



Gas
Networks
Ireland

Code Modification Forum

Minutes of Hybrid Meeting- 4 December
2024

1 Introduction

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

2 Standing Items

2.1 Approval of minutes of previous meeting

[Minutes](#) of CMF meeting of 16/10/2024 were issued on 31/10/2024. The Transporter noted that they received one objection on the minutes from an Industry Representative on the 02/12/2024 relating to the recording of the discussion around Agenda Item 3.1. Business Rules for the Mitchelstown CGI. The Industry Representative indicated to the meeting that he had issues with the minutes in the past and there had been some amendments agreed. The Transporter confirmed that it was satisfied with its version of the minutes and did not accept the Industry Representatives' proposed text. After some discussion the CRU indicated that, as there was no consensus between the parties, that the Industry Representatives' version shall be attached as an Appendix to the October meeting minutes.

2.2 Review of Action Items

Action items C572 - C587 will remain open. In relation to C587 a Shipper Representative noted that this Action Item had been in place for a considerable time and expressed his frustration with the apparent lack of progress on the question of credit arrangements in an Emergency event which he had raised more than a year ago. The Transporter responded that this was a complex issue which required input from the CRU and ultimately DECC but the frustration of the Shipper Representative on the issue was justified and committed to providing a comprehensive update at the next CMF meeting.

Action items C596 - C599 were closed out in a bilateral meeting between the Transporter and the EAI. Further Action Item C601 was subsequently opened by the Transporter.

2.3 GNI Scheduled Maintenance Update

Kevin O'Keefe, Southern Regional Operations Manager at the Transporter, presented on

Planned Maintenance; referring to Slide 8, Mr. O’Keefe detailed that the Transporter does not plan to undertake any maintenance activities during the Gas Year 2024/25 which will interfere with gas flows. All maintenance activities on GNI infrastructure / equipment at the Bellanaboy Entry Point will be coordinated with planned maintenance shutdowns by the Corrib Operator.

3 Biomethane Update

3.1 Business Rules for the Mitchelstown CGI

Stephen O’Riordan, Wholesale Market Manager at the Transporter, provided an update on the Business Rules for the Mitchelstown CGI, referring to Slides 21-22. In response to Mr. O’Riordan’s presentation, an Industry Representative noted that he was speaking on behalf of a potential producer who had questions around the cost breakdown for use of the Mitchelstown CGI. Mr. O’Riordan stated that the Transporter is developing a Charging Methodology which was an Action Item outlined in PC5 and is presently engaging with the CRU on this matter but he believes that the Charging Methodology will be similar to what is currently in place for direct connections. The CRU noted that there is still need for more clarification on the Charging Methodology from the Transporter.

An Industry Representative queried whether changes made to the current issued Business Rules as a result of Industry or CRU feedback, would subsequently result in a second draft of the Business Rules being issued for a second consultation. Mr. O’Riordan stated that this is an iterative process and that he does not envisage minor changes to the Business Rules resulting in a second draft being published for consultation. However, he did acknowledge if there is a need for more significant changes, the Transporter would consider, in consultation with the CRU, the issue of a second draft for a second consultation.

Mr. O’Riordan also stressed that there will be the usual full Industry/CRU review of the subsequent Code Modification Proposal/s. The Transporter agreed to the request of the Industry Representative to circulate a marked-up draft of the finalised Business Rules ahead of the issue of the consequent Code Modification Proposal/s.

Responding to questions from a Shipper Representative, Mr. O’Riordan stated that the Charging Methodology proposed for Mitchelstown is in line with the current Connections Policy while taking account of the provisions of the Biomethane Strategy and various other government policy documents.

The Regulator stated that changing cost provisions for Biomethane Connections will need to be a product of a review of the wider Connection Policy. The Industry Representative responded to the Regulator by noting that this issue is very topical and worth fast tracking

through the CMF. He indicated to the Regulator that if there was a mechanism to bring forward the consultation on the Connections Policy it would be welcomed by industry.

3.2 Biomethane for Shrinkage

Padraig Fleming, Biomethane Program Manager at the Transporter presented an update on the Transporters Biomethane for Shrinkage proposal referring to Slides 24 – 26. In response to Mr. Fleming's presentation the Regulator noted that they are engaging with the Transporter on this matter and are looking at the proposal on its merits.

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 10. Mr. Quill stated that the hybrid review period for the Code Modification proposal had elapsed on 01/10/2024 and that the proposal is currently in CRU Review which has a provisional end date of 12/02/2024. This is a provisional status end date for the CRU Review Period which will be reviewed at the next CMF. The Regulator agreed to prioritise A113 and will aim for the same timelines for A111, however the Regulator noted that there are some outstanding queries in relation to A111.

4.2 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.

Kieran Quill, Senior Market Analyst at the Transporter, gave an overview of Code Modification Proposal A113 referring to Slide 12. He stated that the Transporter has been engaging with the Regulators Retail team on the Supplier of Last Resort provisions. In these discussions, the need to address a scenario where the failing Supplier is not the Shipper at the offtake was considered. To obtain a better understanding of the potential ramifications of this scenario, the Regulator requested information from Suppliers on their Shipper/Supplier arrangements. Once these responses have been considered by the Regulator, the Transporter will re-engage with the Regulator to progress the proposals.

4.3 A113 – Amendment to Code of Operations to amend gas quality requirements at Entry Points.

Kieran Quill, Senior Market Analyst at the Transporter gave an overview of Code Modification Proposal A113 referring to Slide 14. He stated that the hybrid review period for the Code Modification proposal had elapsed on 01/10/2024 and that the proposal is currently in CRU Review which has a provisional end date of 12/02/2024. This is a provisional status end date for the CRU Review Period which will be reviewed at the next CMF meeting. The Regulator agreed to prioritise A113 and will aim for the same timelines for A111, however the Regulator noted that there are outstanding queries in relation to A111.

4.4 A115 – Amendment to Code of Operations to remove Tolerances at RNG Entry Points.

Kieran Quill, Senior Market Analyst at the Transporter, presented an update on Code Modification Proposal A115, referring to Slide 16. Mr. Quill stated that the industry review period for the Code Modification proposal had elapsed on 13/11/2024 and that the proposal is currently in CRU Review which has a provisional end date of 12/02/2024.

4.5 Status of Open 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	12/02/2024*	CRU Determination
A112	Amendment to Supplier of Last Resort provisions	Industry Review	Discussions are ongoing with existing SOLR.	TBC	CMF Proposal Report to issue
A113	Amendment to Gas Quality Standards at Entry Points	CRU Review	Extended review period has now ended	12/02/2024*	CRU Determination
A115	Removal of Tolerances at RNG Entry Point	CRU Review	To allow the CRU to review the Code Modification Proposal Report	12/02/2024*	CRU Determination

5 Other Agenda Items

5.1 Gas and Electricity Generation

Jason Herbert, Policy Analyst at the Electricity Association of Ireland, provided a verbal update. Mr. Herbert noted that the EAI had a meeting with the Transporter which closed out various outstanding Actions at this Forum. He stated that the EAI are awaiting a response from the Transporter on a potential automated email alert in relation to gas quality changes and that he is currently working on a final report which will consolidate the feedback from all OEM reports. Mr. Herbert noted that two of his members are still waiting for final feedback from their OEMs and that these two parties will be engaging with the Transporter bilaterally in due course.

Mr. Herbert stated that only one power generator had indicated a potential equipment effect in an OEM report and acknowledged that there had been multiple extensions to the industry review period to facilitate the analysis of the OEMs.

A Shipper Representative mentioned that on the UK side that UNC have set up a subgroup that meets monthly to discuss gas quality and also works as the interface between electricity and gas operators. The Transporter agreed to taken an Action Item to set up a meeting with the EAI to discuss the potential merits of setting up a similar group in the ROI and to discuss the automated email alert on gas quality. Action Item 601 was opened by the Transporter.

5.2 Presentation on GNI's Core Flexibility Report

Siobhan O'Halloran, Future Networks Manager at the Transporter, presented the Transporters Core Flexibility Report, referring to Slides 28-35. The Transporter noted that all communication regarding the Webinar and Questionnaire for the report will be circulated through the CMF Mailing list.

5.3 GNI update Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) Recast

Ryan O Connell, Market Development Analyst at the Transporter, presented an update on the REMIT Recast, referring to Slides 38-40. A representative from the Electricity Industry pointed to a bilateral meeting they had with the Transporter where they requested an EU Affairs Standing Item at the CMF.

The Transporter noted that they are happy to provide this update subject to agreement with the CRU. However, the Transporter stressed that these updates will be high level and it will be up to the participants to do their own due diligence reviews on developing energy issues emanating from the EU. The Transporter also specified that they would welcome ACER updates which the CRU might consider providing on a case by case basis.

6 Next Meeting/AOB

The next meeting is a virtual meeting provisionally scheduled for 12/02/2024.

The Transporter noted that they issued the [CMF End of Year Report](#) on the 03/12/2024. The Transporter stated that this Report would be reviewed and finalised (including the 2025 meeting calendar) via an ad-hoc meeting on the 29th of January 2025. GNI request written comments on the Report by 24th of January 2025.

7 Open CMF Actions

ID	Action	Responsibility	Date Raised	Status
C572	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/03/2019	Ongoing
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/ CRU	25/03/2020	Ongoing
C587	Transporter to review credit arrangements in the Emergency Section of the Code and provide an update at the next CMF	Transporter	18/10/2023	Ongoing

C600	Transporter to provide an updates on North South flows	GNI	16/10/2024	Ongoing
C601	Transporter to set up a bilateral meeting with the EAI to discuss automated email alerts for gas quality changes and a potential subgroup for gas quality changes.	GNI	04/12/2024	Ongoing

8 Calendar of meeting for 2024

	CMF Dates	Location
Next CMF Meeting 	12 February	Virtual
	2 April	Hybrid (Dublin)
	18 June	Hybrid (Dublin)
	3 September	Virtual
	15 October	Hybrid (Dublin)
	3 December	Virtual

9 Attendees

Name	Organization
Conor Murphy	GNI
Kieran Quill	GNI
Stephen O’Riordan	GNI
Ryan O’Connell	GNI
Padraig Fleming	GNI
Michael Murphy	Ormonde
Tom Nolan	Ormonde
Philip Smyth	Energia
Stephen O’Hare	GMO
Jason Herbert	EAI
Alexandra Murphy	EAI
Aine Spillane	GNI
David Grainger	BGE
Bryan Hennessy	Flogas
Paul Ahern	GNI
Kevin O’Keeffe	GNI
Adam McCallion	GMO
Eoin Brennan	Flogas
Ronak Boman	Flogas
Sam Clutterbuck	Ceres
Paul Murphy	ESB
Therese Lannon Crean	SSE
Stephen English	GMO
Claire Walsh	Centrica
Michael McEniry	Nepkin
Gillian Farrelly	Flogas
Paul Hoey	Electric Ireland
Kaith Deacon	Axpo
Paul Crowley	GNI

Anthony Foody	ESB
Rasmus Jensen	GNI
William Carr	ESB
Brian McGlinchey	Vermilion
Siobhan O'Halloran	GNI
Padraic Duffy	CRU
Emerson O'Callaghan	CRU
David Lindsay	CRU

Code Modification Forum

Wednesday, 4th of December 2024

Virtual 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>Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network</i>	5	10:45 - 10:50
5.	<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>	5	10:50 - 10:55
6.	<i>Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points</i>	5	10:55 - 11:00
7.	<i>Code Modification Proposal A115 - Removal of Tolerances at RNG Entry Points</i>	5	11:00 - 11:05
8.	<i>Status of Code Modification Proposals</i>	5	11:05 - 11:10
9.	<i>Gas and Electricity Interaction</i>	10	11:10 - 11:20
10.	<i>Update on Mitchelstown CGI</i>	10	11:20 - 11:30
11.	<i>Update on Biomethane for Shrinkage</i>	10	11:30 - 11:40
12.	<i>Presentation on GNIs Core Flexibility Report</i>	15	11:40 - 11:55
13.	<i>GNI update on Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) Recast</i>	15	11:55 - 12:10

14.	<i>AOB Items/ Next Meeting / CMF End of Year Report / Close of the CMF</i>	20	12:10 - 12:30
-----	--	----	---------------

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 351 083 046 048

Passcode: wczawp

[Download Teams](#) | [Join on the web](#)

Code Modification Forum – Virtual Meeting



Wednesday, 4 December 2024 – Virtual Meeting

Agenda

1. Review of Minutes from last meeting
2. Review of Action Items from the last meeting
3. GNI Scheduled Maintenance Update
4. Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network
5. 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
6. Code Modification Proposal A113 - Amendment to Gas Quality Standards at Entry Points
7. Code Modification Proposal A115 - Removal of Tolerances at RNG Entry Points
8. Status of Code Modification Proposals
9. Gas and Electricity Interaction
10. Update on Mitchelstown CGI
11. Update on Biomethane for Shrinkage
12. Presentation on GNIs Core Flexibility Report
13. GNI update on Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) Recast
14. AOB Items/Next Meeting/Close of the CMF

1. Review of minutes from last meeting

- [Minutes](#) of CMF meeting of 16 October were issued on 31 October.

2. Review of Open Actions



2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C572	Transporter to monitor the ongoing basis the adequacy of the initial 25% Tolerance for RNG Entry Points	Transporter	27/03/2019	Ongoing
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/ CRU	25/03/2020	Ongoing
C587	Transporter to commence review of the Emergency Section of the code of Operations and provide an update at the next CMF	Transporter	18/10/2023	Ongoing

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C596	EAI to follow up with their members about the close out of outstanding OEM reports	EAI	04/09/2024	Completed
C597	GNI to consider sending out an automated email alert for gas quality changes	GNI	04/09/2024	Completed
C598	GNI's Future Networks team to attend the next CMF and give an update on engagement with EirGrid on dispatch signals	GNI	04/09/2024	Completed
C599	Transporter to engage with EAI on the impact of the Methane emissions Reduction Regulation on Generators	GNI	04/09/2024	Completed
C600	Transporter to provide an update on North South Flows	GNI	16/10/2024	Ongoing

3. Maintenance Days



3. 2024/2025 Maintenance Days

- GNI does not plan to undertake any maintenance activities during the gas year 2024/25 which will interfere with gas flows.
- All maintenance activities on GNI infrastructure/equipment relation to the Bellanaboy entry point will be co-ordinated with planned maintenance shutdowns by the Corrib operator.

4. 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 extended to 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	12/02/2024*	CRU Determination

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

5. 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](#).

The combined proposals outline how GNI and the SoLR will manage an event to take account of:

- New short-term capacity products in the DM/LDM market;
- Amended SoLR invoicing and Disbursement billing processes in the month of the SoLR event;
- Permit SoLR CoS/EUA at SoLR Affected DM & LDM Offtakes at the end of any month of the SoLR event; and
- Recent experience in NDM SoLR events.

Next Steps: GNI continues to engage with BGE on their SoLR comments around the Failed Supplier obligations, Entry arrangements, , “SoLR affected Shippers” and GNI reporting.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A112	Amendment to Supplier of Last Resort provisions	Industry Review	Discussions are ongoing with existing SOLR.	TBC	CRU Determination

6. Code Modification Proposal A113



Amendment to Code of Operations to amend gas
quality requirements at Entry Points

6. Code Modification Proposal A113 - Amending gas quality requirements at Entry Points



- The Health and Safety Executive (HSE) in the UK has recently approved changes to the Great Britain (GB) gas quality specification in the Gas Safety Management Regulations (GSMR). The relevant changes approved by HSE include the reduction in the lower WOBBE limit to 46.5 MJ/m³ and the replacement of the Incomplete Combustion Factor and Soot Index with the relevant density limit of ≤0.7. The replacement of ICF and SI with a RD limit has become effective in the UK as of 6 April 2023.
- GNI has reviewed the implications of the planned changes to the GSMR specification and concluded it would be best to realign the RoI gas quality specification in the Code with the new GSMR specification.
- The implementation of the lower WOBBE limit has been deferred until 6th April 2025 (to allow sufficient time for industry to prepare for the change).
- GNI published relevant [Supporting Documentation](#) on the 11th of August 2023.
- GNI have issued an end user Gas Quality Change Notification to all Shippers and have subsequently followed up with all Shippers in the NDM/DM market to ensure that they have issued the notice to their perspective end users.
- **Next Steps:** Currently in CRU Review Period.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A113	Amendment to Gas Quality Standards at Entry Points	CRU review	Extended hybrid review period has now ended	12/02/2024*	CRU Determination

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

7. Code Modification Proposal A115



Removal of Tolerances at RNG Entry Points

7. Code Modification Proposal A115 – Removal of Tolerances at RNG Entry Points

- The Proposal is to Remove Tolerances at RNG Entry Points .
- As outlined in the most recent ENTSOG [Implementation Monitoring Report](#), Ireland has not complied with the obligation in Article 45 of the Balancing Network Code to **discontinue the use of interim measures (which include balancing tolerances) within five years from the date of entry into force of the Code, i.e. 16 April 2019, due to the remaining outstanding tolerance at RNG Entry Points.**
- The rationale for retaining the RNG Entry Point tolerance was to support the development of renewable gas injection. On reviewing this relief, GNI is of the view that its retention is no longer justifiable as it does not provide any benefit to RNG producers and is of small benefit to Shippers granting them a more favorable cashout price.
- This is a matter of compliance and practical implementation is straight forward. Amending Part E (Balancing/Shrinkage) of the Code of Operations to remove tolerances from RNG Entry Points will ensure full compliance with the Balancing Network Code.
- GNI issued the [proposal](#) along with [supporting documentation](#) on the 31st of July.
- **Next Steps:** Industry Review elapsed on the 13th of November, we are now in CRU Review Period.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A115	Removal of Tolerances at RNG Entry Point	CRU Review Period	To allow the CRU to review the Code Modification Proposal Report	12/02/2024*	CRU Determination

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	12/02/2024*	CRU Determination
A112	Amendment to Supplier of Last Resort provisions	Industry Review	Discussions are ongoing with existing SOLR.	TBC	CMF Proposal Report to issue
A113	Amendment to Gas Quality Standards at Entry Points	CRU Review	Extended review period has now ended	12/02/2024*	CRU Determination
A115	Removal of Tolerances at RNG Entry Point	CRU Review	To allow the CRU to review the Code Modification Proposal Report	12/02/2024*	CRU Determination

9. Gas and Electricity interaction



Jason Herbert – Electricity Association of Ireland

10. Update on Mitchelstown CGI



Stephen O'Riordan – Wholesale Market Manager

Business Rules process

- The Central Grid Injection and RNG Entry Point draft Business Rules were issued for industry review on the **7th of August 2024**.
- GNI formally introduced the draft Business Rules at the Code Mod Forum, on the **4th of September 2024**.
- Industry review closed on the **13th of November 2024**, with three responses received.
- The draft Business Rules are now at CRU Review – **final Business Rules will be published following if / when approved by the CRU.**

Central Grid Injection and RNG
Entry Point draft Business Rules, to
inform prospective Modifications to
the Code of Operations

Purpose of the Business Rules and next steps

- The **draft Business Rules** have been developed to outline GNI's current view on how the Mitchelstown CGI Facility (and other similar facilities) will operate; many of the provisions outlined will also be applicable for other RNG Entry Points.
- The draft Business Rules are designed to enable industry to understand and comment on the provisions as they relate to the Code prior to the commencement of detailed Code drafting.
- This will be an **iterative process** and GNI cannot develop all relevant documentation in parallel without some level of agreement on the broad approach.
- **Code Modifications Proposals** will be advanced in line with the Business Rules if/ when approved by CRU and will include the proposed legal drafting amending the Code of Operations.
- For the avoidance of doubt, **Code Modification proposals including the detailed legal drafting will also be presented for industry review in due course** – other relevant documents will be presented as directed by CRU e.g. PSA / CSA etc.

Sections 1 through 4 of the draft Business Rules document are included to provide an overview of the CGI structure, and the general context to support discussion of the Business Rules. Sections 5 and 6 outline the Business Rules and Code Impacts and are designed to inform prospective Code Modifications.

11. Update on Biomethane for Shrinkage



Padraig Fleming – Biomethane Commercial Manager

11. Request for Information (“RFI”) & Market Engagement Summary

- On July 26th Gas Networks Ireland issued a PIN and RFI to commence pre-market engagement. The deadline for RFI submissions was Aug 28th.
- Gas Networks Ireland received a considerable number RFI submissions from a cross-section of potential AD developers, Suppliers, and Shippers.
- Gas Networks Ireland hosted a series of bilateral meetings with a cross-section of domestic and international AD developers, shippers / suppliers.
- GNI engaged with a cross-section of interested parties as part of the pre-market engagement stage for the procurement of biomethane for shrinkage.
- These discussions provided valuable insights into the market dynamics, the key contractual requirements, and potential challenges.
- Gas Networks Ireland is currently designing the Qualification System Questionnaire (“QSQ”).
- The next step in the process will be to issue the QSQ to potential participants for pre-qualification.

11. Procurement Process

Stage 1: Request for Information

Request for Information is the first stage of the process that involves gathering information about potential suppliers and their capabilities.

Stage 2: Pre-market Consultation

Pre-market consultation is the second stage of the process that involves discussing the procurement with potential suppliers to identify any issues or challenges and develop a better understanding of the supplier market.

Stage 3: Designing & Issuing the Qualification System Questionnaire (QSQ)

Designing & Issuing the Qualification System Questionnaire (QSQ) is the third stage of the process that involves evaluating potential suppliers based on their qualifications, experience and financial stability

Stage 4: Evaluating the QSQ

The QSQ evaluation stage involves assessing the quality of the supplier's proposal, capability, and capacity.

Stage 5: Issuing the Call for Competition (CFC)

The CFC stage involves issuing a tender pack to invite bids from qualified suppliers.

Stage 6: Contract Execution

The contract execution stage involves finalizing the agreement with the successful supplier, completing all documentation, and clearing any final obstacles

11. Next Steps for CMF

- GNI will continue to provide updates to the Code Mod Forum (and to CRU bilaterally) on the development of this proposal.
- The introduction of long terms contracts for biomethane to cover shrinkage requirement would necessitate changes to the Code of Operations which would need to be approved by CRU.
- The Code states that:
 - *“The Transporter shall purchase Shrinkage Gas (a “Shrinkage Gas Buy”) for delivery to the Transportation System on or after the Day commencing on 1 October 2020 and may dispose of Shrinkage Gas so purchased (a “Shrinkage Gas Sell”) for the purpose of this Code by posting and accepting bids on the Trading Platform or by such other commercial means and on such other terms as the Transporter thinks fit with the approval of the Commission...”*
- GNI expects relevant Code Modifications in the second half of 2025.

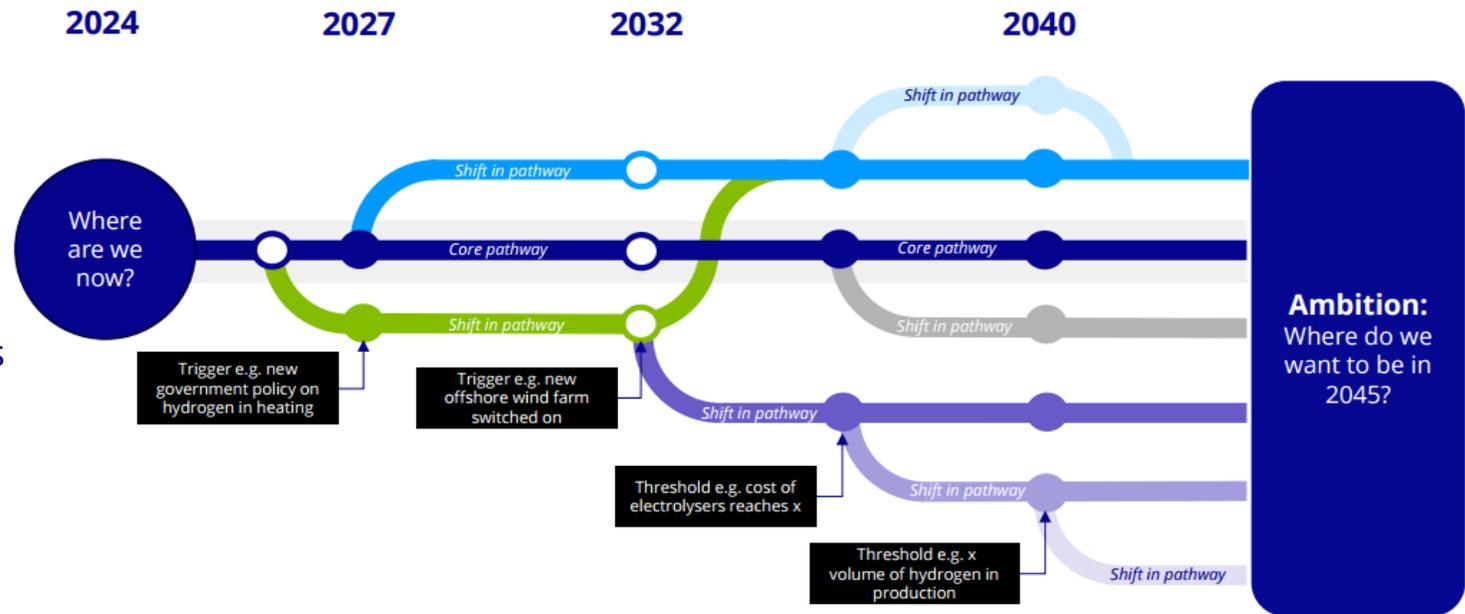
12. Presentation on GNIs Core Flexibility Report



Siobhan O'Halloran – Future Networks Manager

What is adaptive planning?

- **Adaptive Planning** is an iterative framework for decision-making in uncertainty.
 - Avoids commitment to one single long-term plan.
 - Allows for flexibility to switch between actions creating a strategy that can evolve over time.
- **Adaptive Pathways** are a specific adaptive planning approach to achieve the long-term strategy or goal.
 - Takes various forms, but typically based on a decision tree with thresholds and trigger points.
 - Each route in a decision tree forms an adaptive pathway that can be implemented as conditions evolve.
 - Relies on monitoring and evaluation of conditions and trigger points over time.
- **The aim** is more robust long-term planning with more focus on low regret investments.



What has been asked of GNI to deliver in an adaptive planning report?

Ambition

- The report is tied to a clear and unified underlying gas network strategy.

Scenario

- A clear list of assumptions (e.g. around energy policy and industry developments) and a set of well justified scenarios that underpin GNI's analysis.
- A range of policy and supply and demand scenarios for the gas network has been created.

Pathways

- A demonstration of low regrets investments for the gas network.
- A list of trigger and decision points that would cause GNI to change the central plan, along with proposed changes to the pathway.

Monitoring

- Defining milestones and metrics to monitor trigger points and evaluate GNI's adaptive planning performance.

Engagement

- GNI will consider whole system implications of the adaptive pathways, with meaningful stakeholder engagement.

Summary of Roadmap for Adaptive Pathways



2. Adaptive Planning Adoption

Start to build capability and embed adaptive planning processes to ultimately develop the first issue of the Adaptive Pathways report

OUTPUT: CORE FLEXIBILITY REPORT – First Issue

2025

3. Institutionalise Adaptive Planning Best Practice

Continue to embed adaptive planning processes across the organisation, seeking a consistent application of the processes. Align Adaptive Pathways with next iteration of Network Development Plan (2026).

OUTPUT: SUPPLEMENTAL FLEXIBILITY REPORT

2026

Immediate

1. Adaptive Planning Foundations

Develop adaptive planning processes, building upon current GNI practice, and achieve buy-in from CRU & GNI Leadership on the approach to develop the first Adaptive Pathways Report.

OUTPUT: CORE FLEXIBILITY REPORT - Outline Plan

4. Drive Value & Sector Coupling

Work to align with EirGrid TES, particularly expanding the ambition & scope from the first issue of the report with full suite of scenarios & pathways for Future State.

OUTPUT: CORE FLEXIBILITY REPORT - Second Issue

2027

5. Future Horizons

Seek opportunities to increase the maturity of the adaptive planning process across GNI, for example moving into a position of agile responses to external triggers & the application of market context in decision making processes .

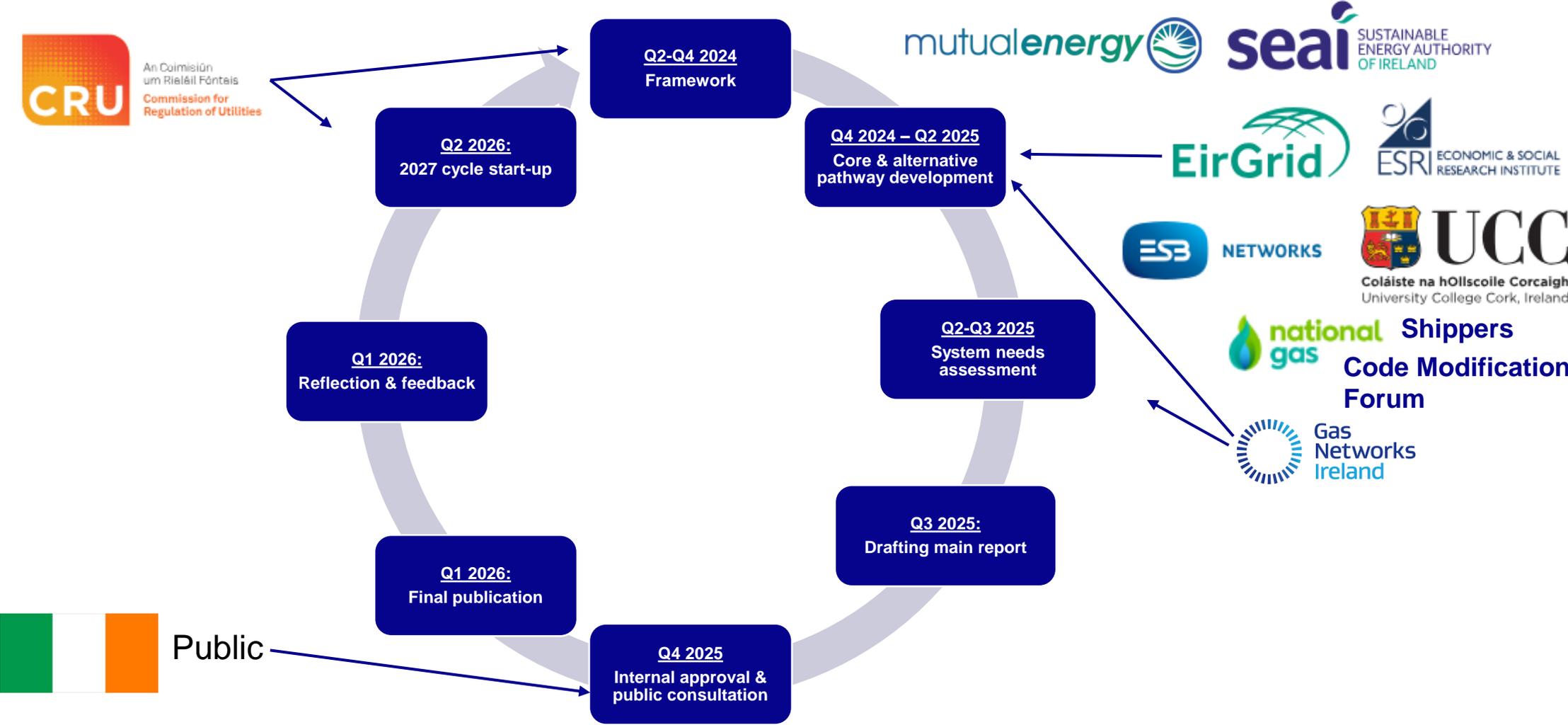
OUTPUT: CORE FLEXIBILITY REPORT - Developing Maturity & Complexity

2027+

High level timeline for first iteration

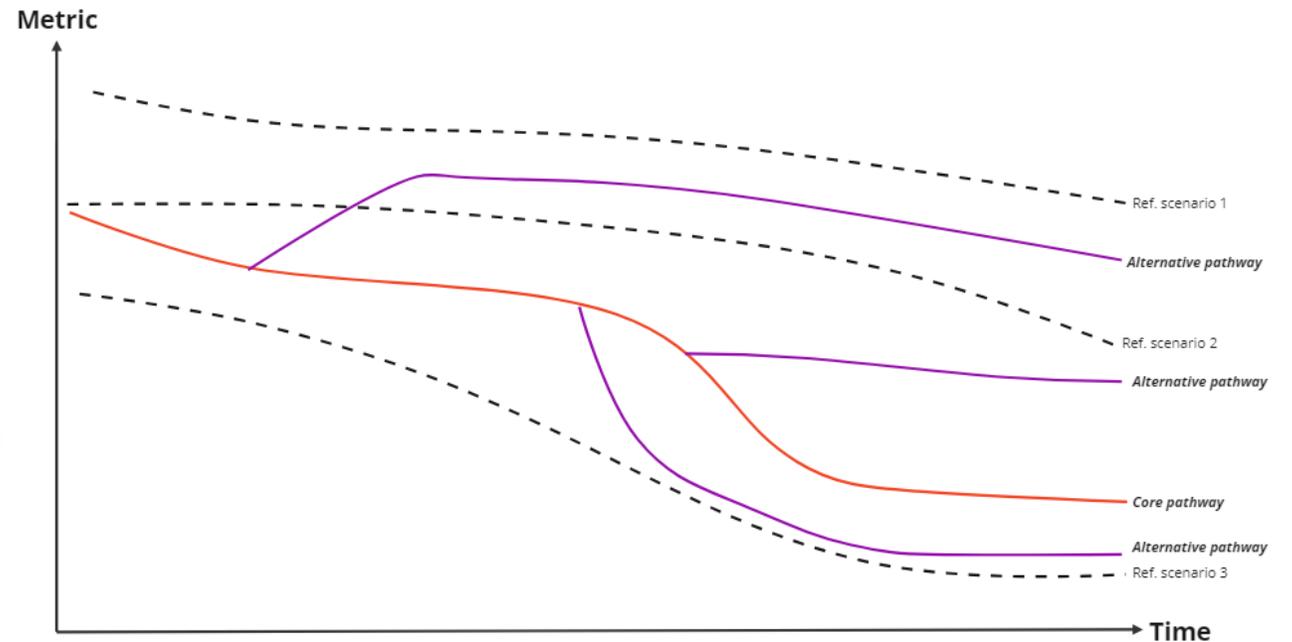


High level timeline for first iteration



GNI Phase 1 approach for Adaptive Planning

- Core pathway will be linked to GNI strategy
- Trigger points to identify alternative pathways off core pathway
- E.g. no hydrogen storage, less offshore development, network decommissioning/repurposing or less biomethane support
- 2-4 reference scenarios (based off EirGrid TES 2023) used to compare results of core & alternative pathway.
- Metrics to be set to monitor and evaluate performance of trigger point and pathways



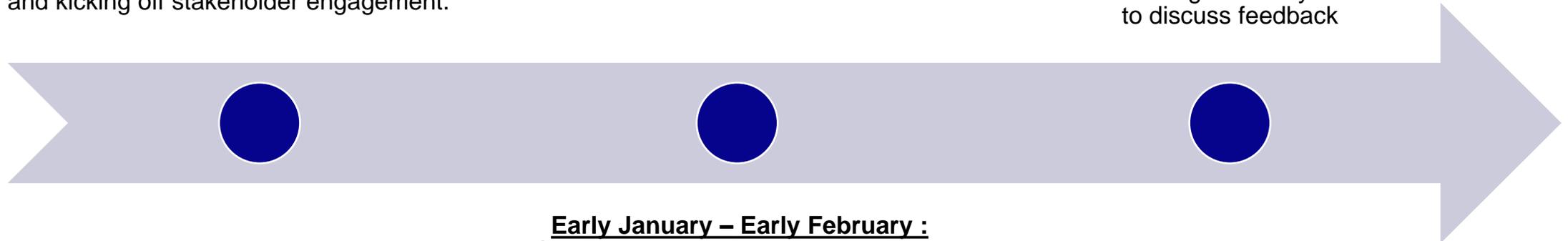
What to expect in the coming months?

December – early January:

Webinar on GNI's plans to deliver adaptive planning and kicking off stakeholder engagement.

Mid January – Early February:

Individual meetings with key stakeholders to discuss feedback



Early January – Early February :
Sending out questionnaires on trigger points and modelling input parameters.



Thank you for your attention!

13. GNI update Regulation on Wholesale Energy Market Integrity and Transparency (REMIT) Recast



Ryan O'Connell- Market Development Analyst

- REMIT is the EU framework that aims to prevent wholesale energy market abuse and support fair competition. Since 2015, all participants trading wholesale gas or electricity contracts for delivery in Europe on Organised Market Places (OMPs) have the obligation to report information about their trading activity to ACER.
- The REMIT regulation was recently revised to ensure the regulatory framework keeps pace with evolving market dynamics.
- [Regulation 2024/1106](#) entered into force on 8 May 2024.
- As part of this revision, the European Commission is mandated to revise the REMIT Implementing Regulation by 8 May 2025.
- This update is aimed at defining new rules and requirements for data reporting under REMIT.

Related Consultations:

- Proposed revisions to the Annex of the REMIT Implementing Regulation
- Consultation on ACER Fees
- Survey of Article 15 (a)

Key findings from the Proposed revisions to the Annex of the REMIT Implementing Regulation consultation:

- Stressed the need for maintaining a stable and well-functioning data reporting framework.
- Provided detailed feedback on different sections of the Annex, questioning the feasibility and necessity of the proposed changes.
- Emphasised the importance of allowing sufficient time to implement new reporting requirements.

What are the next steps?

- The outcomes of ACER public consultation and roundtable meetings will contribute to the ongoing discussion with the European Commission on the revision of the REMIT Implementing Regulation.
- The Commission will then amend the Implementing Regulation to define the new data reporting requirements by 8 May 2025.
- ACER will continue to provide timely updates and guidance notes.
- Gas Networks Ireland will continue to engage with ENTSOG and ACER to seek clarity on any regulatory changes.
- Further updates to the TRUM and other guidance documents are required to provide clarity to the market.

14. AOB Items/End of Year Review/Next Meeting



Gas
Networks
Ireland

- The introduction of a CMF end of year report was an improvement activity agreed in early 2023.
- The end of year report fulfils several existing requirements in one place and covers the following;
 - Lists of completed Code Modifications in the year and link to latest published version of the Code
 - List of Work-in-progress Code Modifications and status update
 - List of prospective Code modifications for the coming year
 - List of Code Mod Forum dates and locations for the coming year
- With respect to prospective Code Modifications for the coming year, we propose to finalise these (and the 2025 calendar) via an ad-hoc meeting on the 29th of January 2025. **GNI request written comments by the 24th of January 2025.**

1. Biomethane Developments:

- A Proposal to facilitate the use of a Central Grid Injection (CGI) Point. GNI have developed and circulated [Central Grid Injection and RNG Entry Point Business Rules to inform prospective Modifications to the Code of Operations](#). It is expected that proposal(s) will issue in the first half of 2025, and the proposal(s) will be subject to full Industry / CRU review.
- A Proposal to facilitate the procurement of biomethane by GNI for Shrinkage Gas. GNI has developed a proposal to allow it to procure biomethane for part of its Shrinkage Gas requirements. It is projected to issue in the second half of 2025.

2. SPC Developments:

- A Proposal to specify a Supply Point Capacity (SPC) setting process for CNG offtakes. A pre-existing A099 Proposal is in abeyance. This matter remains in development. GNI will, in the first half of 2025, either progress this or an analogous Proposal or formally withdraw the existing A099 Proposal.
- A Proposal resulting from the SPC setting review. There is an ongoing SPC (other than CNG offtakes) setting review. GNI's internal review is at an advanced stage and if a Proposal is developed it is expected to issue in the first half of 2025.

14. Next Meeting

- The next Meeting is an ad-hoc meeting scheduled for the 29th of January to discuss the arrangements outlined in the End of Year Report.
- The next CMF is proposed to take place on the 12th of February.

14. Prospective Code Modification Forum Meetings in 2025

Next CMF Meeting



CMF Dates	Location
12 February	Virtual
2 April	Hybrid (Dublin)
18 June	Hybrid (Dublin)
3 September	Virtual
15 October	Hybrid (Dublin)
3 December	Virtual

**Thank you for your
participation**



**Gas
Networks
Ireland**