

Code Modification Forum

Wednesday, 3rd of September, 2025

Hybrid Meeting

Time: 10:30

| <u>No.</u> | <u>Item</u> | <u>Duration (minutes)</u> | <u>Time</u> |
|------------|---|-------------------------------|---------------|
| 1. | <i>Review of Minutes from last meeting</i> | 5 | 10:30 - 10:35 |
| 2. | <i>Review of Action Items from last meeting</i> | 5 | 10:35 - 10:40 |
| 3. | <i>GNI Scheduled Maintenance Update</i> | 5 | 10:40 - 10:45 |
| 4. | <i>Transmission Tariff Methodology Review update</i> | 15 | 10:45 - 11:00 |
| 5. | <i>Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network</i> | 10 | 11:00 - 11:10 |
| 6. | <i>Code Modification Proposal A112 - Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing</i> | 10 | 11:10 - 11:20 |
| 7. | <i>Code Modification Proposal A116 - Removal of Commissioning Tolerances and Tolerances associated with Plant Trips</i> | 5 | 11:20 - 11:25 |
| 8. | <i>Status of Code Modification Proposals</i> | 5 | 11:25 - 11:30 |
| 9. | <i>GNI Update on EU Affairs and Policy</i> | 30 | 11:30 - 12:00 |
| 10. | <i>Presentation on GNIs Annual Gas Report</i> | 20 | 12:00 - 12:20 |
| 11. | <i>Gas and Electricity Interaction</i> | 10 | 12:20 - 12:30 |
| 12. | <i>AOB Items / Next Meeting / Close of the CMF</i> | 5 | 12:30 - 12:35 |

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Meeting ID: 389 722 976 613

Passcode: W4oH3pd9



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Minutes of Virtual Meeting – 03 September
2025



1. Introduction

The Transporter opened the meeting and referred to a twelve item [Agenda](#) and the accompanying [Slide Deck](#).

2. Standing Items

2.1 Approval of Minutes

[Draft CMF Minutes](#) from the 10th of June, were issued on the 30th of July. The Transporter noted that they received no objection on the minutes. There were no comments at the meeting and the Minutes were adopted.

2.2 Review of Action Items

Action item C575, C606, C607 and C608 will remain open, while Action Items C603 and C604 were closed out.

2.3 GNI Scheduled Maintenance Update

Kieran Quill, Senior Market Analyst at the Transporter presented on Planned Maintenance, referring to Slide 8. Mr. Quill confirmed that the Transporter does not plan to undertake any maintenance activities during this gas year which will interfere with gas flows.

3. Transmission Tariff Methodology

Review Update

Tom O'Connor, Commercial Financial Partner at the Transporter, provided a presentation on the Transmission Tariff Methodology Review referring to Slides 10 - 16. In response to Mr. O'Connor's opening address, the Regulator detailed that under Article 16 of the Tariff Network Code this review must take place every 5 years and that the current review is running behind schedule. The Regulator further stated that, in conjunction with the Transporter, they have planned an industry workshop on the Tariff Methodology Review after the CMF Meeting on the 15th of October and hoped that the feedback from Mr. O'Connor's presentation today will help shape the format of the workshop.

Further to this workshop, the Transporter detailed its plan is to run the CMF Meeting as normal in the morning of the 15th of October in the Ashling Hotel. The Transporter stated that there will be an industry lunch after the CMF Meeting followed by the Transmission Tariff Methodology Review Workshop in the afternoon. The Transporter confirmed that they it would be sending out invites through the CMF Mailing List and to other relevant stakeholders who do not normally attend the CMF.

Following Mr. O'Connors presentation, a Shipper Representative noted that he considers that the timelines around this review seem tight, but takes comfort from the fact that the implementation date for the updated methodology is the start of the 2027/2028 Gas Year. He also noted that timelines need to be considered to ensure that industry stakeholders have adequate time to involve themselves in the process and asked that the Slides for the October Workshop be sent out in advance of the meeting date.

The Transporter informed the meeting that a Gas Quality Workshop had been planned for the October CMF Meeting but given that there will now be a Workshop on the Transmission Tariff Methodology Review, they do not feel that it is practical to have two in-depth workshops on the same day. For the proposed Gas Quality Workshop, the Regulator stated that they were of the opinion that there needed to be more input into the Workshop from parties, other than the Transporter, and agreed that it was prudent to push this Workshop out until a later date.

The Transporter noted that they will need participation from all parties in order for the Gas Quality Workshop to be a success. The Transporter referred to the significant gas quality update that it gave at the April CMF and confirmed its intention to organise the proposed updated workshop again at a later date. The chair of the EAI Gas Quality Working Group stated that he is happy to liaise with the Transporter on the matter.

4. Code Modification Proposals

4.1 A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on transmission network.

Kieran Quill, Senior Market Analyst at the Transporter, presented an update on Code Modification Proposal A111, referring to Slide 18. In response to Mr. Quill's presentation, the Regulator indicated that they received the requisite approvals from the CRU Safety Team on the updated safety case submission and are intend issuing their approval on the week beginning 08/09/2025.

4.2 A112 - Amendment to Code of Operations to Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing.

Douglas O'Brien, GPRO Manager at the Transporter, gave an overview of Code Modification Proposal A112, referring to Slides 20 - 23. Mr. O'Brien detailed that the Transporter is currently drafting provisions around a mid-month SoLR event impacting the DM/LDM Sectors, a SoLR affected Supplier GPRNs (different Supplier/Shipper) and minor drafting revisions around definitions and communications obligations on exiting Suppliers. He also stated that the Transporter has engaged with both the Regulator and the current SoLR on the matter and that updated Code Modification text has been shared with the current SoLR for comment. The Transporter plans on reissuing a new Code Modification Proposal for formal approval. Mr. O'Brien said that the new Code Modification Proposal, which will be designated A117, will be issued by the Transporter in the forthcoming week with existing Modification Proposal A112 simultaneously withdrawn.

In response to Mr. O'Brien's presentation, a Shipper Representative queried whether changes to the existing process will require a further modification to the code modification proposal. Mr O'Brien responded that he believes that there is enough flexibility in the rules to address future updates (withstanding significant changes to the process from the Regulator).

4.3 A116 - Removal of Commissioning Tolerances and Tolerances associated with Plant Trips

Kieran Quill, Senior Market Analyst at the Transporter, provided presented on Code Modification Proposal A116, referring to Slide 25. In response to Mr. Quill's presentation, the Regulator stated that it was intended to have the modification approved before the end of the month so that the provisions outlined in the modification can in place before the start of the 2025/2026 gas year.

4.5 Status of Code Modification Proposals

| ID | Title | Status | Reason for Status | Status End Date | Next Step |
|------|--|--------------------|---|-----------------|--------------------------------------|
| A099 | CNG Supply Point Capacity Setting | In abeyance | Awaiting the development of the CNG market and sufficient data to inform the next steps | TBC | NA |
| A111 | Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network | CRU Review | Extended hybrid review period has now ended | 15/10/2025* | CRU Determination |
| A112 | Amendment to Supplier of Last Resort provisions | Proposal Withdrawn | New proposal to be issued to the CMF | NA | New proposal to be issued to the CMF |
| A116 | Removal of Commissioning Tolerances and Tolerances associated with Plant Trips | CRU Review | Industry Review Period has now ended | 15/10/2025* | CRU Determination |

**Provisional status end date for the CRU Review Period, to be reviewed at the next CMF.*

5. Other Agenda Items

5.1 Presentation on GNIs Annual Report

Tom Lyons, EU Affairs & Policy Manager at the Transporter, presented an overview of GNIs Annual report referring to Slides 29 – 35.

5.2 GNI update on EU Affairs & Policy

Tom Lyons, EU Affairs & Policy Manager and Mary O'Mahony European Innovation & Policy Analyst at the Transporter, presented an update on EU Affairs and Policy, referring to Slides 37 - 40.

6. Next Meeting/AOB

6.1 Upcoming CRU Biomethane Consultation

The Regulator stated that it was in the process of finalising its' proposals for the consultation for internal review and intended to have the consultation published by the next CMF Meeting and would be happy to present on the matter once it is publicly available.

7. Open CMF Actions

| ID | Action | Responsibility | Date Raised | Status |
|------|--|------------------|-------------|---------|
| C575 | Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings | Transporter/ CRU | 25/03/2020 | Ongoing |
| C603 | Transporter to present an update on Code Modification proposal A112 at GMARG | Transporter | 01/04/2025 | Ongoing |
| C606 | Transporter to organise a gas quality workshop | Transporter | 01/04/2025 | Ongoing |
| C607 | Transporter to contact the EAI about presenting at the October Gas Quality Workshop | Transporter | 10/06/2025 | Ongoing |
| C608 | Transporter to give a Hydrogen Blending update at the October Gas Quality Workshop | Transporter | 10/06/2025 | Ongoing |

7. Upcoming Meetings

The next CMF Meeting is scheduled to take place on the 15th of October at the Ashling Hotel Dublin. This Meeting will include a stakeholder lunch and an industry workshop on the Transmission Tariff Methodology Review in the afternoon.

| CMF Dates | Location |
|-------------|-----------------|
| 12 February | Virtual |
| 1 April | Hybrid (Dublin) |
| 10 June | Hybrid (Dublin) |
| 3 September | Virtual |
| 15 October | Hybrid (Dublin) |
| 3 December | Virtual |

Next CMF Meeting



8. List of Attendees

| Name | Organization |
|--------------------|--------------|
| Conor Murphy | GNI |
| Kieran Quill | GNI |
| Stephen O’Riordan | GNI |
| Denis Twomey | GNI |
| Sean Mac An Bhaird | CRU |
| Tom O’Connor | GNI |
| Douglas O’Brien | GNI |
| Mary O’Mahony | GNI |
| Tom Lyons | GNI |
| Bernard O’Neil | GNI |
| David Grainger | BGE |
| Claire Walsh | Centrica |
| Anna Vikuna | Cepa |
| DJ Kiely | Flogas |
| Pranav kakkar | Epuki |
| Anthony Diccico | ESB |
| Emma O’Leary | EAI |
| Mark Leisk | SSE |
| Caoimhe McWeeney | Energia |
| Sam Clutterbuck | Ceres |
| Keith Deacon | Axpo |
| Michael Crowley | GNI |
| Brian McGlinchey | Vermilion |
| Andrei Vladareanu | Cepa |
| Gary Keane | Cepa |
| David Lindsay | CRU |
| Benjamin Oluyori | CRU |

Lauren Markey

CRU

Cian Fitzgearld

Energia



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Code Modification Forum – Hybrid Meeting

Wednesday, 3rd September 2025 – Hybrid Meeting

Agenda

1. Review of Minutes from last meeting
2. Review of Action Items from the last meeting
3. GNI Scheduled Maintenance Update
4. Transmission Tariff Methodology Review Update
5. Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network
6. Code Modification Proposal A112 - Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing
7. Code Modification Proposal A116 - Removal of Tolerances at RNG Entry Points
8. Status of Code Modification Proposals
9. GNI Update on EU Affairs and Policy
10. Presentation on GNIs Annual report
11. Gas and Electricity interaction
12. AOB Items / Next Meeting / Close of the CMF

1. Review of minutes from last meeting

- [Draft CMF Minutes](#) from the 10th of June, were issued on the 30th of July.



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2. Review of Open Actions

2. Review of open actions

| ID | Action | Responsibility | Date Raised | Status |
|------|--|------------------|-------------|-----------|
| C575 | Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings | Transporter/ CRU | 25/03/2020 | Ongoing |
| C603 | Transporter to present an update on Code Modification proposal A112 at GMARG | Transporter | 01/04/2025 | Completed |

2. Review of open actions

| ID | Action | Responsibility | Date Raised | Status |
|------|--|----------------|-------------|-----------|
| C604 | Transporter to issue notification to market participants requesting that they opt in to the email notification on lower Wobbe Index. | Transporter | 01/04/2025 | Completed |
| C607 | Transporter to contact the EAI about presenting at the October Gas Quality Workshop. | Transporter | 10/06/2025 | Ongoing |
| C608 | Transporter to give a Hydrogen Blending update at the October Gas Quality Workshop. | Transporter | 10/06/2025 | Ongoing |



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3. Maintenance Days

Kevin O'Keefe – Southern Regional Operations Manager

3. 2025/2026 Maintenance Days

- GNI does not plan to undertake any maintenance activities during this gas year which will interfere with flows.
- All maintenance activities on GNI infrastructure/equipment in relation to the Bellanaboy entry point will be co-ordinated with planned maintenance shutdowns by the Corrib operator.



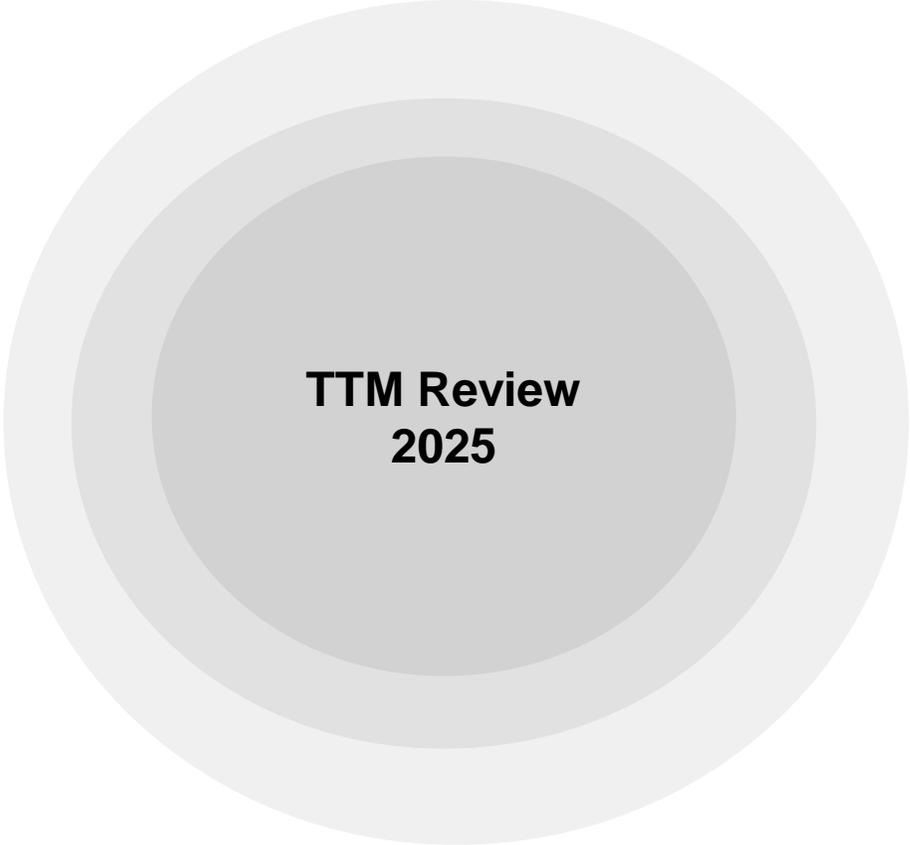
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4. Transmission Tarriff Methodology Review Update

Denis Twomey – Head of Commercial Finance

Tom O'Connor – Commercial Finance Partner



**TTM Review
2025**

1.

2019 Recap & 2025 plan

2.

TTM items - Status

3.

Recap – Current RNG Arrangements

4.

RNG Tariff Development/Items to consider

5.

Overview of TTM Scenarios

6.

Draft TTM Process & Timeline Overview

2019 Recap & 2025 plan

TAR NC (EU 2017/460)

EU tariff harmonisation: Transparent, consistent and predictable framework for cross-border trade

Regulation 2017/460 introduced to harmonise gas transmission tariffs across member states. Its goal is to make tariffs more transparent, consistent and reflective of the costs of using the transmission network. This creates a more predictable framework that supports cross-border trade and market integration

TAR NC 2019

- Overall compliance with TAR NC achieved
- Matrix methodology remained in place for Tx tariffs
- Tx RNG entry capacity tariff designed and included to Matrix
- Interruptible %'s established for Moffat & Gormanston VRF products
- Shrinkage gas cost included in tariff revenue
- Decision to exclude Twynholm as exit point

TTM 2025 (non-exhaustive list)

- Review & update matrix "inputs" (Exp.Constants/Network topology etc.)
- Consider any revisions to criteria on short-term multipliers
- Matrix vs CWD (Scenario development)
- RNG entry tariff development
- October TTM workshop

Matrix
Methodology

VS

Capacity Weighted
Distance (CWD)

Expansion
Constants

Annuitisation
Factor

Network
Topology

Cap/Comm
split

VRF
discount %'s

Entry/Exit
split

TTM items - Status

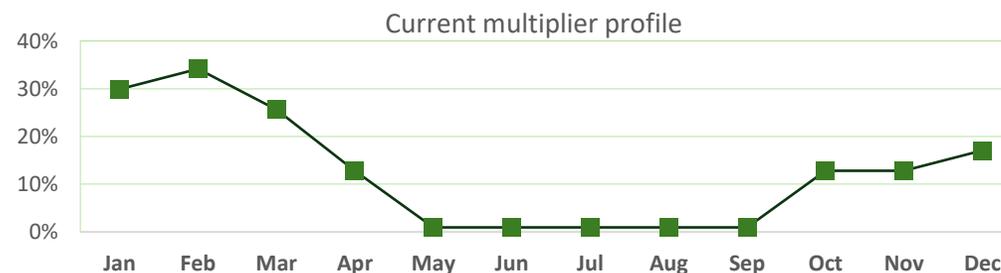
TTM items less likely to change

| Item | Current status |
|--------------------------|--|
| Capacity/Commodity split | 90/10 |
| Entry/Exit split | 33/67 |
| Shrinkage costs | Included in tariff setting |
| Twynholm exit point | Not included in tariff model currently |
| Isle of Man exit point | Not included in tariff model currently |

TTM items more likely to change

| Item | Current status |
|------------------------------|--|
| Expansion Constants | <ul style="list-style-type: none"> Dry - €7,810 (per Gwh/km) Wet - €8,783 (per Gwh/km) |
| Annuitisation Factor | 9.8% |
| Interruptible (VRF) factors | <ul style="list-style-type: none"> Pro factor - 8% A Factor (risk premium) - 10% Market integration factor (Moffat only) - 30% |
| Network Topology | 2019 topology exercise currently in place and used for tariff setting |
| Multipliers/Seasonal Factors | Multipliers within the bounds of the TAR NC. See chart |
| RNG tariffs | Tx Entry Capacity tariff in place. No equivalent Dx tariff in place |

Proposed technical update based on more recent data

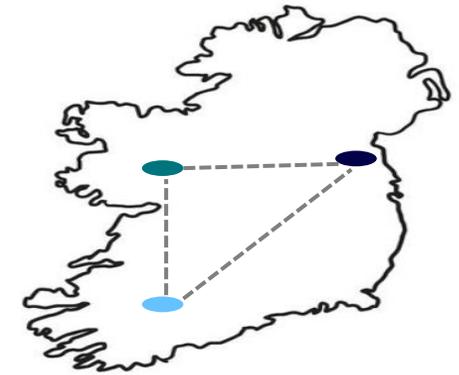


Recap – Current RNG Arrangements

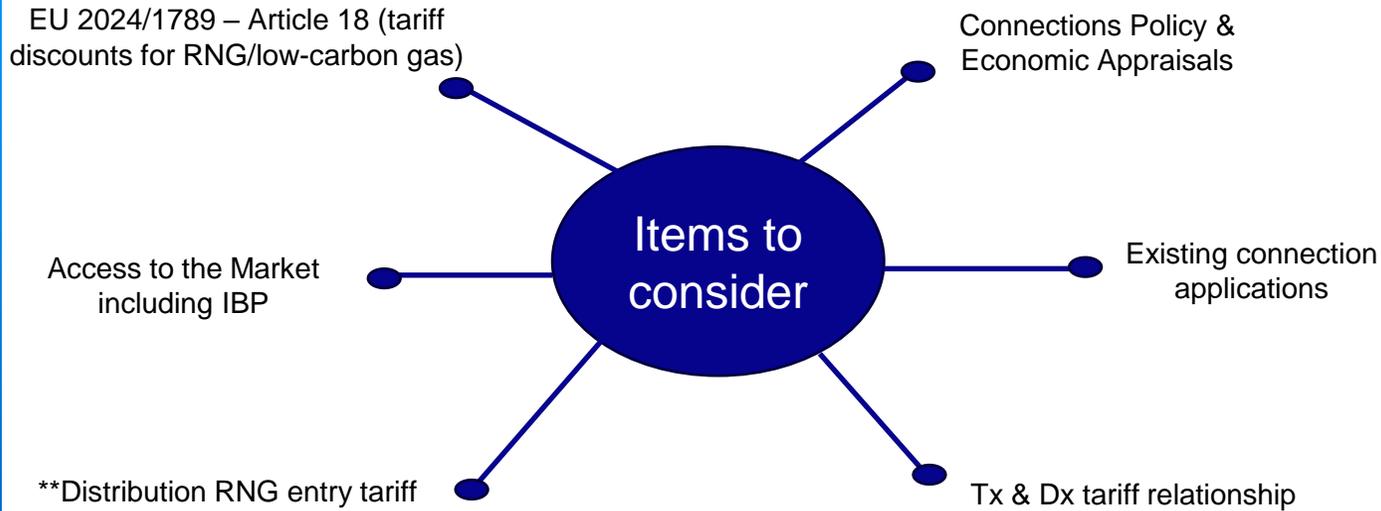
| Gas System | Current arrangements |
|--------------|---|
| Transmission | <ul style="list-style-type: none"> <input type="checkbox"/> Existing RNG Entry Capacity tariff (based on triangulated coordinates) <input type="checkbox"/> Same capacity tariff applied across all points <input type="checkbox"/> Equalised commodity tariff (no specific RNG commodity) |
| Distribution | <ul style="list-style-type: none"> <input type="checkbox"/> No formal RNG tariff in place <input type="checkbox"/> No capacity tariff at Entry |

Existing coordinates for RNG Entry Capacity Tariff

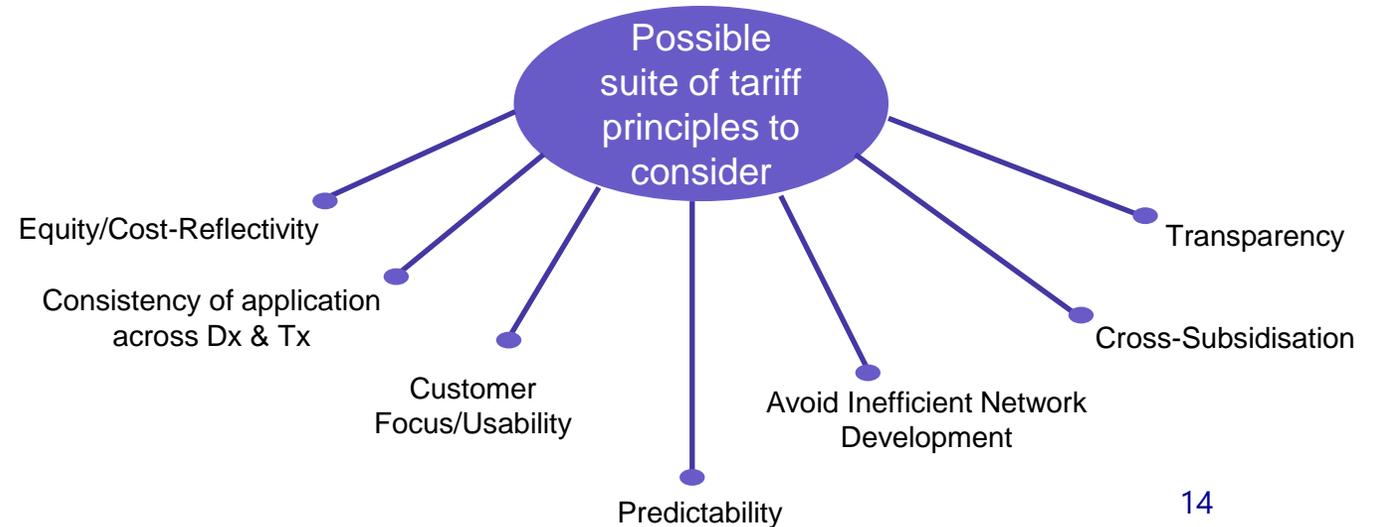
-  Coracunna (Mitchelstown)
-  Gormanston
-  Cappagh South



RNG Tariff development/Items to consider



*****Distribution is outside the scope of TTM. However, GNI & CRU looking to understand if similar development principles can be applied at Dx level also***



Overview of TTM scenarios

- Scenarios to compare tariffs from Matrix vs CWD
- Scenarios to focus on the short-term future usage of network
- Scenarios to incorporate updated “direct” model inputs (Exp.Constants/Annuity Factor/Network Topology)

Entry Points

- Moffat
- Bellanaboy
- RNG
- Inch

- Additional entry points to consider?
- Inch decommissioned – consider removal from tariff models?
- RNG existing entry point – consideration of any alterations to this for tariff scenarios

Demands/Booking profiles

- Anchored to NDP projections
- Consider multipliers/seasonal factors within this
- Potential interruptible capacity products/arrangements

Exit Points

- VRF
- Gormanston
- Twynholm
- IOM

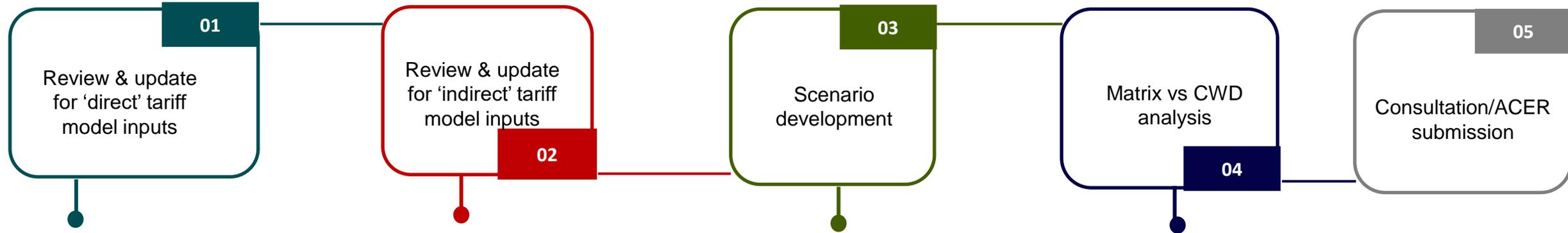
- Overall network topology being updated from 2019

Scenario sensitivities

- Consider different Cap/Comm and/or Entry/Exit splits for sensitivities

*Scenarios run on both Matrix and CWD models

Draft TTM Process & Timeline Overview



- Identify “direct” inputs to update to the methodology (Exp.Constants/Annuity factor etc.)
- Update where appropriate and prepare for inclusion to scenario modelling

- **Multipliers/SF's** - Analysis on network usage through TAR NC/other methods
- **VRF factors** – data collation on VRF use and other analysis to determine appropriateness of current factors

- Scope out scenarios for comparison to CWD
- Include outputs from process steps 01 & 02 in models

- Run scenarios through Matrix & CWD methodologies
- Compare and contrast results



❖ Presentation of TTM review to Code Mod forum

❖ Session on TTM items + RNG tariff development

❖ Consultation paper published

❖ Review & publication of consultation responses

❖ ACER's assessment received

❖ CRU review of ACER assessment

❖ Decision paper prepared

❖ Decision paper published

❖ Implementation for 27/28 tariffs



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5. Code Modification Proposal A111

Amendment to Code of Operations to increase oxygen limit for
biomethane entry points on transmission network

4. Code Modification Proposal A111 - Increasing the oxygen limit for biomethane entry points on the transmission network



Issued and circulated on 15 June 2023

Documents issued with Code Modification Proposal can be found [here](#).

- Explanatory Memorandum
- Proposed Legal Text
- Penspen Report
- Report Analysis Summary

Update

- Upper limit for oxygen is 0.2% for natural gas in Transmission and Distribution Networks
- RNG injected into the distribution network has upper limit of 1%
- Industry review date concluded 1 October 2024.
- Industry submissions to date can be accessed on slides 42 and 43 on the following [Slide Deck](#).
- **Next Steps:** Currently in CRU Review Period.

| ID | Title | Status | Reason for Status | Status End Date | Next Step |
|------|--|------------|---|-----------------|-------------------|
| A111 | Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network | CRU Review | Extended hybrid review period has now ended | 15/10/2025* | CRU Determination |

*Provisional status end date for the CRU Review Period, to be reviewed at the next CMF.



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6. Code Modification Proposal A112

Amendment to Code of Operations to the existing Supplier of Last Resort clauses to update new options on Capacity Products and revised arrangements around Supplier of Last Resort invoicing

5. Code Modification Proposal A112 – Supplier of Last Resort

Four SoLR documents previously issued at Code Mod Forum can be found [here](#), a revised pack will issue shortly.

Per Code Mod request, GNI provided an SoLR update to the August GMARG forum

Drafting revisions around;-

- A mid-month SoLR event impacting the DM/LDM Sectors;
- SoLR affected Supplier GPRNs (different Supplier/Shipper); and,
- minor drafting revisions (definitions/communications obligations on exiting Supplier).

GNI has engaged with both the CRU and BGE (as SoLR) on these revisions, next steps;

- Updated draft Code modification text has been shared with BGE for comment
- Reissue to Code Mod for formal approval

Next Steps: Finalise legal drafting following engagement with BGE, circulate to both GMARG (for information) and to the Code Modification forum.

| ID | Title | Status | Reason for Status | Status End Date | Next Step |
|------|---|--------------------|--------------------------------------|-----------------|--------------------------------------|
| A112 | Amendment to Supplier of Last Resort provisions | Proposal Withdrawn | New Proposal to be issued to the CMF | NA | New proposal to be issued to the CMF |



The Existing SoLR Arrangements were incorporated in the Code in or around 2006 following the inclusion of Section 21A in the Gas (Interim) (Regulation) Act 2002. Procedures were not documented



2 Gas NDM SoLR events took place in 2022



Code Modification proposal with proposed SoLR procedures circulated in 2023



GNI engaging with BGE and working towards issuing revised Code drafting and procedures

- Slight changes to previous SoLR Procedures to address:
 - DM and LDM site transfer arrangements for mid-month SoLR events
 - SoLR affected offtakes (e.g. where the SoLR Affected Shipper is not the Failed Supplier)
 - Potential of differing SoLR terms for different Sectors (NDM vs. DM & LDM)
- An updated SoLR Modification pack will circulate to the Code Mod group shortly
- Will also issue to GMARG, industry comments to be returned to the Code Mod Secretary

Two Proposed Approaches to DM/LDM Transfer

Primary: Portfolio transfer

- Transfer to entire DM/LDM portfolio of Failed Supplier / SoLR Affected Shipper to SoLR on any date within a month
- Suspension of rights of the Failed Supplier / SoLR Affected Shipper from Code of Operations
- SoLR is given limited access to the Failed Supplier / SoLR affected Shipper's GTMS account to manage the portfolio until the end of the SoLR term
- Transferred portfolio is maintained as a separate portfolio for the purposes of balancing and disbursement monthly credits/charges
- GNI's preferred approach

Secondary: Site(s) transfer at start of month

- Transfer to all or some of the DM/LDM portfolio of Failed Supplier / SoLR Affected Shipper to SoLR on the first of a month
- No requirement to suspend the rights of the Failed Supplier / SoLR Affected Shipper from Code of Operations
- SoLR manages the transferred sites from within its own GTMS account
- Transferred sites are integrated within existing portfolio of SoLR for the purposes of balancing and disbursement monthly credits/charges
- May be used in exceptional cases where suspension is not acceptable



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7. Code Modification Proposal A116

Removal of Commissioning Tolerances and Tolerances associated with
Plant Trips

6. Code Modification Proposal A116 - Removal of Commissioning Tolerances and Tolerances associated with Plant Trips

Issued and circulated on 8 May 2025

Documents issued with Code Modification Proposal can be found [here](#).

- Code Modification Proposal
- Explanatory Memorandum
- Proposed Legal Text

Update:

- This modification proposal is to delete references in the Code of Operations to Commissioning Tolerances and Tolerances associated with plant trips at LDM Offtakes. Neither of which tolerances are now operable on the transportation system.
- As a result of implementing this modification, GNI will be removing now irrelevant tolerances from its system operation and will be complying with the provisions of the Balancing Gas Regulation (EU) No. 312/2014.
- **Next Steps:** Industry Review period has been completed and the proposal is now under CRU Review.

| ID | Title | Status | Reason for Status | Status End Date | Next Step |
|------|--|------------|--------------------------------------|-----------------|-------------------|
| A116 | Removal of Commissioning Tolerances and Tolerances associated with Plant Trips | CRU Review | Industry Review period has now ended | 15/10/2025* | CRU Determination |

*Provisional status end date suggested to the CMF



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8. Status of Code Modification Proposals

8. Status of Code Modification Proposals

| ID | Title | Status | Reason for Status | Status End Date | Next Step |
|------|--|--------------------|---|-----------------|--------------------------------------|
| A099 | CNG Supply Point Capacity Setting | In abeyance | Awaiting the development of the CNG market and sufficient data to inform the next steps | TBC | NA |
| A111 | Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network | CRU Review | Extended hybrid review period has now ended | 15/10/2025* | CRU Determination |
| A112 | Amendment to Supplier of Last Resort provisions | Proposal Withdrawn | New proposal to be issued to the CMF | NA | New proposal to be issued to the CMF |
| A116 | Removal of Commissioning Tolerances and Tolerances associated with Plant Trips | CRU Review | Industry Review Period has now ended | 15/10/2025* | CRU Determination |

*Provisional status end date for the CRU Review Period, to be reviewed at the next CMF



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9. Presentation on GNI Annual Gas Report

Jason Hannon – National Policy Manager



gasnetworks.ie

Ireland's gas network

Keeping Ireland's energy moving

July 2025



A clear and focused overview of Ireland's gas network, highlighting key facts and figures relating to the gas network in 2024, and providing an overview of how we are supporting Ireland's transition to a climate neutral economy, including our plans for a fully decarbonised network.

Enriching content:

- Our vision is to be at the heart of Ireland's energy future
- The Gas Network - A Vital National Asset
- Supporting the transition to a climate neutral economy
- Our Pathway to a Net Zero Gas Network
- Our Decarbonisation solutions

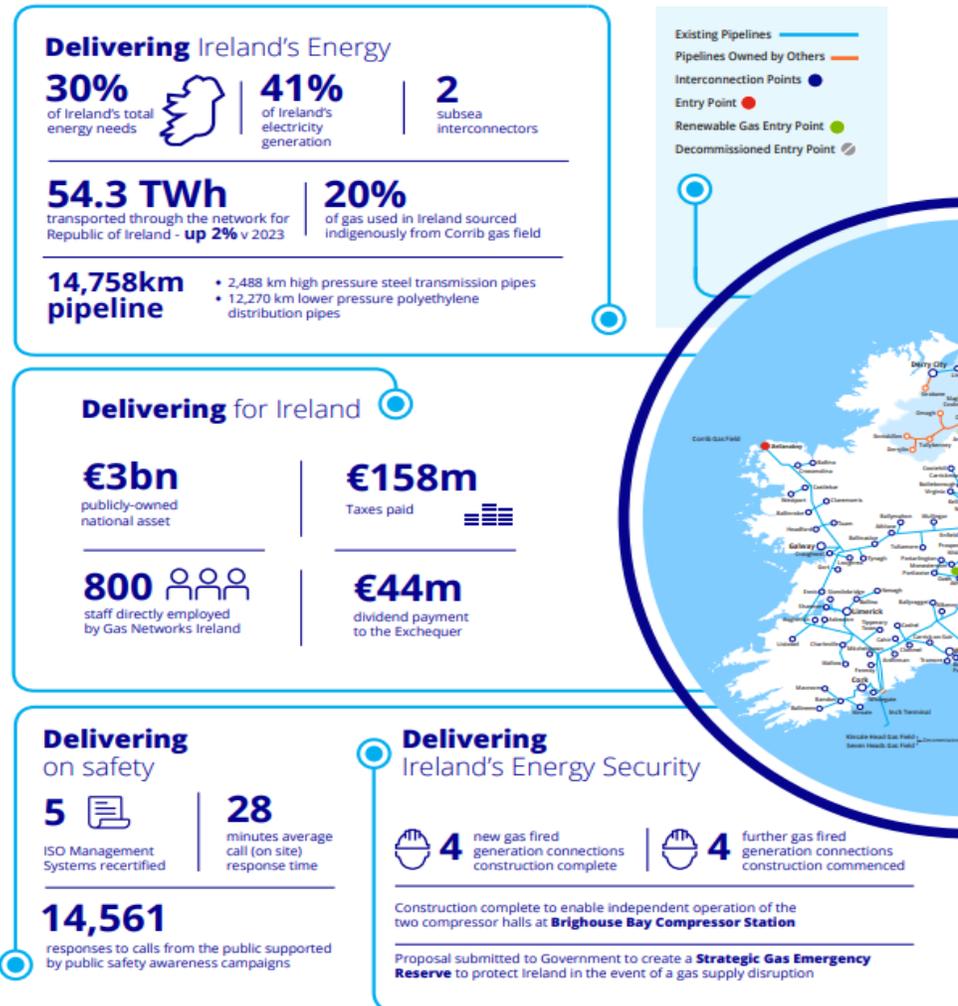
Launch supported by internal and external stakeholder engagement, public affairs, website promotion and animation for social media.

- *Fifth edition*

[Ireland's Gas Network - Keeping Ireland's Energy Moving](#)

Delivering for Ireland and Energy Security

Ireland's gas network a national asset of size and scale



- A vital national asset, valued at €3bn, owned by the people of Ireland
 - Central to **economic growth, job creation**, and attracting **foreign direct investment**
 - A **secure, reliable, resilient, and reputable** energy infrastructure
 - Delivering a **Government-led assessment** to enhance Ireland's security of energy supply
 - A key contributor to the **Irish economy** and Ireland's **energy future**
- Delivering 30% of Ireland's primary energy needs and generating 41% of Ireland's electricity
 - Provides **essential backup and flexibility** for the electricity grid
 - Ensures a **safe and secure gas supply** – 24/7, 365 days a year
 - Capable of **meeting demand in extreme weather conditions**
 - A cornerstone of Ireland's **energy reliability and resilience**

Delivering for customers and a sustainable future



Delivering for Customers

- **Serving over 720,000 customers connected in Ireland**
- **Connecting 23 counties** to the gas network
- **28,349 industrial and commercial customers** including power plants
- **68,000+ customer appointments** managed with **94% customer satisfaction score**
- Operating in **collaboration with gas producers; shippers and gas suppliers.**

Delivering for a Sustainable Future

- Committed to continued **progress in implementing the principles of sustainable development across all operations**
- **Published** in June 2024 **our Pathway to a Net Zero Carbon Network**
- Critical role in providing a **cleaner, competitive and secure energy supply for Ireland**, in particular, for power generation.
- **61 GWh of biomethane** transported through the gas network
- **Key progress made** in relation to **Network Technical Readiness** and **Hydrogen compatibility**

Delivering for Customers

111,937

PAYG meters

127,733

change of supplier actions facilitated

720,000+

customers in **23** counties, with 28,349 industrial and commercial customers, including power stations

1.86m

meter reads undertaken

3,200+

gas credit top up outlets in Ireland

68,000+

customer appointments kept with 99% compliance rate

31%

drop in complaints compared to 2023, lowest level raised in 10 years

94%

customer satisfaction score remains at an excellent score

Delivering a sustainable future

Pathway to a Net Zero Carbon Network
In June 2024, we published our Pathway to a Net Zero Carbon Network by 2045

Biomethane

- **61 GWh** injected into the gas network
- **2** new Biomethane connections
- **2** new partnerships with Biomethane producers

8 public and **3** private compressed natural gas (CNG) stations operational by the end of 2024

Scope 1 (direct emissions) 16% reduction from 2010 baseline

Scope 2 (indirect emissions) 43% reduction from 2010 baseline

Gas Networks Ireland appointed **UNSDG Champion**



5 sustainability awards in the year including Environmental, Social and Governance (ESG) award at the 50th Business and Finance Awards

Hydrogen

- Key progress made in relation to Network Technical Readiness and Hydrogen compatibility
- Participation in Government's Hydrogen interdepartmental Working Group
- Engagement with DCEE in relation to Ireland's designation of a "Hydrogen Network Operator"
- Supporting development of a European Network of Network Operators for Hydrogen (ENNOH)



€219,595

in financial support to local communities

90

community projects supported

Responsibly certified

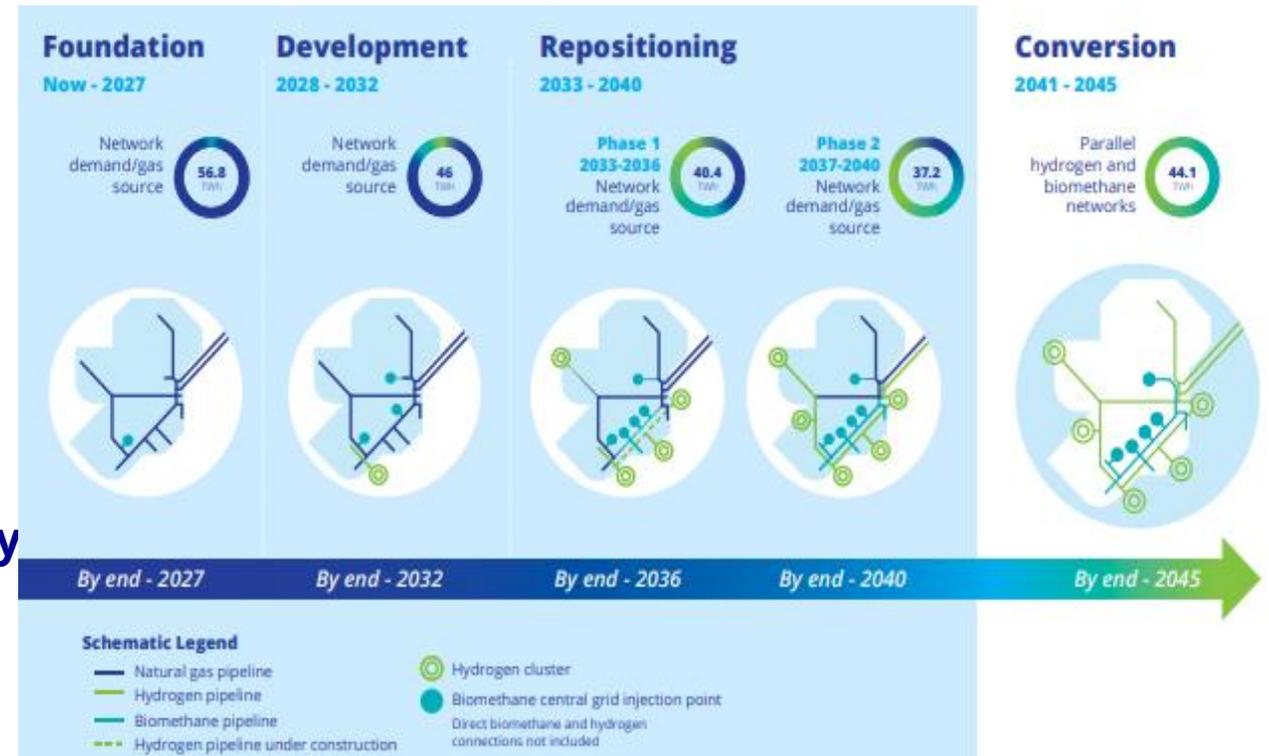
Certified to the Business Working Responsibly Mark
Achieved the Investing in Volunteers quality standard
Achieved IBEC (Keepwell mark) for our Health and Wellbeing Programme
Engineer's Ireland (CPD Employer of the Year) for our Female Development Programme



Our Pathway to a Net Zero Gas Network

Gas Networks Ireland published its ambitious **“Pathway to a Net Zero Carbon Network”** in June 2024 which highlights the essential role the national gas network can play in transitioning Ireland to a carbon-neutral economy.

- Focused on transporting **renewable gases** like **biomethane** and **green hydrogen**
- Aims to deliver a **secure, reliable, and fully decarbonised gas network by 2045**
- Timing depends on progress in **energy policy, technologies, and new energy sources**
- Committed to collaboration with **Government, regulators, and system operators** to build an integrated **net zero energy system**



Our Decarbonisation solutions: **Delivering on Biomethane in 2024**

A decarbonised gas network offers a cost-effective, low-disruption path to cleaner energy—especially for customers where electrification is not feasible.

- **National Biomethane Strategy (2024)** targets **5.7 TWh** of annual biomethane production by 2030 and to develop a biomethane industry of scale.
- The strategy also sets out that the **Renewable Heat Obligation Scheme (RHO)** will be introduced to financially support the sector along with an **initial tranche of capital grants (€40 million)** which **were fully subscribed by biomethane producers in 2024**.
- **61 GWh** of biomethane transported through the network **in 2024**
- **Central Grid Injection (CGI) facility** in Mitchelstown has entered the **construction phase**
 - Facility will be **operational by 2026**, contributing up to **12%** Ireland's 2030 biomethane target (**700 GWh/annum**) when at max capacity.
- **Four further contracts** were also signed for **direct connections** to the gas network by other biomethane producers.



Our Decarbonisation solutions: **Delivering on Gas Transport in 2024**

Transport accounts for over 20% of Ireland's emissions, and CNG offers a cleaner option for heavy vehicles, cutting emissions by up to 22%.

- **BioCNG reduces emissions by up to 90%**, offering a cleaner alternative to diesel
- **Three new refuelling stations** opened in 2024, bringing the total to 11 nationwide
- **Ireland's first dedicated BioCNG station** launched in **June 2024**, followed by another in September at Junction 14, Monasterevin
- The infrastructure rollout has driven **investment in gas-powered transport**
- Around 170 gas vehicles now operate in Ireland, with 95% using BioCNG
- Demand for Gas for Transport grew by 67% in 2024, **with BioCNG accounting for 90%** of all gas used



Our Decarbonisation solutions: **Delivering on Hydrogen in 2024**



Hydrogen is a carbon-free gas produced from electricity—called green hydrogen when made from renewables—and is ideal for **energy storage and decarbonisation**.

- **National Hydrogen Strategy (July 2023)** highlights hydrogen infrastructure as key to **energy security** and **competitiveness**
- **Active** member of the **government's interdepartmental hydrogen working group (and soon to be established task force)**, which oversees the delivery of the strategy and wider policy.
- Gas Networks Ireland is preparing the network to **safely transport and store hydrogen**
- Gas Networks Ireland has **invested in a Network Innovation Centre** at its Campus at Brownsbarn, Co. Dublin, for testing of various network and end user equipment for different concentrations of hydrogen
- **Partnered** with **Daltons Chancellors Mills** to test blending **up to 20% hydrogen** in their operations
- **The Hydrogen and Decarbonised Gas Market Package**, adopted in **May 2024**, setting out the market rules for the future hydrogen market, including the **establishment of ENNOH, the European Network of Network Operators of Hydrogen**
- Supporting **EU-level preparations for ENNOH's establishment in 2025** as a founding and board member of the group overseeing its development.



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10. GNI update on EU Affairs and Policy

Tom Lyons – EU Affairs & Policy Manager

Mary O'Mahony – European Affairs and Policy Analyst

EU Clean Industrial Deal (CID) – State of Play

- The core pillar of **the EU Competitiveness Compass** (Feb 2025) as the EC’s strategic roadmap for 2024–2029.
- Strategy to **accelerate decarbonisation** while **boosting competitiveness**. Targeted at energy-intensive and clean-tech industries in particular.
- Focus on **high energy costs, global competition**, and the **need for regulatory simplification**.

Current engagement

| Quarter* | Initiative | Description |
|----------|-------------------------------|---|
| Q2 2025 | State Aid Framework | Simplified rules to support clean tech & industrial decarbonisation. |
| Q2 2025 | Gas Storage Regulation | Proposals for a two-year extension to maintain energy security and market stability. |
| Q2 2025 | REPowerEU | EC roadmap to ending Russian energy imports presented in May. Targeted amendments of existing legislation, including RED, EPBD and EED. |
| Q4 2025 | European Grids Package | Consultation closed on 5 August 2025. Commission adoption planned for Q4 2025 . |

Watching brief

| Quarter* | Initiative | Description |
|----------|---|---|
| Q3 2025 | Network Charges Recommendation | Guidance on fair and efficient tariffs. |
| Q4 2025 | Industrial Decarbonisation Accelerator Act | Permitting reform and clean product labelling. |
| Q1 2026 | REPowerEU | EU countries to present national diversification plans – by 1 March, 2026 |
| Q2 2026 | Energy Performance in Buildings Directive (EPBD) | Deadline for full Transposition of the Directive - 29 May, 2026 |

Note: *indicative timelines – subject to change

EU Commission budget proposal 2028 - 2034

July 16th 2025

- European Commission (EC) unveiled draft proposals for the bloc's future **Multiannual Financial Framework (MFF)**, the €2-trillion budget that will run from 2028 to 2034.
- New **European Competitiveness Fund (ECF)**, of over €409 bn, covering areas from energy and climate to health, defence and digital. Horizon Europe and the EU Innovation Fund to have dedicated pots.
- **Four priority areas**, with €67.4 bn to be deployed for clean transition and industrial decarbonisation projects.
- New **Connecting Europe Facility** worth €81.4 bn will finance the completion of Trans-European Networks and foster the EU's green and clean transition in energy and transport. €29.9 bn set aside just for energy-related projects, a significant increase from current figures.



READ MORE: [here](#) / [here](#) / [here](#) / [here](#)

EU Policy / Regulatory Update

Gas & Hydrogen Market Package (GHP) (July 2024) / European Network of Network Operators for Hydrogen (ENNOH)

- GNI continues to engage with stakeholders and plan for implementation of Directive (EU) 2024/1788 pending **national transposition**.
- GNI continues to participate in the **establishment of ENNOH**.

European Commission EU Competitiveness Compass - EC's work for 2024-2029 term with a focus on 'competitiveness' and 'affordability'.

- The European Grids Package consultation launched in May and closed on 5 August. EU Commission adoption planned for **Q4 2025**.
- Aimed at **modernising** and **expanding Europe's energy grid infrastructure** to support the **clean energy transition**.
- Consultation sought **stakeholder input** to shape the new legislation aimed at **accelerating grid expansion, modernisation** and **permitting**, critical for integrating renewables, supporting electrification, and ensuring a cost-efficient, competitive energy transition across the EU.

Energy Performance in Buildings Directive (EPBD)

- The European Commission issued a **Guidance Notice on the Recast EPBD on the 30 June 2025**. Notice is to provide practical guidance on the new or substantially modified provisions of the recast EPBD that Member States need to transpose.
- **Full Transposition of the Directive is due by the 29 May 2026**.
- EU countries now required to submit their final **National Building Renovation Plans (NBRP)** by **31 December 2026**.

Methane Emissions Reduction Regulation (July 2024) [Methane emissions - European Commission](#)

- Regulation published in OJEU on 15th July 2024 and entered into force on 4 August, 2024. **Awaiting appointment of the competent authority**.

Policy / Regulatory Update

CRU's National Energy Demand Strategy (NEDS) (July 2024)

- The second NEDS progress report was published by the CRU in July. GNI are leading four actions and are a Supporting Body on a further four actions.
- 35 out of 53 Actions are on track, or have been completed.
- The CRU published its proposed decision on the Review of Large Energy Users (LEU) Connection Policy in February 2025 and does not propose any changes to the gas connections policy.

Ireland's National Biomethane Strategy (May 2024) / Renewable Heat Obligation (TBC)

- The Cabinet approved the drafting of the Renewable Heat Obligation Bill 2025 in July, providing a legislative basis for administration of the RHO when it goes live in 2026.
- The published draft Heads of Bill sets out the necessary functions and provisions of the scheme administrator (NORA) and includes an opening obligation rate of 1.5% in year 1, and 3% in year 2. While no final target level has been set, a review will take place in year 3.
- Specific measure to provide support to indigenously produced biomethane will be subject to formal (TRIS) notification at EU level and require justification for its inclusion.

Energy Security in Ireland to 2023 (November 2023)

- Following the approval by Government in March 2025, for GNI to progress the development of a State-led strategic gas emergency reserve, GNI are progressing the development of the project as a matter of priority. Engineering, procurement, planning and regulatory activities are progressing to support a Final Business Case.
- GNI and DCEE are progressing engagement on other actions under the Energy Security Package, including Actions 15, 17, 22 and 24.

Ireland's National Hydrogen Strategy (July 2023)

- 21 Actions identified in the Strategy.
- GNI continue to engage with DCEE in development of the Implementation Plan. The Hydrogen Task Force will oversee delivery of the Implementation Plan and is planning to have its first meeting in September. The task force will consist of three working groups (Safety & Regs, Infrastructure & Systems, Markets & Comms).

DCEE/DETE Taskforce on Carbon Capture Utilisation and Storage (CCUS) (March 2025)

- New CCUS taskforce established to facilitate the allocation of additional emission savings using CCUS for CAP 26 and to assist in the design of a policy position to realise those savings.
- DETE and DCEE co-chairing the taskforce. DCEE/DETE will receive a report from consultants in the near future.



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11. Gas and Electricity interaction

David Flanagan / Emma O'Leary – Electricity Association of Ireland



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12. AOB Items/Next Meeting/Close of the CMF

Upcoming Meetings

- The next CMF is scheduled to take place on the 15th of October at the Ashling Hotel Dublin.
- This CMF will include a stakeholder lunch and an industry workshop in the afternoon on the Transmission Tariff Methodology Review.

| CMF Dates | Location |
|-------------|-----------------|
| 12 February | Virtual |
| 1 April | Hybrid (Dublin) |
| 10 June | Hybrid (Dublin) |
| 3 September | Virtual |
| 15 October | Hybrid (Dublin) |
| 3 December | Virtual |

Next CMF Meeting





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Appendix Useful resources



EU legislation

[Hydrogen and decarbonised gas market](#)

[Methane emissions - European Commission](#)

[The Net-Zero Industry Act](#)

Competitiveness Compass

[EU Competitiveness Compass](#)

[Factsheet - Competitiveness Compass.pdf](#)

Action Plan for Affordable Energy

[Action Plan for Affordable Energy - communication in full](#)

[European Commission press release on the Action Plan for Affordable Energy](#)

[Questions and Answers on the Action Plan for Affordable Energy](#)

Clean Industrial Deal

[Clean Industrial Deal – Communication in full](#)

[European Commission Press release on the Clean Industrial Deal](#)

[European Commission Questions and answers on the Clean Industrial Deal](#)

Omnibus Package

[Omnibus Press Release](#)

[Omnibus I](#)

[Omnibus II](#)

[Questions and answers on simplification Omnibus I and II](#)