



Code Modification Forum

Hilton Hotel, Kilmainham, Dublin Wednesday, 22nd April 2015

Agenda



- 1. Review of minutes from last meeting dated 4th March 2015
- 2. Review of Action Items from last meeting dated 4th March 2015
- 3. European Network Code Implementation Project Update
- 4. Code Modification Proposals
 - A062 'Capacity Allocation Mechanisms'
 - A063 'Nominations, Imbalance Charges & Allocations: EU Network Code Implementation'
 - A065 'Financial Security Policy amendments arising from introduction of Capacity Allocation Mechanisms (Regulation 984/2013) '
 - A066 'EU Network Code Implementation: Transitional Arrangements'
 - A067 'Congestion Management Procedures'
 - A064 'Virtual Reverse Flow: Enhanced flexibility and compliance with EU Network Codes'

Agenda



- 5. Other EU Updates
 - Regulation on Wholesale Energy Market Integrity and Transparency (REMIT)
- 6. AOB
- 7. Agree date of next Code Modification Forum Meeting
 - Proposed Date Wednesday 27th May 2015 Cork.



Review of minutes from last meeting dated 4th March 2015



Proposed Change to Minutes from last meeting Query



- •A request was made to include a reference to a question raised by a Producer on the progress of a physical connection on domestic Irish production with Northern Ireland to enlarge the market for Irish production. The CER indicated that one of the proposed PCI's for 2015 involves Physical Reverse Flow on the South North Pipeline which will look at Physical Reverse Flow between Ireland and Northern Ireland.
- It was agreed that this would be included in the minutes of this meeting and the minutes of the March would be approved as is.





2. Review of Action Items from last meeting dated 4th March 2015



Completed Actions



ID	Action	Responsibility	Status
C381	The Transporter is to review the process of moving from Annual to Monthly cash-out disbursements as proposed in the business rules for Code Modification A063 – 'Nominations, Imbalance Charges and Allocations'.	Transporter	Ongoing – To be included in the new Modification A068
C387	The Transporter is to report to the next Code Modification Forum regarding the status of (Balancing) trading platform options.	Transporter	Completed – To be presented at the Forum Meeting on 22 nd April 2015





Completed Actions

ID	Action	Responsibility	Status
C393	The Transporter is to prepare indicative examples demonstrating the 'Available VRF Capacity' calculation.	Transporter	Completed
C394	The Transporter is to provide Industry with information relating to the FS / Credit rules which are to be applied by adjacent Transporters at Interconnection Points.	Transporter	Completed
C395	The Transporter is to arrange for a standard copy of the market assurance re-qualification form to be sent to shippers now to allow them to prepare for the actual form in May.	Transporter	Completed Custom Form – therefore a sample is not available





Completed Actions

ID	Action	Responsibility	Status
C396	The Transporter is to check on whether validation will be required for each shipper location multi-location operations as part of the Market Assurance process.	Transporter	Completed
C397	The Transporter is to check with National Grid on the alignment with National Grid and the latest time for completion of secondary capacity trades.	Transporter	Completed
C398	The Transporter is to issue the Balancing Interim Measures Report to Industry.	Transporter	Completed





Ongoing Actions

ID	Action	Responsibility	Status
C259	The Transporter is to issue letters to all End Users requesting that they sign End User Agreements.	Transporter.	Ongoing. Scheduled to occur after Gas Networks Ireland (GNI) becomes the TSO.
C356	The CER is to endeavour to ensure that metering errors will be addressed under the implementation of the Interoperability and Data Exchange Network Code.	CER	Ongoing
C383	The Transporter is to consider issuing an NDM Accuracy of Forecasting Report before October 2015.	Transporter	The Transporter will deliver an 'Accuracy of Forecasting' Report by 1 October 2015.
C402	The Transporter is to plan to upgrade the existing VRF product to ensure CAM compliance by October 2015.	Transporter	Ongoing





Open Actions

ID	Action	Responsibility	Status
C380	The Transporter is to proceed with the development of legal drafting for Code Modification A062 'Capacity Allocation Mechanisms at Interconnection Points'.	Transporter	In Process
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	In Process
C400	The Transporter is to provide a cost estimation to the CER for systemisation of the Enhanced VRF.	Transporter	In Process
C401	The Transporter is to identify the date that systemisation of Enhanced VRF will be complete.	Transporter	In Process





3. EU Network Code Implementation Project Update



EU NC Project Communications and Training



Update

- One to One meetings have now been held with the majority of Shippers and Gaslink is endeavouring to meet with the remaining few;
- Version 1 of the Frequently Asked Questions (FAQ) have been published on the Gaslink website and will be updated on a regular basis;
- The first Shipper Workshop was held on Tuesday 21st April;
- The next Shipper Workshop is tentatively scheduled for late June or early July;
- PRISMA demonstrations are currently being held for Shippers on a one to one basis and will continue on an as needed basis.





4. Code Modification Proposals





A062 - 'Capacity Allocation Mechanism'



Code Modification A062:

CAM at Interconnection Points



Current Status

- Business Rules approved by CER in October 2014.
- Legal Drafting currently in development intend to merge A062 legal drafting with legal drafting for interlinked modifications:
 - A066 'Transitional Arrangements' (launched in January 2015).
 - A065 'Financial Security' (launched in January 2015).
- Legal drafting consultation capturing the three modifications above scheduled for May 2015.
- Legal drafting for CMP (Mod A067) to be incorporated at a later date.



Code Modification A062:

CAM at Interconnection Points



Proposed Changes

Within-Day Capacity booking window closing time at non-IPs:

- Not included in business rules
- Clarify that current closing time of 03:00 D will remain (and will not be moved back to 02:00 D with gas day change)

Closing time of secondary capacity

- Previous timing in business rules was 01:45
- Propose changing this to 03:00 to align with adjacent TSOs

Both items to be reflected in business rules.





A063 – 'Nominations, Imbalance Charges & Allocations: EU Network Code Implementation'

&

Operational balancing



Introduction:



Following a review of imbalance charge proposals and operational balancing options, it is proposed that *'interim measures'* be progressed as a means to:

- Imbalance charge proposals as included in the business rules are to be reviewed and will be deferred until the end of the interim period (1 – 5 years)
- In the meantime, an 'interim imbalance charge' will apply to reflect the balancing arrangements in place during the interim period
 - Imbalance charge methodology to be based on existing regime (with amendments)
 - Retention of tolerances on an interim basis may be possible to be phased out by end of interim period
- IBP 'balancing' and 'trading' platforms to be considered as part of interim and enduring solutions respectively





Interim Measures Report

Pöyry







INTERIM MEASURES AND MODIFICATION A068

22 April 2015

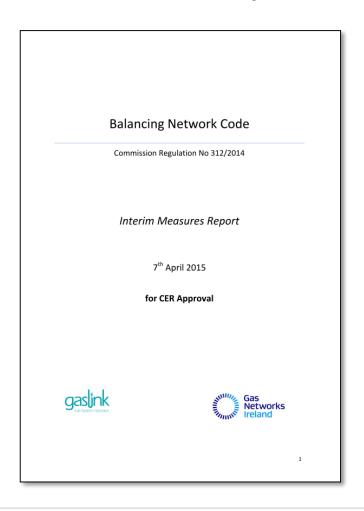
John Williams

INTERIM MEASURES REPORT

The Interim Measures are permitted by the Balancing Network Code where there is insufficient liquidity in the short term market to enable the full code to be implemented

- Interim Measures are designed to facilitate the development of liquidity
- Interim Measures to be applied in three main areas
 - Balancing Services
 - Tolerances
 - Interim Imbalance Cashout
- Transition period to 2019
- Annual reports to be required
 - Setting out progress to date
 - Development of the Interim Measures

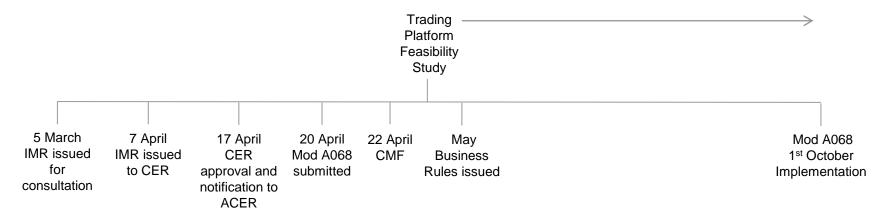
Code Modification required to take forward Interim Measures proposals





INTERIM MEASURES STATUS

The interim Measures Report has now been approved by the CER



- 3 responses received to the consultation with mixed views
- Respondent 1was broadly supportive
 - Urged that some of the proposed changes could be made sooner than proposed
 - Simplified balancing platform could be put in place for October 2015
- Respondent 2 considered that the NBP will continue to be the focus of trading and balancing services
 - Stressed the importance of a full consideration of the available options prior to a decision being made on a Trading **Platform**
 - Opposed any changes to the cashout regime
- Respondent 3 raised the uncertainty faced by generators and the issues raised with balancing in the last few hours of the Gas Day

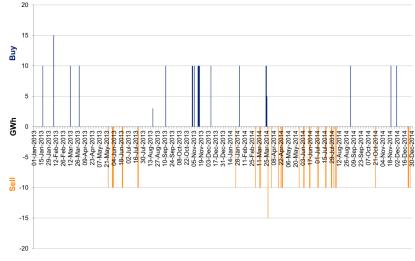


INTERIM MEASURES PROPOSALS - BALANCING SERVICES

Towards a Trading Platform?

- Maintain the existing structure of balancing services contracts from October 2015
- Consider a number of changes from April 2016 to further develop the regime
 - Take smaller/more frequent actions informed by Short Term Standardised Products
 - Move delivery point to the IBP
 - Standardised day-ahead/within-day products
 - Signal the intention of an action to stimulate bids/offers
- Consider how to use the NBP for balancing gas
- Further consideration of operational balancing as part of the Trading Platform Feasibility Study

Figure 2 – Balancing actions 2013/2014





INTERIM MEASURES PROPOSALS - TOLERANCES

Tolerances provide protection from marginal priced cashout but reduce incentives to balance

- Tolerances must be reduced to zero over the Interim period
- We have proposed a phased reduction in the IMR
 - LDM1 from 4.5% to [3]%
 - LDM2 from 12% to [9]%
 - LDM3 from 25% to [19]%
 - DM from 40% to [20]%
 - No changes to entry or NDM
- Do these go far enough?
 - Should Moffat entry tolerance be zero due to revised TSO arrangements post November 2015 - allocated whole
 - We are currently evaluating the impact of tolerance reductions on different sectors
 - Will make a proposal in the Business Rules to allow consultation
- Tolerance reduction impact monitored and further reductions in future years to be considered as part of the annual IMR

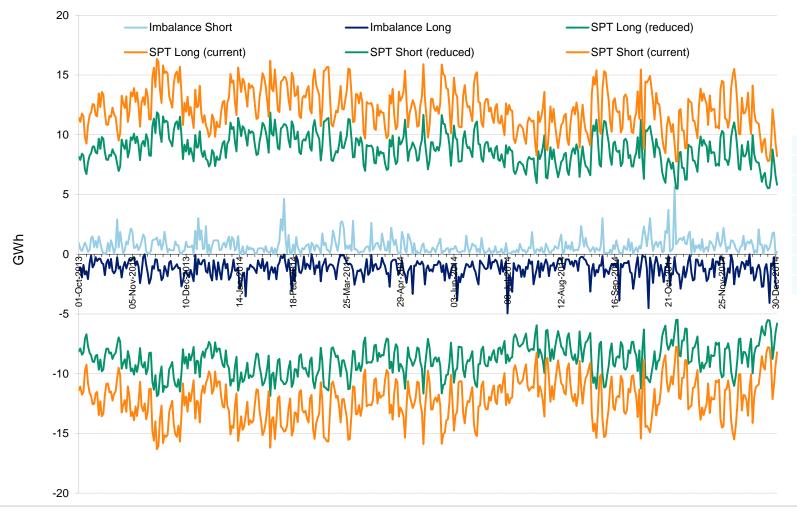
(20,000,000)

Figure 3 -First Tier Imbalances and Aggregate Shipper Portfolio Tolerance



REDUCING TOLERANCES (1)

Reducing tolerances to levels suggested in the Interim Measures report does not significantly change the overall aggregate tolerance level

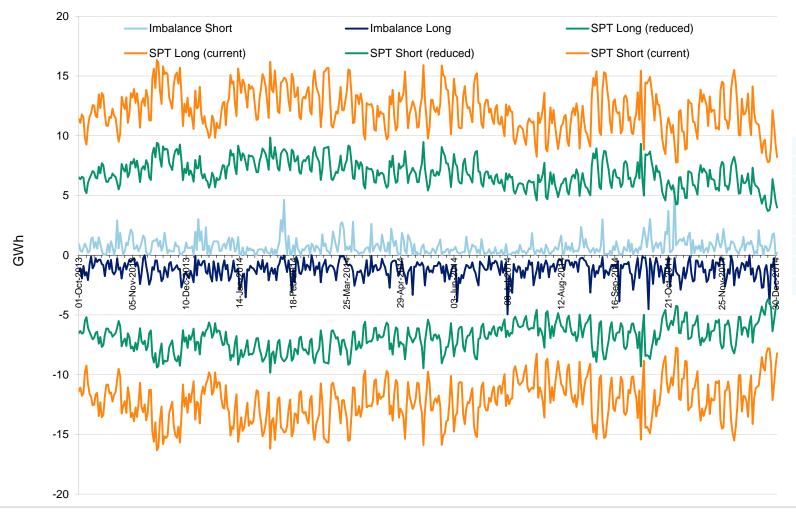


	%
LDM1	3
LDM2	9
LDM3	19
DM	20
NDM	2.5
Inch	1.5
Moffat	1.5



REDUCING TOLERANCES (2)

Reducing the entry tolerance at Moffat has a greater impact



	%
LDM1	3
LDM2	9
LDM3	19
DM	20
NDM	2.5
Inch	1.5
Moffat	0



INTERIM MEASURES PROPOSALS - IMBALANCE CASHOUT

Interim Imbalance Cashout prices can be based on a market proxy which is the current approach

- To increase the incentives to trade we have proposed a tightening of tolerances AND a first tier imbalance cashout differential
- From October 2015 via Mod A068
 - First Tier Buy Price € SAP + 2%
 - First Tier Sell Price € SAP 2%
- No change to Second Tier Imbalance price for October 2015
- From April 2016 it may be possible to introduce an element of the cost of balancing actions for Second Tier Cashout
 - If balancing services move to the IBP
- Ultimately the goal would be to move to a IBP derived dual cashout price with zero tolerances
- Further changes considered in future IMRs

Figure 4 – Missed trading opportunities



INTERIM MEASURES PROPOSALS - TRADING PLATFORM FEASIBILITY STUDY

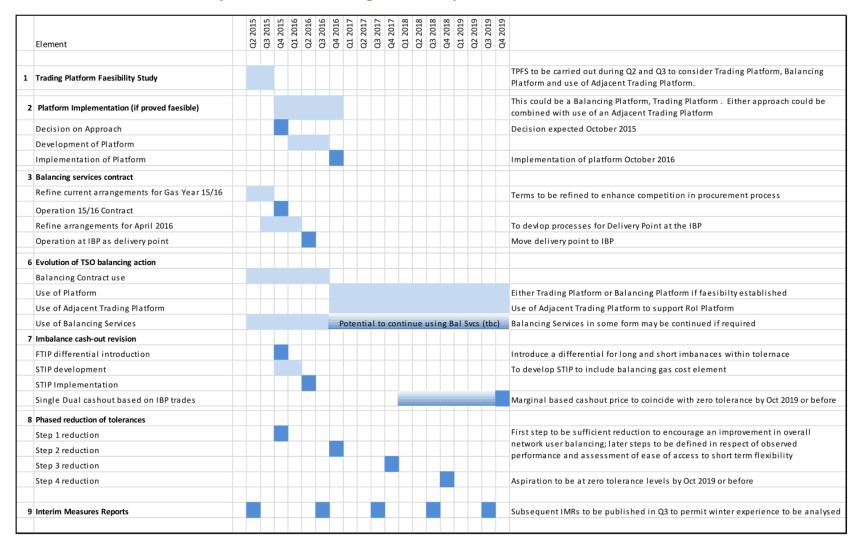
The requirement to move towards a competitive and liquid trading platform is one of the main objectives of the Balancing Code

- But how realistic is this since Rol is connected to the NBP?
 - Balancing Code requires that the development of liquidity within the balancing zone is addressed
- Gaslink/GNI will carry out a Trading Platform Feasibility Study that will asses
 - How a Trading Platform may be established in Rol
 - Whether a Balancing Platform is an option to transition to the Trading Platform
 - How the liquidity at the NBP may be used
- The assessment will consider the practicality, costs and benefits of establishing a Trading Platform
- To consider the balancing tools that are required
 - Including the definition of Short Term Standardised Products
- Feasibility study to report by September/October 2015
- Potential implementation in October 2016
 - Depending on the feasibility



TIMESCALES FOR INTERIM MEASURES TO 2019

Table 3 - Indicative transitional plan to consider Trading Platform implementation from October 2016





CRITERIA TO ASSESS LIQUIDITY

In order to assess the development of liquidity we will monitor the following and report in the annual Interim Measures Reports

Criteria	Expected direction of movement (increase/decrease)	
Number of trades at the IBP	Increase	
Number of counterparties at the IBP	Increase	
Volume of trades at the IBP	Increase	
Average trade size	Tbc reflective of STSPs	
Missed trading opportunities	Decrease	
Untradeable quantities	Decrease	
Aggregate First Tier imbalance	Decrease	
Aggregate Second Tier imbalance	Decrease	
Number and volume of ADTs	No increase	
Number and volume of Balancing Buy Actions	Increase (number) Decrease (volume)	
Number and volume of Balancing Sell Actions	Increase (number) Decrease (volume)	
Net balancing Gas Costs	Decrease	
Net Disbursements Account figure	Decrease	

Are there any others to consider?



MODIFICATION A068 – EU NETWORK CODE IMPLEMENTATION

Considers changes required as a result of Interim Measures and other areas

- Interim Measures
 - Reduction of tolerances
 - Daily imbalance cashout price
- Other items (originally in Section 5 A063)
 - After Day Trades
 - Scheduling Charges
 - Disbursements Account
 - Trade notifications / IBP Nominations
- Mod A068 raised on 20 April
- Business Rules to be developed and consulted upon





MODIFICATION A068 – COMPARISON TO A063 PROPOSALS

Main areas to be developed in the A068 Business Rules

Mod A063 reference	Mod A063	Mod A068	Comment
5.2 Tolerances	Removal of tolerances	Phased reduction of tolerances to commence in October 2015	Tolerances to be removed by 2019 at the latest
5.4 Applicable Price	Dual marginal cashout based on buy/sale of title products or multipliers	Differentials for first tier imbalance cashout	Changes to second tier imbalance cashout to be considered once balancing services delivery moves to the IBP
5.6 Disbursements Account	Monthly settlement and monthly neutrality charge	As A063	
5.7 After Day Trades and Scheduling Charges	Removal of ADTs Removal od scheduling charges at IPs	No change to ADTs from October Scheduling charges as A063	Use of ADTs will be monitored and proposal to remove may be considered in future
5.8 Trade Notifications / IBP Nominations	IBP Nominations matched within 0.5 hour Removal of requirement to hold Active Capacity	As per A063	





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A065 – Financial Security Policy amendments arising from introduction of Capacity Allocation Mechanisms (Regulation 984/2013)



Financial Security Proposal review:



Product	FS Required at time of Auction ?	Level of FS Required
Annual*	×	0 %
Quarterly	×	0 %
Monthly	✓	100%
Day-Ahead	✓	100%
Within-Day	✓	100%

^{*} Annual Products can be booked for the next 15 years at the PRISMA Auction





An early warning system will be provided to alert Shippers that they have used 80% of their posted Financial Security

Financial Security Key Changes At 100%, the shipper will be informed that they have 2 working days to replenish

Shipper will be required to move FS between GTMS and PRISMA but will not be restricted in doing so i.e. will not require the intervention of their KAM

Deposit Agreement will be modified to make it more flexible

Early Warning Proposal



Shipper reaches 80% of available credit

GTMS issues warning messages

Repeated messages may be sent at pre-determined levels

At 100%, Shipper has 2 working days to replenish

Shipper may continue to trade during this 2 Day period



Booking Monthly and Daily Capacity at interconnection Points



Shipper will be required to have full FS in place to participate in the PRISMA auction Financial Security is tracked on GTMS Shipper is required to move sufficient Security from GTMS to PRISMA Shipper can move this Security back to GTMS if necessary (KAM intervention not required)



Deposit Agreement Review



To facilitate shippers in meeting their financial security commitments within two days, it is proposed to change the requirements of the Deposit Agreement as follows:

Deposit Agreement Proposed Modifications

Only one Deposit Agreement will need to be signed by the Shipper

Shipper will have the option to use a non interest bearing account

Shipper will be able to add/withdraw as necessary

Once the Deposit is confirmed, the Shipper's FS level on GTMS will be updated





A066 – 'EU Network Code Implementation: Transitional Arrangements'



Update



Progress

- Code Modification A066 Business Rules were issued for consultation on 2nd April 2015;
- The consultation period ended on 17th April 2015;
- A total of four responses were received by the deadline.

Responses (slide 1 of 3)



Four Responses were received:

Response 1

supported the changes outlined in the Business Rules

Response 2

- Requested that the TSO & CER investigate an alternative to the proposed once a year annual capacity booking system
- Suggested that shippers could confirm by Sept 2015 if they wish to extend their annual bookings while having a monthly option to asses reducing / increasing those bookings until September 2016
- Requested that CER examine short term multipliers as part of the transitional arrangements and reduce in line with the quantums in the Tariffs Framework Guidelines
- Noted that it was not in a position at present to comment on phasing out of Unbundled Capacity



Responses (slide 2 of 3)



Response 3

- Noted that the booking period between 1st Aug 2014 to 23rd Sept 2015 for Annual Capacity bookings is 'restrictive' and that a Shipper would not be able to gauge in August / September 2015 what "shortened" annual capacity they require from say Jan 2016 to Sept 2016.
- Requested that section 3.1.2 (b) say that annual capacity can be requested 8 days prior to its activation date.
- Welcomed Entry Point Transfers
- Noted a typo in the date in section 3.1.3

Response 4

Transitional Capacity Arrangements at Interconnection Points

- Outlined that misalignment of Entry & Exit annual capacity bookings that arises as a result of the implementation of the CAM NC, is a cause of concern
- Requested that shippers be afforded the opportunity to realign their annual exit capacity bookings (at non-IPs) to the regular gas year i.e. effective 1st Oct.
- Proposed a solution



Responses (slide 3 of 3)



Response 4 (Cont'd)

Voluntary Bundling

- Queried:
 - Will single-sided nominations will still be facilitated for unbundled capacity, or only for bundled capacity?
 - What complications arise (if any) from having a mix of bundled and unbundled capacity at an IP from a nominations standpoint?

PRISMA

Awaits TSO Set up on platform

Moffat Agent transitional arrangements

Awaits further clarification at Workshop

Agent performing activities on behalf a Shipper

- NOTE: This topic is not covered in current A066 Modification, but may be included in Legal Drafting or a Modification at a later date.
- Requested modification of the Code to clarify arrangements where an agent may perform shipping activities on behalf of a Shipper
- "Per section 8 of Part I of the Code, a Shipper must generally interact with Gaslink Independent System Operator Limited ("Gaslink") (as Transporter) by way of "BGT Systems"
- Shippers are licensed by Gaslink to have access to and use of the "BGT Systems" for these purposes (see 12.4.2(a)(i) of Part I). However, Shippers are not permitted to sub-licence the use of the software, the hardware and any manual or other materials provided by the Transporter in respect of the BGT Systems (see 12.4.7(c)(iii)1.2(b) of Part I)".



Next Steps



- Discuss consultation responses with CER
- Propose final version of Business Rules to CER
- Issue Final Modification Report
- Publish final version of Business Rules as soon as approved
- Legal Drafting Consultation due to commence May 15th





A067 – 'Congestion Management Procedures'



CMP Overview



Surrender of Capacity

- Done through PRISMA.
- Both TSO's validate Bundled Requests.
- Submission deadline is 5 days prior to publication of Available Capacity at an auction.

OS & BB

TSO shall notify Adj. TSO when implementing mechanism.

LT UIOLI

For a Bundled Product, TSO shall notify adjacent TSO when initiating Withdrawal Process.

FDA UIOLI

- Doesn't need to be implemented until July 2016.
- National Grid & Ofgem have taken decision not to implement.
- CER decision on implantation pending.

CMP Status



- Business Rules distributed on 14 April 2015.
- Consultation period ends 5 May 2015.
- Contractual Congestion Report due April 2015.





A064 – 'Virtual Reverse Flow: Enhanced flexibility and compliance with EU Network Codes'



A064 Enhanced Virtual Reverse Flow



Current Status

- Version 3.0 of the Business Rules to be approved.
- Correction has been made to the Business Rules regarding the Bookable VRF Capacity Formula to account for physical flow on the South North pipeline;
- ❖ Bookable VRF Capacity = the lesser of ROI Forward Flow Nominations or 22.92 mscm/d and in either case minus the IP CSEP Offtake Quantity
- The Transporter's IT Department is currently working on developing a cost estimation for Enhanced VRF and an improved date that systemisation of the Enhanced VRF product will be complete.





6. Other EU Updates





REMIT – Verbal Update





9. Any Other Business





9. Date of next Code Modification Forum

Proposed Date: Wednesday 27th May 2015

Location : Cork







Thank you for your participation