



An Coimisiún  
um Rialáil Fóntas  
Commission for  
Regulation of Utilities

## **CODE OF OPERATIONS**

### **NOTICE TO SHIPPERS**

#### **PURSUANT TO PART F OF THE CODE OF OPERATIONS**

### **CODE MODIFICATION**

## **CODE MODIFICATION A091 MODIFYING THE OXYGEN CONTENT LIMIT FOR BIOMETHANE INJECTED INTO GNI'S NETWORK AND THE MODIFICATION OF THE OXYGEN CONTENT LIMIT AT EXIT POINTS**

### **COMMISSION RATIONALE**

Pursuant to Section 13 (1) of the Gas (Interim) (Regulation) Act, 2002, the Commission approves Code Modification A091 '*Modifying the oxygen content limit for biomethane injected into GNI's network and the modification of the oxygen content limit at exit points*'. This approved modification will come into effect on 21 February 2019. The rationale is set out below.

### **BRIEF OUTLINE OF THE CODE MODIFICATION**

This Code Modification amends the Code of Operations to increase the current oxygen limit of  $\leq 0.2\text{mol}\%$  to  $\leq 1\text{mol}\%$ , applicable to renewable natural gas (RNG) entry points and to exit points only. All RNG entry points will be subject to continuous monitoring of, inter alia, both dew point and oxygen content. For clarity, all other entry points will have to continue to comply with the current gas specifications within the Code of Operations.

### **REASONS FOR APPROVAL OF THE CODE MODIFICATION**

The current gas specification within the Code of Operations is not conducive to the economic use of RNG. A higher oxygen content is required to facilitate this. As such, Gas Networks Ireland

(GNI) raised Code Modification A091 to increase the oxygen content for RNG being injected into the natural gas system. The legal drafting setting out the proposed amendments to the Code of Operations was circulated to Shippers for comment along with a technical report (the Penspen report). The Penspen report assessed the impact of increasing the oxygen limit to 1% on amongst other things; the PE distribution network, the steel distribution and transmission network, the calorific value of the gas and operability of end user equipment. Please note that the Penspen report was reviewed and accepted by the CRU Safety. Shippers were given two weeks to respond with any comments to the legal drafting and Penspen report. No comments were received.

The CRU is in favour of the Proposed Code Modification as it will support the availability of RNG, which will assist in security of supply and allow users of the natural gas network to decrease their carbon intensity and assist Ireland as it moves to a low carbon economy. With the approval of this Code Modification, it is expected that the injection of the first renewable natural gas onto the distribution network will occur at Cush Co. Kildare in the coming weeks.