin O'Keefe (Partial)	Gas Networks Ireland
29	Kieron Carroll	Kinsale Energy
30	Brian McGlinchey	Kinsale Energy
31	Carol Spinks (Partial)	National Grid
32	Phil Hobbins (Partial)	National Grid
33	Phil Lucas (Partial)	National Grid
34	Stephen English	PTL
35	Gary Cotton	Shell
36	Olga Tseyukova	Shell
37	Stuart Wing	Shell Energy Europe
38	Lisa Fahy	SSE
39	Alan Scott	SSE
40	Richard De La Poer	Statoil
41	Paul McElvanna (Partial)	Tynagh Energy
42	Bryan Hennessy	Vayu

## 1. Code Modification Forum Minutes, Actions & Presentation Slides

- The minutes of the Code Modification Forum of the 3<sup>rd</sup> June were agreed and approved.
- One market participant expressed dissatisfaction with the CER decision not to establish a working group with the Electric Association of Ireland (EAI) and suggested that Gas/Electricity Interactions be raised on the Code Modification Forum agenda as required. The CER agreed to this request.
- The open actions from the meeting of the 3<sup>rd</sup> June were reviewed and discussed with most being referred to topics to be discussed later in the meeting.
- For supporting information to be read in conjunction with these minutes, please see the slides and the additional document presented at this meeting.

### **NEW ACTIONS**

<b>ID</b>	<b>Action</b>	<b>Responsibility</b>	<b>Date Raised</b>	<b>Delivery Date</b>
C428	Add Gas/Electricity Interactions as a standing item to the Code Modification Forum Agenda.	Transporter	22/07/2015	Next Code Mod Forum

## 2. Moffat Contractual Agreements Update

- The Transporter presented on the future arrangements for the Moffat IP and outlined the consultations on the TSO Agreements that are currently in process. This presentation, developed by all TSO's using the Moffat IP has already been given to UK shippers on Monday 13<sup>th</sup> July and will be delivered to Northern Ireland shippers on the 28<sup>th</sup> July. The consultation closes at 17:00 on the 5<sup>th</sup> August.
- The presentation described the proposed contractual model at the Moffat IP as follows:
  - There will be an Interconnection Agreement between National Grid and GNI (UK).
  - There will be two Tripartite Agreements between:
    - National Grid, GNI (UK) and Gas Networks Ireland; and
    - National Grid, GNI (UK) and PTL.
- In addition there will be transportation Agreements between:
  - GNI (UK) and Gas Networks Ireland; and
  - GNI (UK) and PTL.
- One market participant questioned the reference conditions and whether these would be an issue at the Moffat IP. The Transporter responded by saying that there was a provision in the Interoperability Network Code to allow the reference conditions to remain unchanged and that the TSO's in Ireland, Northern Ireland and the UK will be asking their relevant Regulator for permission to allow the existing reference conditions to remain in place at the Moffat IP.
- Following the presentation on Contractual Arrangements, the Transporter and Gas Networks Ireland presented the new Nominations process that will come into effect on 1 October 2015. As part of this presentation, the Transporter described the changes that will be made to GTMS and illustrated the presentation with screen shots of the proposed new screens.
- The primary changes to the nominations process can be described as:
  - There will be two forms of nomination, Single Sided and Double Sided.
    - Single Sided Nominations are to be used where the primary party and the counterparty in the nomination process are the same entity. This type of nomination can be used for either bundled or unbundled capacity as long as the parties on either side of the IP are the same.
    - Double sided can be used irrespective of who the counterparty is, therefore if a shipper wishes to nominate in a situation where it is not

the counterparty i.e. it holds unbundled capacity, it will have to use a Double Sided Nomination.

- The process also described that double sided nominations should be submitted to the relevant TSO but Single Sided Nominations will always be submitted to the Initiating TSO which in the case of the Moffat IP is National Grid. These nominations are submitted through National Grid's Gemini system. The internal processing of the Nomination was described, with it culminating in each TSO having a 'Processed Quantity' (PQ) from which Gaslink/Gas Networks Ireland and PTL, as the matching TSO's, will determine a 'Confirmed Quantity' (CQ) using the 'Lesser Rule' i.e. the lesser of the two PQ's.
- A question was raised by a market participant on how the PQs of the two TSO's could be different. A representative of National Grid responded by saying that it was very unlikely that they would be different at Moffat but at other IPs in Europe, one of the TSOs at an IP may have a Capacity validation rule that would cause it to change its PQ. The example given of such a validation rule is that a shipper may be required to hold capacity before it can nominate. This is not the case at Moffat.
- In an instance where both a Single Sided Nomination and a Double Sided Nomination is submitted, a question was raised on why the nominations would be rejected to which the Transporter responded by saying that GTMS as the matching TSO's system would not be able to accept the two nomination files.
- The Transporter took an action to answer a question posed on whether a shipper would receive a CQ of 0 if one of the parties in a DSN renominated and the other party did not.
- The Transporter confirmed that a shipper would be able to follow the progression of a nomination in GTMS.

## NEW ACTIONS

ID	Action	Responsibility	Date Raised	Delivery Date
C429	The Transporter is to determine whether a shipper would receive a Confirmed Quantity (CQ) of 0 if one of the parties in a Double Sided Nomination (DSN) renominated and its counterparty did not.	Transporter	22/07/2015	July 2015

### 3. Project Communications and Training

#### 3.1 EU Network Code Implementation Project Update

- The Transporter presented a high level overview of the schedule for the Network Codes Implementation project and highlighted the expectation that the changes to the legal drafting of the Code of Operations will be approved by the end of September 2015.

##### **Training**

- An update on the Shipper training plan was provided and includes one to one training for shippers in September in either of the Gas Networks Ireland Offices in Cork or Dublin. Shippers are requested to contact Gas Networks Ireland at the email address provided in the slide pack to schedule this training. The Transporter did stress that shippers should ensure that the appropriate staff attend the training as it will focus specifically on the auctions, nominations and allocations processes.
- A question was raised by a market participant on whether training would be provided on the XOServe system Gemini, which is being used for nominations. A representative of National Grid at the meeting stated that there was online training available and if shippers had difficulty accessing it they should contact XOServe directly.
- The National Grid representative also noted that shipper trials will take place on the 10<sup>th</sup> August. The deadline date for signing up for the shipper trials had passed but shippers who were interested were encouraged to try to sign up.
- A question was raised by a market participant on whether access would be provided for shippers to the Gas Networks Ireland test system to which Gas Networks Ireland responded by stating that access would not be provided because there was insufficient time and resources available. A market participant then asked if it would be possible to have Gas Networks Ireland review a shipper's XML files but again as resources are not available it would not be possible but Gas Networks Ireland added it would be making XML Schema and sample XML files available for shippers to use in their testing.

##### **PRISMA Browser Notice**

- The Transporter informed market participants of a PRISMA notice that, as and from the 30<sup>th</sup> November 2015, PRISMA will no longer support version 9 of the Internet Explorer browser. This may result in market participants not being able to access the platform or some of the functions not working properly.

### **ACER Public Consultation**

- The Transporter notified the forum of an ACER public consultation on suggested amendments to the Network Code on Capacity Allocation Mechanisms (Commission Regulation No. 984/2013). The amendments listed include:
  - The revised ENTSOG proposal for incremental capacity allocation; and
  - A change of the default auction calendar to move the yearly capacity auctions from March to June, the quarterly auctions from June to August and the rolling monthly auctions from the third Monday to the second Monday of each month.
- A market participant noted that moving the auctions as proposed did not really improve the situation as the auctions will still be taking place too far in advance of the effective dates of the products.
- A market participant asked if the Transporter was planning to respond to the consultation to which the Transporter responded that it had not yet decided.
- The CER responded stating that it is still considering the shipper proposal submitted at the last Code Modification Forum on the 3<sup>rd</sup> June to allow shippers to buy capacity for a non-annual period concluding in September 2016 at a pro-rata annual price..

### **PRISMA**

- In response to a shipper's question, the Transporter informed the meeting that the new PRISMA interface is due to be released on the test platform on the 7<sup>th</sup> October and on the production platform on the 30<sup>th</sup> November. This means that Shippers using the platform to book capacity from the 1<sup>st</sup> November will start out on the existing interface but will change to the new interface on the 30<sup>th</sup> November.

### **Balancing**

- The Transporter responded to an action from the last Code Modification Forum explaining the need for shippers to balance their portfolios. Reference was made to Part E Section 1.1.1 of the Code of Operations which requires that a shipper shall use reasonable endeavours to ensure that its inputs and outputs are equal in respect of each day. Reference was also made to Paragraph (5) of the Balancing Regulation (No.312/2014) by the Transporter and Article 4 of the same regulation by the CER which, in summary, place an obligation on *'network users to balance their balancing portfolios in order to minimize the need for transmission system operators to undertake balancing actions'*.
- Because some attendees perceived that there was a difference between the Code of Operations and EU Regulation 312/2014, the question of which held precedence arose. It was determined that the EU regulation held precedence but it was also stressed by the CER that the intention of each was the same and the obligation for a shipper to

balance its portfolio was upheld in both documents. The CER also noted that tools were being put in place to assist shippers with balancing their portfolios.

- The issue of penalties as proposed in the Balancing Business Rules was raised by a number of market participants with one suggesting that they should not be applied to shippers supplying power generators who have been asked to start flowing gas between the hours of 02:00 and 05:00 and where these shipper don't hold capacity and can't nominate as the renomination window has closed.
- The Transporter noted that the issue of Gas/Electricity interactions needs to be developed further.
- In response to a market participant request to provide a briefing note on balancing requirements, the CER responded by saying that when it signs off on the Balancing Business Rules, these will define how the Code of Operations is to be drafted in relation to Balancing.
- The CER reported that in its discussions with EirGrid, it had been notified that there were less than 10 instances of "*Synching*" in calendar year 2014 in the hours between 12:30 AM and 5:00 AM. A market participant responded by saying that "*Synching*" (Asking a shipper to start flowing gas) is not the issue but asking a shipper to increase their load during these hours is. The CER stated that EirGrid is to report back to the CER with a clarification on the number of occurrences.
- The CER agreed that it would look at Part E Section 1.1.1 of the Code of Operations when signing off on the Balancing Business Rules.
- A market participant suggested that Balancing in its current implementation should remain unchanged for a year to allow for an easier transition. The Transporter responded by saying that under Article 53 of Regulation 312/2014, the Balancing Network code is to be implemented by 1 October 2015. One possible option suggested by the Transporter is the introduction of authorized overruns.

## NEW ACTIONS

ID	Action	Responsibility	Date Raised	Delivery Date
C430	The CER is to respond to the proposal to allow shippers to buy capacity for non-annual period concluding in September 2016 at a pro-rata annual price.	CER	22/07/2015	Next Code Mod Forum



## 4. Code Modification Proposals

### 4.1 Code Modification Proposal A062 ‘Capacity Allocation Mechanisms (CAM)’

- The Transporter reported that the legal drafting consultation incorporating updates to *Part C ‘Capacity’* and *Part F ‘Administration’* of the Code was completed on the 1<sup>st</sup> July with one response that will result in a small change to Part F.
- This change, resulting in the inclusion of a new clause in Part F is covered in more detail under Code Modification A066 ‘Interim Arrangements’.
- Once completed, the updated legal drafting will be forwarded to the CER for approval.

#### NEW ACTIONS

ID	Action	Responsibility	Date Raised	Delivery Date
C431	The Transporter is to submit the updated legal drafting on Part ‘C’ and Part ‘F’ of the Code of Operations to the CER for approval.	Transporter	22/07/2015	August 2015

### 4.2 Code Modification Proposal A063 ‘Nominations, Imbalance Charges & Allocations: EU Network Code Implementation’

- The Transporter advised that Code legal drafting in respect of Part D ‘Nominations’ of the Code is still in development and it is planned that it will be issued to industry for consultation in July.

#### NEW ACTIONS

ID	Action	Responsibility	Date Raised	Delivery Date
C432	The Transporter is to issue the Code Legal Drafting on Part D of the Code of Operations to the forum in July.	Transporter	22/07/2015	July 2015

### 4.3 Code Modification Proposal A064 ‘Virtual Reverse Flow’(VRF)

- The CER responded to its action from the last Code Modification Forum on setting a target date for the implementation. The CER had mentioned a target date of April 2016 but stressed that there are competing priorities before this date can be confirmed. It therefore suggested that an Industry consultation be opened to ask market participants to prioritise the projects that they would like to see delivered by April 2016. The three projects being considered are:
  - Implementation of the enhanced Virtual Reverse Flow (VRF) Product;
  - Development of a Balancing/Trading Platform (“Increased Liquidity Measures”);
  - Access to Twynholm as an Exit Point from the Irish Gas Network via the Gaslink\GNI Code of Operations.
- The closing date for this consultation is Friday 7<sup>th</sup> August.
- The CER expressed its desire that all three projects be delivered by April 2016 but also stated that it had to be realistic and realise that there may not be sufficient resources available to complete all projects by this time. In the event that the three projects cannot be achieved by this timeline, the CER sought industry views on prioritisation.
- With respect to VRF, an industry participant asked about having a third party operate the system as had been raised at the last forum meeting. The CER responded by saying that it had considered this option but did not feel it would be realistic to have a party other than the TSO run the process even on an interim basis.
- The Transporter agreed to assess the feasibility of an interim increase in the amount of VRF currently available.
- An industry participant asked for a response to a letter sent to the Transporter by IOOA seeking clarification on VRF costs. The CER responded by saying that it was working on it but is awaiting an expectation of usage from the Transporter before it can respond.
- A market participant questioned a statement made by the Transporter at the June Code Modification Forum where it stated that the OBA (which at that point was under development) would provide protection for forward flow shippers in the event that, under current arrangements, VRF had been interrupted to zero. The market participant was seeking confirmation that if VRF nominations exceeded the 3.25Gwh limit specified in the OBA and needed to be interrupted, this will have an effect on Forward flow shippers. The Transporter agreed to seek clarification.

- The Transporter agreed to an action:
  - To assess the feasibility of an interim increase in the amount of VRF currently available; and
  - To explain the logic behind the current VRF rules including why shrinkage is applied to VRF, why in the case of an interruption, VRF can be interrupted to 0 and the justification for the 20GWh limitation with a worked example.

## **NEW ACTIONS**

<b>ID</b>	<b>Action</b>	<b>Responsibility</b>	<b>Date Raised</b>	<b>Delivery Date</b>
C433	Industry to respond to the consultation on preferences for phase 2 of the Network Codes implementation project.	Industry	22/07/2015	07/08/2015
C434	<p>The Transporter is to:</p> <p>Assess the feasibility of an interim increase in the amount of VRF currently available; and</p> <p>explain the logic behind the current VRF rules including why shrinkage is applied to VRF, why in the case of an interruption, VRF can be interrupted to 0 and the justification for the 20GWh limitation with a worked example</p> <p>Look at the existing VRF product to identify if more VRF capacity could be provided in the interim period before systemisation of the Enhanced VRF product is complete and whether or not a change could be made to the current situation where the Transporter interrupts to zero.</p>	Transporter	22/07/2015	Next Code Mod Forum
C435	The CER is to respond to the IOOA request seeking clarification on VRF costs.	CER	22/07/2015	Next Code Mod Forum

C436	The Transporter is to respond to a market participant query seeking confirmation that in the event that VRF nominations exceed the 3.25Gwh limit specified in the OBA, this will have an effect on forward flow shippers in the event that VRF nominations are interrupted to zero.	Transporter	22/07/2015	Next Code Mod Forum
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#### **4.4 Code Modification Proposal A065 ‘Financial Security Policy Amendments - CAM NC’**

- The Transporter reported that it had received three responses to the consultation on Version 2 of the Financial Security Business Rules.
- All responses expressed the opinion that the 2 days grace being offered in the event that a shipper had insufficient security available, should be extended. The proposed extensions ranged from 3 to 5 days.
- The Transporter reported that the CER had requested it to revise the Business Rules and increase the number of days to 3.
- The revised business rules have now been submitted to the CER and are awaiting approval.

#### **4.5 Code Modification Proposal A066 ‘EU Network Code Transitional Arrangements’**

- The Transporter reported that the legal drafting consultation incorporating updates to Part C ‘Capacity’ and Part F ‘Administration’ of the Code was completed on the 1st July with one response that will warrant a small change to Part F.
- This change will result in the inclusion of a clause in Part F to facilitate the alignment of existing Exit Capacity bookings with the Gas Year in accordance with the same Capacity transition process applied for Entry Capacity at IP’s.
- Once completed, the updated legal drafting will be forwarded to the CER for approval.

#### 4.6 Code Modification Proposal A067 ‘Congestion Management Procedures’

- The Transporter reported that the Business Rules for the Congestion Management Procedures (CMP) were issued for industry consultation on the 4th April 2015 with the consultation period closing on the 5th May 2015 without any responses.
- The CER had responded with a request for some minor changes which the Transporter completed.

The CER issued a direction to proceed with Legal Drafting on the 21<sup>st</sup> July.

#### NEW ACTIONS

ID	Action	Responsibility	Date Raised	Delivery Date
C437	The Transporter is to proceed with the Code Legal Drafting to implement the changes to the Congestion Management Procedures.	Transporter	22/07/2015	August 2015

#### 4.7 Code Modification Proposal A068 ‘Balancing: EU Network Code Implementation’

- The Transporter reported that the A068 Business Rules consultation closed on the 6<sup>th</sup> July with a total of five industry responses.
- These responses centered on concerns that some shippers have with balance and scheduling charges incurred between the hours of 02:00 and 05:00.
- There were a number of specific queries raised, which the Transporter has committed to addressing in Final Modification Report, to be issued on or before the 31<sup>st</sup> July.
- It is currently envisaged that there will be at least one change to be made regarding ‘Second Tier Imbalance Pricing’ (STIP).
- It was pointed out in the consultation that the proposed new STIP would be more penal than was previously the case. The Transporter has taken this into account and agreed to change the business rules to revert to the old STIP.

ID	Action	Responsibility	Date Raised	Delivery Date
C438	The Transporter is to issue final modification report on Code Modification A068 ‘Balancing: EU Network Code implementation’.	Transporter	22/07/2015	End of July

## 5. Regulation on Energy Market Integrity & Transparency

### 5.1 REMIT: Regulation on Energy Market Integrity & Transparency

- The CER reported that of the five responses received to the consultation requesting the Transporter to act as a Registered Reporting Mechanism on behalf of shippers, four of the respondents were in favour of the Transporter having a role in reporting.
- The CER also noted that there were two dates when shippers would be required to begin reporting transactions under REMIT:
  - October 7<sup>th</sup>, 2015 for transactions at organised marketplaces or exchanges;
  - April 7<sup>th</sup>, 2016 for 'non-standard' contracts. IBP trades fall into the second category, and therefore have a Go-Live of April 7<sup>th</sup>, 2016.
- As there are three big projects being considered for that timeframe, the CER felt that requesting the Transporter to put in place such a service would put undue pressure on the Transporter and therefore it will not ask the Transporter to provide such a service.
- One industry participant asked whether there was an obligation on the Transporter to provide this reporting service to which the CER responded that as GTMS is not an Organised Market Place (OMP), there is no obligation.
- The CER also confirmed the industry participant's assertion that if a trading platform was to be introduced in the future, it could be deemed to be an OMP thus placing an obligation on the Transporter.
- An industry participant noted that SEMO is reporting on behalf of the electricity industry and asked if SEMO could be asked to report on behalf of Gas shippers.

The CER stated that if Gas shippers were to use SEMO, they would have to provide their data to SEMO who in turn would provide it to ACER.

## 6. Update on the Corrib Gas Project by Shell

- A representative of Shell Ireland gave an update on the progress of the Corrib Gas project.
- The main points of the presentation were:
  - Testing of the P2 well has been completed and the rig in place is now being demobilised.
  - The repairs to the outflow pipe have now been completed.
  - Aghoose tunnel site reinstatement works are now nearing completion.
  - Final testing of the Terminal systems is ongoing.
  - Reverse Flow Commissioning is ongoing since November 2014.
  - Shell are waiting Revised Industrial Emissions Licence from the Environmental Protection Agency (EPA) for produced water discharge.
- The final step for production would be the Department of Communications, Energy and Natural Resources (DCENR) sign off under Petroleum Lease.
- Anticipated Entry Point Commencement Date for Bellanaboy Entry Point (as per the Code) is estimated to be 1 October 2015.
- An industry participant asked if there would be a commissioning period and if so, how long it was expected to be?
- Shell responded by stating that at the moment the commissioning period is estimated to be up to 6 months.

## 7. Update on Calorific Value (CV) by Gas Networks Ireland

- The main points of this presentation were that:
  - Currently 95% of all Gas on the Irish network comes through Moffat and the remaining 5% comes from indigenous suppliers and from storage.
  - The Code of Operations specifies the range that Calorific values must be maintained within as 36.9 – 42.3mj/scm.
  - The Calorific Value of gas from the Corrib field has been determined to be 37.7mj/scm which is within the allowable range.
  - The chemical composition of the Corrib gas was presented to the forum along with CV heat maps for summer where Corrib is expected to meet 100% of ROI gas demand and winter where it is expected to meet 56% of ROI gas demand.
- GNI stated that they have completed a full technical review of the associated asset base which confirms these assets are fit for purpose in relation to Corrib CV.
- Their conclusion is that Corrib gas meets the specification as per the Code of Operations Part G Section 1.1.1 but that its impact on the network will depend on the proportion of ROI gas demand met by Corrib.
- A market participant asked whether the Wobbe Index had been considered as well as CV variation to which GNI responded by saying that a full assessment, including Wobbe index had been carried and that this assessment would be published and made available.
- Another market participant asked when this assessment would be made available?
- GNI responded by saying that they could not give a definitive date but that it would be in the next few months.
- A request was made to shippers to convey the key details of this presentation to their customers.



## 8. Natural Gas Emergency Plan (NGEP) Update

- Gas Networks Ireland presented an update on the Natural Gas Emergency Plan (NGEP) Revision 3 which is currently being updated to include the following:
  - The change from Gaslink to Gas Networks Ireland;
  - Updated protocols with EirGrid and National Grid;
  - Addition of a new Entry Point at Bellanaboy (Corrib Gas); and
  - Code of Operations changes – Removal of ZIP and methodology for local categorisation.
- The revised NGEP will be tested as part of the 2015 Emergency Exercise. This part of the exercise is scheduled for 21 October 2015.
- The remaining schedule for the Emergency Exercise is as follows:
  - Emergency Contacts Exercise will take place during September 2015
  - The National Grid Exercise “Wolf” is planned for the 14<sup>th</sup> and 15<sup>th</sup> October 2015.
- One market participant questioned how a statement made during this presentation relating to shippers not being penalised or profiting from facilitating emergency arrangements would work?
- Gas Networks Ireland responded by saying that the Natural Gas Emergency Manager (NGEM) focus is on the security of the network and maintaining gas supplies to the domestic market. Business rules around compensation for shippers will have to be developed.

## Additional Questions Received

- A number of questions were raised towards the end of the meeting as follows:
- A market participant asked what shrinkage charges a shipper has to pay for using the Kinsale Energy storage facility. It was pointed out that these charges are not currently on shipper invoices. It was agreed that this would be added as an action to the forum minutes.
- Another market participant raised a number of questions on Energy Identification Codes (EIC) and the process of applying for them. In addition, this participant posed a question to the other forum members asking if they felt that their information had been used in applying for an EIC by some other entity. There was no response to this question.
- A request was made to harmonise the financial security credit ratings across the Gas and Electricity industry. It was agreed that this could be looked at in the future but would not be considered as part of the current financial security review.

## Administration

- The Transporter proposed that because of the impending implementation deadlines that the next three Code Modification Forum meetings be held as follows:

Meeting Date	Location
Wednesday 19 August	Cork
Wednesday 16 September	Dublin
Wednesday 14 October	Cork

- Attendees were asked to respond to the Transporter by close of business on Friday 24<sup>th</sup> July stating whether or not these dates would be acceptable.

## Action Log

Action Ref	Action	Responsible	Date Raised	Title	Response Date	Expected Delivery Date
C259	The Transporter is to issue letters to all End Users requesting that they sign End User Agreements.	Transporter	29/11/12	End User Agreements		Q1 2015
C282	The CER is to provide the Forum with a high level update of CAG at the next forum meeting.	CER	14/03/13	CAG		24/09/2014
C380	The Transporter is to proceed with the development of legal drafting for Code Modification A062 'Capacity Allocation Mechanisms at Interconnection Points'.	Transporter	16/10/14	Code Mod A062 'CAM		October 2015
C383	The Transporter is to consider issuing an NDM accuracy of forecasting report before Oct 2015.	Transporter	22/10/14	Code Mod A063 'Noms, Imbalances & Allocations'		October 2015
C399	The Transporter is to look at the existing VRF product to identify if more VRF Capacity could be provided in the interim period before systemisation of the Enhanced VRF product is complete and whether or not a change could be made to the current situation where the Transporter interrupts to zero.	Transporter	04/03/15	Code Mod A064 VRF		Next Code Mod Forum
C400	The Transporter is to Provide a cost estimation to the CER for systemisation of Enhanced VRF.	Transporter	04/03/15	Code Mod A064 VRF		To be determined

C404	The Transporter is to carry out a Trading platform Feasibility Study and submit its report to the CER following Industry consultation in September 2015.	Transporter	22/04/2015	Code Mod A063 'Noms, Imbalances & Allocations'		September 2015
C405	The Transporter is to propose the first set of interim measures for implementation in October 2015.	Transporter	22/04/2015	Code Mod A063 'Noms, Imbalances & Allocations'		Next Code Mod Forum
C408	The Transporter is to update the Financial Security Business Rules with the proposed changes and issue to the CER and to the CER for consultation.	Transporter	22/04/2015	Code Mod A065 Financial Security		Next Code Mod Forum
C409	The Transporter is to ensure that the concept of an Agent acting on behalf of a shipper is protected in legal drafting currently in development.	Transporter	22/04/2015	Code Mod A066 Transitional Arrangements		Next Code Mod Forum
C418	The CER is to revert at the next Code Modification Forum with an implementation date for VRF.	CER	03/06/2015	Code Mod A064 VRF		Next Code Mod Forum
C419	The Transporter is to reply to IOOA's letter and to the spreadsheet IOOA submitted proposing a methodology to implement Enhanced VRF by October 2015.	Transporter	03/06/2015	Code Mod A064 VRF		Next Code Mod Forum
C421	Industry to respond to the consultation on Version 2.0 of the Financial Security Business Rules.	Industry	03/06/2015	Code Mod A065 'Financial Security'		12/06/2015
C422	Industry participants are to respond on whether they would use a facility to align their exit capacity bookings with the Gas Year if it was made available.	Industry	03/06/2015	Code Mod A066 'Transitional Arrangements'		10/06/2015
C424	The CER is to review the A067, Congestion Management Procedures Business Rules with a view to approving same.	CER	03/06/2015	Code Mod A067 'CMP'		Open
C427	The CER is to review the industry Responses to the request for the Transporter to act as RRM and to issue a response.	CER	03/06/2015	REMIT		Next Code Mod Forum

C428	Add Gas/Electricity Interactions as a standing item to the Code Modification Forum Agenda.	Transporter	22/07/2015	General		Next Code Mod Forum
C429	The Transporter is to determine whether a shipper would receive a Confirmed Quantity (CQ) of 0 if one of the parties in a Double Sided Nomination (DSN) renominated and its counterparty did not.	Transporter	22/07/2015	Code Mod A063 'Noms, Imbalances & Allocations'		July 2015
C430	The CER is to respond to the proposal to allow shippers to buy capacity for non-annual period concluding in September 2016 at a pro-rata annual price.	CER	22/07/2015	Code Mod A066 'Transitional Arrangements'		Next Code Mod Forum
C431	The Transporter is to submit the updated legal drafting on Part 'C' and Part 'F' of the Code of Operations to the CER for approval.	Transporter	22/07/2015	Code Mod A062 'CAM		August 2015
C432	The Transporter is to issue the Code Legal Drafting on Part D of the Code of Operations to the forum in July.	Transporter	22/07/2015	Code Mod A063 'Noms, Imbalances & Allocations'		July 2015
C433	Industry to respond to the consultation on preferences for phase 2 of the Network Codes implementation project.	Industry	22/07/2015	Code Mod A064 VRF		07/08/2015

C434	<p>The Transporter is to:</p> <p>Assess the feasibility of an interim increase in the amount of VRF currently available; and</p> <p>explain the logic behind the current VRF rules including why shrinkage is applied to VRF, why in the case of an interruption, VRF can be interrupted to 0 and the justification for the 20GWh limitation with a worked example</p> <p>Look at the existing VRF product to identify if more VRF capacity could be provided in the interim period before systemisation of the Enhanced VRF product is complete and whether or not a change could be made to the current situation where the Transporter interrupts to zero.</p>	Transporter	22/07/2015	Code Mod A064 VRF		Next Code Mod Forum
C435	The Transporter is to respond to the IOOA request seeking clarification on VRF costs.	Transporter	22/07/2015	Code Mod A064 VRF		Next Code Mod Forum
C436	The Transporter is to respond to a market participant query seeking confirmation that in the event that VRF nominations exceed the 3.25Gwh limit specified in the OBA, this will have an effect on forward flow shippers in the event that VRF nominations are interrupted to zero.	Transporter	22/07/2015	Code Mod A064 VRF		Next Code Mod Forum
C437	The Transporter is to proceed with the Code Legal Drafting to implement the changes to the Congestion Management Procedures.	Transporter	22/07/2015	Code Mod A067 'CMP'		August 2015
C438	The Transporter is to issue final modification report on Code Modification A068 'Balancing: EU Network Code implementation'.	Transporter	22/07/2015	Code Mod A068 'Balancing'		End of July