

# Code Modification Forum

## Wednesday, 11th of February, 2026

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 A116 - Removal of Commissioning Tolerances and Tolerances associated with Plant Trips</i>	5	10:50 - 10:55
6.	<i>Code Modification Proposal A117 - Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements</i>	5	10:55 - 11:00
7.	<i>Code Modification Proposal A118 - Central Grid Injection and RNG Entry Point arrangements</i>	90	11:00 - 12:30
8.	<i>Status of Code Modification Proposals</i>	5	12:30 - 12:35
9.	<i>GNI Shipper Survey Results and Action Plan</i>	5	12:35 - 12:40
10.	<i>AOB Items / Next Meeting / Close of the CMF</i>	5	12:40 - 12:45

## Microsoft Teams meeting

**Join:**

<https://teams.microsoft.com/meet/3110077576936?p=wczAQB1gNZFbD0GKC>

f

Meeting ID: 311 007 757 693 6

Passcode: Bq6YX3YV



Gas  
Networks  
Ireland

# Code Modification Forum – Virtual Meeting

Wednesday, 11<sup>th</sup> of February

# 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 A116 - Removal of Commissioning Tolerances and Tolerances associated with Plant TripsStatus of Code Modification Proposals
6. Code Modification Proposal A117 - Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements
7. Code Modification Proposal A118 - Central Grid Injection and RNG Entry Point arrangements
8. Status of Code Modification Proposals
9. GNI Shipper Survey Results and Action Plan
10. GNI AOB Items / Next Meeting / Close of the CMF

# 1. Review of minutes from last meeting

---

- [Draft CMF Minutes](#) from the 3<sup>rd</sup> of December, were issued on the 16<sup>th</sup> of December.



Gas  
Networks  
Ireland

Moving Ireland's Energy

## 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
C609	Transporter to review the rules related to online meeting recordings	Transporter	21/01/2026	Ongoing



Gas  
Networks  
Ireland

Moving Ireland's Energy

# 3. Maintenance Days

Kevin O'Keefe – Southern Regional Operations Manager

### 3. 2025/2026 Maintenance Days

- Project works will continue in Beattock & Brighthouse and at a number of Above Ground Installations (AGIs) throughout 2026 however we do not foresee any disruption to flows at exit points.
- 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.
  - In 2026 GNI will be conducting an in-line inspection (ILI) of Pipeline to the West which may result in the reduction of Bellanaboy flows for the dates listed below to facilitate the ILI inspection;
  - Baldrumman to Ories: 30<sup>th</sup> March, 2<sup>nd</sup> April, & 7<sup>th</sup> April
  - Ories to Cappagh South: 5<sup>th</sup>, 6<sup>th</sup> & 8<sup>th</sup> May
- GNI will make every effort to minimise disruption of gas flows from Bellanaboy during these inspections





Gas  
Networks  
Ireland

Moving Ireland's Energy

# 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 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	22/04/2026*	CRU Determination

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



Moving Ireland's Energy

# 5. Code Modification Proposal A116

Removal of Commissioning Tolerances and Tolerances associated with  
Plant Trips

## 5. Code Modification Proposal A116 - Removal of Commissioning 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:** The Instruction and associated Rationale for Code Modification Proposal A116 issued on 23 December 2025.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A116	Removal of Commissioning Tolerances and Tolerances associated with Plant Trips	Instruction and Rationale issued	NA	NA	NA



Moving Ireland's Energy

# 6. Code Modification Proposal A117

Modification to the Code of Operations Supplier of Last Resort (SoLR)  
arrangements

## 6. Code Modification Proposal A117 - Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements

Issued and circulated on 19 August 2025

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

- Code Modification proposal A117
- Code of Operations Part F
- Comparison version Code of Operations Part F
- Memorandum of Explanation - Code Mod SoLR Proposal
- Supplier of Last Resort Procedures September 2025

### Update:

- The Industry Review period for this proposal ended on the 12<sup>th</sup> of November with the Transporter receiving no submissions from industry. GNI are seeking engagement with CRU retail to progress the Code Mod and SoLR Procedure to approval.

### Next Steps:

- The Transporter is to engage with CRU Retail and to furnish the Code Modification proposal report to the Regulator.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A117	Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements	Code Modification Proposal Report to issue	To formally present the findings of the Industry Review period.	NA	CRU Review



Moving Ireland's Energy

# 7. Code Modification Proposal A118

Central Grid Injection and RNG Entry Point arrangements

## 7. Code Modification Proposal A118 – Central Grid Injection and RNG Entry Point arrangements



- [Code Modification Proposal A118 – Central Grid Injection and RNG Entry Point arrangements](#) was issued on 26 January 2026
- Documents issued with Code Modification Proposal can be found [here](#) and include the following:
  - Code Modification Proposal A118
  - Code Modification Proposal Explanatory Memorandum
  - Central Grid Injection and RNG Entry Point Arrangements – Business Rules
  - Proposed Modified Code of Operations Text, Parts A, C, D, E, F, G, H, and I

### Update:

- GNI proposes a **six-week industry review period** for this Code Modification Proposal, which will run until **25 March**.
- GNI proposes to hold an **Industry Workshop / Q&A session on Wednesday 11 March** – GNI request written questions by **Wednesday 04 March**.

**Next Step:** Industry Review Period to be agreed.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A118	Central Grid Injection and RNG Entry Point arrangements	Industry review	To allow Industry to formally review the Proposal	25/02/2026*	Code Modification Proposal Report to issue

\*Provisional status end date for the Industry Review Period, to be reviewed at the CMF

# A118 Code Mod Proposals and Business Rules

This Proposal seeks to update the Code of Operations to enable the introduction and operation of Central Grid Injection (CGI) Facilities, to achieve a level of consistency with the treatment of RNG Entry Points. As part of the proposals, GNI issued the following documents:

Code of Operations Modification Proposal

Code Modification Proposal Explanatory  
Memorandum

Proposed Modified Code of Operations text,  
Parts A, C, D, E, F, G, H and I



The Business Rules have been developed to outline GNI's proposals on how the Mitchelstown CGI Facility (and other similar facilities) will operate to the extent that the Modifications to the Code, proposed under Code Modification Proposal A118, can be understood by relevant stakeholders in the context of the overall proposals. Many of the provisions outlined in this document which will apply to CGI Gas Points within a CGI Entry Point will also be applicable at other RNG Entry Points.



The Business Rules are provided as a guide to the associated Proposed Modified Code of Operations text, and should be read alongside the other constituent documents of the A118 Proposal. The Business Rules exist for the sole purpose of guiding this Code Modification Proposal and has no binding effect.

# General Principles for CGI Business Rules & Code Modifications

P1

**Simplicity:** the objective will be to introduce straightforward rules without any unnecessary complexity which will be applied to both CGI Gas Points within a CGI Entry Point, and RNG Entry Points to provide clarity for RNG Producers and Shippers.

P2

**Consistency:** All CGI Gas Points within a CGI Entry Point, and RNG Entry Points and will be subject to similar provisions with respect to the Code, with consistent rules applied regarding Shipper arrangements.

P3

**Alignment:** Align with the current provisions and principles established in the Code of Operations and minimise the required changes to the Code.

P4

**Non-discrimination:** GNI as the Transporter has an obligation of non-discrimination and avoidance of anti-competitive behaviour and this is reflected in these draft Business Rules.

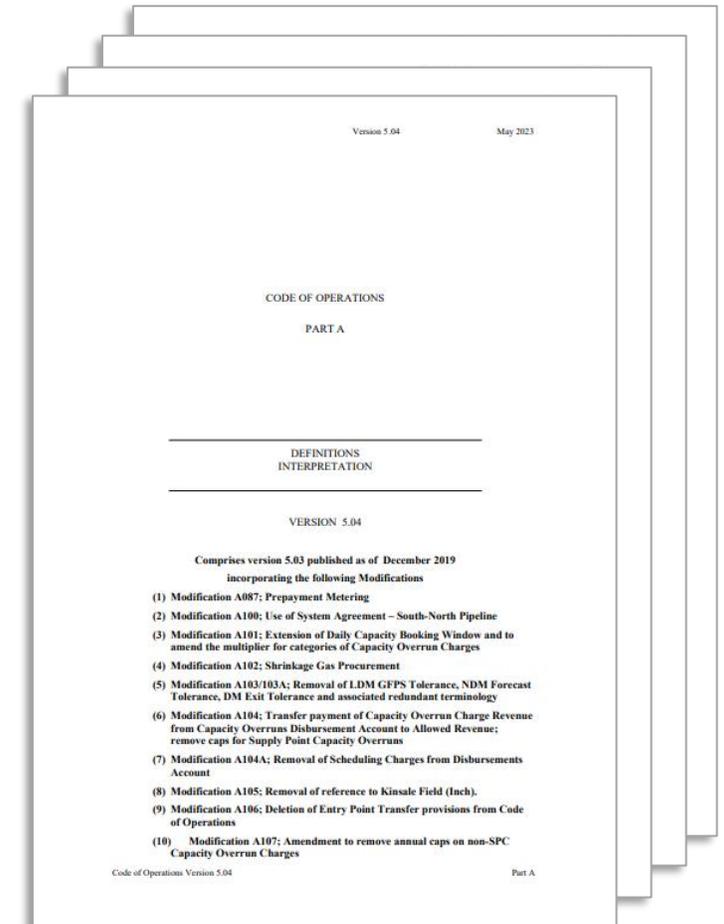
P5

**Accessible:** It is envisaged that the Business Rules presented here would be consistently applied to all similar CGI Facilities to the extent possible.



# Key concepts to be incorporated into the Code of Operations

- As per the Code, only licensed gas shippers which have entered into a Framework Agreement with the Transporter such that they are bound by the terms of the Code of Operations, may tender gas for delivery to the Transportations system – **RNG producers will thus have to secure the services of a gas shipper.**
- The CGI Entry Point will be configured as a series of **CGI Gas Points** with each producer assigned its own specific CGI Gas Point.
- CGI Gas Points will be configured as set out in the **relevant CSA** as is currently specified in the Code.
- Only **one shipper** will be registered at each CGI Gas Point at a given time – it is proposed that this provision will be extended to all RNG Entry Points under the Code.
- Producers will be allowed to change their shipper at the start of each month, if they so choose, by way of a **capacity assignment procedure.**
- A shipper at a CGI gas point will **book capacity** in accordance with the Part C of the Code to allow the shipper deliver gas to the Transportation System.
- **Nominations and allocations** will be as prescribed in the Code currently and we propose minor changes only – there will be a single prevailing nomination / allocation for each of CGI Gas Point or RNG Entry Point.



## Connected System Agreement (Statement of terms)

<p><b>Parties to the agreement</b></p>	<p>In the context of the Mitchelstown CGI Facility, as GNI will be acting in both the role of the Transporter and CGI Administrator – CGI Statement of Terms will be published in place of a CSA.</p> <p>It is in the interest of all stakeholders that the rules governing the interaction between the Transporter and CGI Administrator are clearly and transparently set out.</p>
<p><b>Scope</b></p>	<p>The Statement of Terms will set out how GNI as Transporter, and GNI as CGI Administrator will interact such that entry of gas at the physical CGI Entry Point / applicable CGI Gas Points is managed in accordance with all necessary standards and the Code.</p>
<p><b>Key Components</b></p>	<p>The CSA will cover the configuration of CGI Gas Points, metering arrangements, gas quality checks, technical / safety standards, odorant injection and the remote operating valve.</p>

## Producer Services Agreement

<p><b>Parties to the agreement</b></p>	<p>The PSA governs the relationship between each RNG Producer seeking to utilise the CGI Facility, and GNI in its role as CGI Facility Administrator.</p>
<p><b>Scope</b></p>	<p>The purpose of the PSA is to ensure that all obligations and rights with respect to accessing the CGI Facility are described appropriately and to ensure that all operational arrangements align with the terms of the code and that Local Operating Procedures are adhered to</p>
<p><b>Key Components</b></p>	<p>Under the terms of the PSA, the Producer will receive a right to decant a fixed volume of gas – decanting quantity.</p> <p>The PSA will also cover operational arrangements including assignment of decanting slots, access to the site, verification of personnel, verification of trailers, onsite directions and safety and operation procedures.</p>

# CGI setup – worked example



**GNI as the Transporter and GNI as the CGI Facility Administrator will establish a CSA** – this will establish among other things the process for configuration of the new CGI Gas Points.



**Producers will enter into a PSA agreement** with GNI as the CGI Facility Administrator – this will specify CGI decanting capacity, related standard contribution charges, procedures for producer registration / configuration, decanting schedules, site access and Local Operating Procedures.



**Each producer will have its own CGI Gas Point** – GNI acting as the Transporter will configure CGI Gas Point on the Transportation System – the Capacity Limit of the CGI Gas Point will be based on the stated Decanting Quantity in the PSA.



**Producers will need to contract with a gas shipper** – only licensed gas shippers which have entered into a Framework Agreement with the Transporter and thus bound by the Code, may tender gas for delivery to the Transportation System.



**A Shipper must submit a request to be a registered Shipper at a CGI Gas Point** – Shippers will be required to hold sufficient capacity for each CGI Gas Point in order to deliver gas to the Transportation System.



**A Shipper will cease to be the Registered Shipper at a CGI Gas Point** upon the expiry of its capacity booking, or from the Day on which another Shipper becomes the Registered Shipper at that CGI Gas Point as a result of a capacity assignment.

# Day to Day Shipper Arrangements at CGI



## Capacity Bookings

A Shipper will become a Registered Shipper at a CGI Gas Point on the first day of the Entry Capacity Booking Period of such Shipper's Entry Capacity Booking, which in the case of a CGI Gas Point will be the first day of a month.

The Shipper will remain the Shipper at a CGI Gas Point until such time as their capacity booking expires, or is assigned to another Shipper in line with Part I of the Code. The same provisions will be extended to RNG Entry Points.

## Nominations

The Registered Shipper at each separate CGI Gas Point within a CGI Entry Point will be required to nominate at each individual CGI Gas Point. There will be a single prevailing nomination per day.

There will be no concept of aggregate nominations, even if a Shipper is the Registered Shipper at multiple CGI Gas Points at the same CGI Entry Point.

In the absence of a nomination, or if a nomination of zero is submitted, any gas that does flow at a CGI Gas Point will be allocated to the Registered Shipper. The same provisions will be extended to RNG Entry Points.

## Allocations

Allocations will be specific to each separate CGI Gas Point within a CGI Entry Point or RNG Entry Point, even in the case where a Shipper is the Registered Shipper at a number of CGI Gas Points at the same CGI Entry Point.

CGI Metering will determine the quantity of gas deemed delivered to the Transportation System at a CGI Gas Point. All such gas will be allocated to the Shipper registered at that CGI Gas Point whether the Shipper has submitted a nomination or not.

At month end, meter data cleansing may be completed, and if there are errors, an adjustment will be made in order to correct these. The same provisions will be extended to RNG Entry Points.

# Code of Operations – overview of Code Modification proposals



<b>Part A – Definitions and Interpretation:</b>	Further definitions will need to be added to Part A for a Central Grid Injection Facility (CGI) and for the CGI Gas Points which will make up the CGI. Definitions will not be specific to any one facility and common rules will be applied to all CGI Entry Points including CGI Gas Points throughout the Code.
<b>Part B – General Principles:</b>	No Changes Proposed to Part B.
<b>Part C – Capacity:</b>	Updates to Part C will include changes to Sections 3 to extend capacity booking provisions to CGI Gas Points and CGI Entry Points, introduce new requirements for notifications and confirmations, and allow Transporter rejection under specified conditions. Additional references to CGI Gas Points will be added throughout for clarity, and Section 4 (Entry Capacity trades) will be disapplied for CGI Gas Points and RNG Entry Points to maintain the one Shipper per Producer rule.
<b>Part D – Nominations, Allocations and NDM Supply Point Reconciliation:</b>	Part D will see minimal changes, primarily adding references to CGI Gas Points for clarity. New provisions will be inserted into Section 1.1.7 to ensure only one prevailing Entry Nomination per Day at each CGI Gas Point Section 2.5.1 will be updated to allocate all gas to the single Registered Shipper.
<b>Part E – Balancing and Shrinkage:</b>	No substantial changes envisaged; appropriate references to CGI Gas Points included where required.

## **Part F – Administration**

Part F will be updated to reflect the one Shipper per CGI Gas Point and RNG Entry Point rule. Section 1.2 will be revised to include these provisions, and Section 1.3 will be updated to address Shipper registration at CGI Gas Points, including changes to 1.3.2 and 1.3.3 for registration via capacity booking and configuration timing. Section 3A will be introduced to address configuration of CGI Gas Points.

## **Part G – Technical:**

Part G will be updated to refer to CGI Gas Points where required. A new rule will be added to Section 1.3.4 stating that once gas is metered and accepted at a CGI or RNG Entry Point, the Allocable Quantity is final and won't change. Section 3.3 will be updated to cover measurement at CGIs, including provisions with respect to missing meter readings. Section 4.5.1 will also be revised to allow the use of check-meter data at RNG or CGI Entry Points to provide evidence as to when equipment went out of range.

## **Part H – Operations:**

Part H will be updated mainly to add references to CGI Gas Points for clarity. A new section after 3.2 will address unique CGI entry requirements; and Section 3.6 will include a provision for publishing a CGI Statement of Terms where GNI acts as Connected System Operator.

## **Part I - legal and General**

Part I will be updated to facilitate the one Shipper per Producer rule through assignment provisions in Section 12.5. New clauses in 12.5.2(b)–(e) will require full capacity transfers at CGI Gas Points, joint applications by incoming / outgoing Shippers, and allow the Transporter to reject incomplete or non-compliant requests.



Gas  
Networks  
Ireland

## Overview of Key Concepts;



# What is a CGI in the context of the Code of Operations?

## Definition of Central Grid Injection (CGI)

- A CGI will be defined as a facility forming part of the Transportation System at which Shippers' RNG may be tendered for delivery to the Transportation System at individual CGI Gas Points and which facility provides CGI Metering.
- A definition of CGI will be added to the Code of Operations – A CGI Facility is distinguished from a (Directly Connected) RNG Entry Point, which is a facility which constitutes a single RNG Entry Point (as opposed to multiple CGI Gas Points), for the use of a single Producer only. The Direct Connection may be connected to the production site by a physical pipeline, or delivered to an injection facility by road transport.
- A facility which is defined as a CGI will have additional requirements in terms of the data it provides to the Transporter to allow for accurate allocations among the Shippers registered at each of the CGI Gas Points at the facility.

## Why does this make sense?

- By configuring a separate CGI Entry Point for each Producer, we can apply common rules for all CGI Entry Points, providing operational simplicity and demonstrating a non-discriminatory approach.
- All RNG Entry Points and CGI Gas Points within a CGI Entry Point will be subject to the same provisions with respect to the Code, with consistent rules applied regarding Shipper arrangements.

### **Code of Operations impacts and analysis:**

Further definitions will need to be added to Part A for a **Central Grid Injection Facility (CGI)** and for the **CGI Gas Points** which will make up the CGI. Definitions will not be specific to any one facility and common rules will be applied.

# Are other definitions changing in the Code of Operations?

## Changes to other definitions under the Code:

- Several existing definitions will need to change in the Code of Operations which are relevant to CGI Facilities and also RNG Entry Points.
- In particular the definition of RNG Delivery Facility is amended as follows;
  - **"RNG Delivery Facility"** means the plant and equipment constructed and/or installed immediately upstream of the Transportation System where quality parameters ~~are~~ **may be** measured and controlled and from which Renewable Natural Gas which meets the Entry Specification may be delivered via a single pipeline to the Transportation System.
- The definition of **"Connected System Agreement"** is amended to allow for the CGI Statement of Terms; and **"Connected System Operator"** is amended to refer to the role of a CGI Facility Administrator.

## Why does this make sense?

- The definition of "RNG Delivery Facility" now allows for different regulatory models to coexist, and allows for the maximum connection model in line with the PC5 decision.
- The definitions of "Connected System Agreement" and "Connected System Operator" take account of the contractual model for CGIs.

### Code of Operations impacts and analysis:

Existing definitions will need to be amended in Part A for **RNG Delivery Facility, Connected System Agreement** and for the **Connected System Operator**. Definitions will not be specific to any one facility and common rules will be applied.

# How will CGI Gas Points be set up at the CGI?

## Configuration of CGI Gas Points

- A CGI Gas point means a notional point at a CGI Entry Point established by the Transporter in accordance with Part F (Administration) Section 3A.1.1 of the Code.
- CGI Gas Points will be configured at a CGI Entry Point with a Capacity Limit equal to the Decanting Quantity described in the relevant PSA – the CSA will set out the procedure for configuring each CGI Gas Point at the CGI Entry Point.
- CGI Gas Points are contractual Entry Points at a CGI Entry Point, a single RNG Producer will be identified with respect to each CGI Gas Point. The physical location may not always be the same, i.e. a RNG Producer could use any of the decanting bays at the CGI Facility depending on availability and scheduling of decanting slots, and several RNG Producers could use the same decanting bay on a day.
- In general, provisions which relate to CGI Gas Points will be extended to RNG Entry Points as appropriate.

## Why does this make sense?

- Requires minimum changes to the Code of Operations as the section on configuration of Entry Points refers to the CSA as it is.

### **Code of Operations impacts and analysis:**

**Part F**, Section 1.3.4 of the Code of Operations already establishes the procedure for configuring Entry Points onto the Transportation System and refers to the configuration of Connected Systems. The Connected Systems Agreement for the CGI will be thus leveraged to specify the arrangements for configuring CGI Gas Points, as arrangements may vary from CGI to CGI depending on onsite arrangements etc.

# What are the arrangements for shippers at CGI Gas Points?

## Producer / Shipper Arrangements at CGI Entry Points:

- The RNG producer at the CGI will still need to secure the services of a gas Shipper, unless they themselves are a licensed gas shipper who has entered into a Framework Agreement with GNI the Transporter and is thus bound by the Code of Operations.
- On a day, only a single Shipper can be registered at a given CGI Gas Point, i.e. a Producer can only have one shipper at a time. A Shipper can have multiple RNG Producers active at a CGI Facility, i.e. they may be the registered Shipper at one or more CGI Gas Points at a CGI Entry Point.
- In order to become the Registered Shipper at a CGI Gas Point, a Shipper must book capacity at that point.
- For the avoidance of doubt the requirement that a single shipper can only be registered, will apply at RNG Entry Points.

## Why does this make sense?

- Provides straight forward rules for all CGI Entry Points and brings order to the gas market that will be populated by many new gas producers.
- Ensures that GNI can accurately allocate gas among shippers and avoids complexity with respect to allocation rules and resultant queries / disputes.
- Cost efficient and easy implementation, leading to opex savings vs. multiple shippers at each CGI Entry Point.

### **Code of Operations impacts and analysis:**

**Part F**, of the Code of Operations Code currently establishes the circumstances in which a Shipper can apply to become a registered Shipper and details rules around the number of Registered Shippers allowed at an Offtake Point. It is proposed that Section 1.2 of Part F will be updated to account for the provisions in relation to one Shipper at a CGI Gas Point within a CGI Entry Point or RNG Entry Point.

# How will metering work at a CGI?

## Metering at CGI Entry Points

- Each Decanting Stanchion / PRS at the Mitchelstown CGI will have its own physical fiscal meter – additionally, Gas Quality will be monitored continuously at the Decanting Stanchion / PRS for allocations / billing purposes.
- CGI Metering will apply at each respective CGI Gas Point, whereby an electronic register picks up the opening and closing reads of the relevant physical meter (hourly reads will be available throughout the decanting process).
- The term CGI Metering will be defined in the Code of Operations and relevant provisions around this described as required.
- There will be a meter in the BNEF which will be used as a check sum for meter data cleansing and other operational reasons.

## Why does this make sense?

- Each Producer will have its own CGI Gas Point, and they could use a different decanting stations from one day to the next depending on the decanting station schedules.

### **Code of Operations impacts and analysis:**

New definitions will need to be added to Part A of the Code to refer to CGI Metering, and the CSA / Statement of Terms will refer to metering arrangements. A new provision will be added to Part G Section 1.3.4 to confirm that once gas is metered and accepted at a CGI or RNG Entry Point, the Allocable Quantity will not change. Section 3.3 will be updated to cover measurement at CGIs, including provisions with respect to missing meter readings. Section 4.5.1 will also be revised to allow the use of check-meter data at RNG or CGI Entry Points to provide evidence as to when equipment went out of range.

# How will capacity be booked?

## Capacity:

- By signing the PSA, the RNG Producer is in effect contracting for the right to decant subject to meeting its obligations under the PSA. The Capacity Limit of the CGI Gas Point (under the code) will be set by reference to the decanting quantity (as set out in the relevant PSA) as notified by the CGI Facility Administrator to the Transporter under the CSA / Statement of Terms.
- Provisions related to CGI Gas Point Capacity will be broadly similar to existing provisions for booking Entry Capacity as outlined in Part C, Section 3 of the Code of Operations.
- Gas Shippers will be required to reserve capacity at a CGI Gas Point within a CGI Entry Point in order to have the right to make Entry Nominations and deliver renewable gas to the Transportation System.
- If a Shipper registered at a CGI Gas Point (or RNG Entry Point) has not procured sufficient capacity to cover the allocated flows, the usual overrun rules and the corresponding overrun charges will apply.

## Why does this make sense?

- Provides simple and straightforward rules for capacity booking and leverages existing provisions within the Code.

### **Code of Operations impacts and analysis:**

Provisions related to booking capacity at CGI Gas Points will be similar to existing provisions for booking Entry Capacity as outlined in Part C, Section 3 of the Code. A Shipper at a CGI Gas Point within a CGI Entry Point will book capacity in accordance with Part C of the Code to allow the Shipper to deliver gas to the Transportation System.

# How will nominations and allocations work?

## Nominations and allocations:

- There will be a single prevailing nomination per day at each CGI Gas Point (or RNG Entry Point). There will be no concept of aggregate nominations, even if a Shipper is the registered Shipper at multiple CGI Gas Points at the same CGI Facility.
- The nominated quantities submitted can be injected at any time of the relevant gas day, while respecting decanting schedules specified in the PSA.
- Entry Scheduling Charges will apply where Entry Nominations differ from the Entry Allocations outside of allowed tolerances as set out in Part E, Section 1.10 of the Code of Operations.
- Allocations will be specific to each separate CGI Gas Point within a CGI Entry Point (or RNG Entry Point), even in the case where a Shipper is the registered Shipper at a number of CGI Gas Points at the same CGI Entry Point in line with Part D, Section 2.2.2.

## Why does this make sense?

- This is entirely consistent with the current practice and adheres to principle no. 3 Alignment

### **Code of Operations impacts and analysis:**

**Part D** of the Code requires minimal intervention as GNI is not proposing any substantial changes. However, references to CGI Gas Points are proposed to be included where required, to provide clarity and completeness such that it is clear that references to Entry Points also apply to CGI Gas Points where appropriate. New provisions will be inserted into Section 1.1.7 to ensure only one prevailing Entry Nomination per Day at each CGI Gas Point. Section 2.5.1 will be updated to allocate all gas to the single Registered Shipper.



Gas  
Networks  
Ireland

Moving Ireland's Energy

# 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	22/04/2026*	CRU Determination
A116	Removal of Commissioning Tolerances and Tolerances associated with Plant Trips	Instruction & Rationale Issued	NA	NA	NA
A117	Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements	Code Modification Proposal Report to issue	To formally present the findings of the Industry Review period	NA	CRU Review
A118	Central Grid Injection and RNG Entry Point arrangements	Industry review	To allow Industry to formally review the Proposal	25/02/2026**	Code Modification Proposal Report to issue

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

\*\*Provisional status end date for the Industry Review Period, to be reviewed at the CMF



Gas  
Networks  
Ireland

Moving Ireland's Energy

# 9. GNI Shipper Survey Results and Action Plan

Colm Ó Duibhir – Regulatory Operations Manager

# Overview of Survey and Participants

Shippers and Suppliers were invited to take part in a one-to-one Teams discussion with W5, up to an hour in duration.

The following themes were discussed:

1. Overall satisfaction, and relationship with GNI in 2025
2. Perceptions of GNI with respect to:
  - Day to day operations
  - Biomethane/ renewable gases
  - Market entry process
  - Overall engagement / collaboration
  - PAYG project
  - 2026 & future challenges
3. Potential actions for Gas Networks Ireland going forward.

## 2025 Review

31 Individuals  
25 interviews

7/7 Active Suppliers  
15/17 Active Shippers (by  
corporate group)

All Shippers invited to  
participate.

# One word that sums up the relationship with Gas Networks Ireland



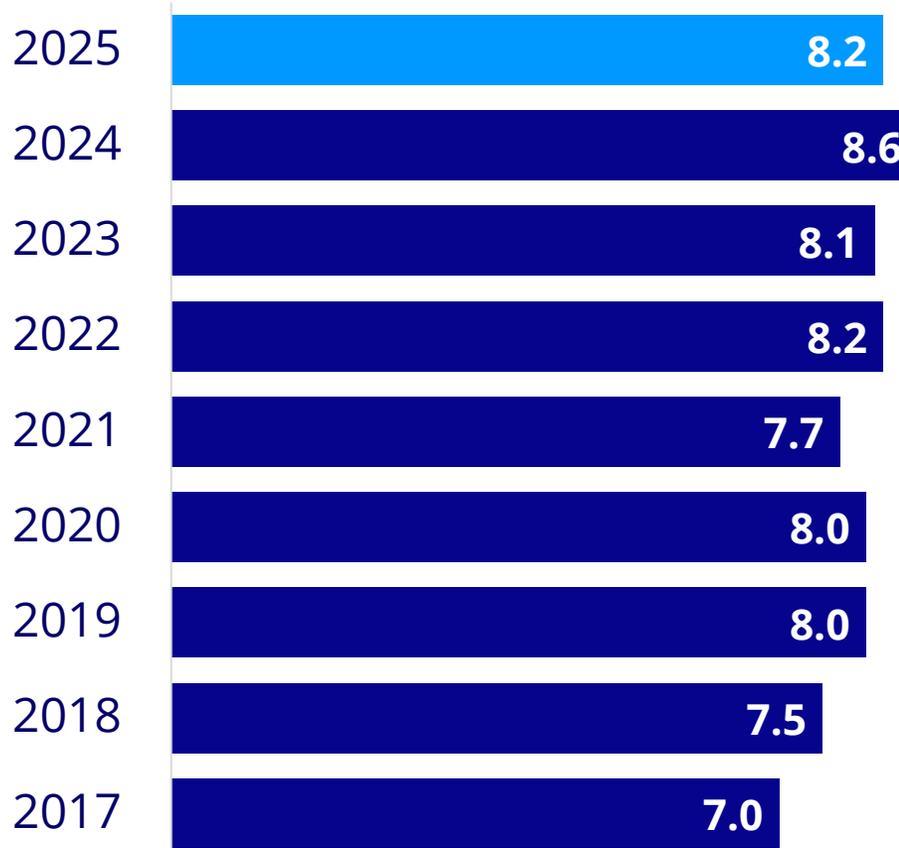
# Shipper Management – Satisfaction Score



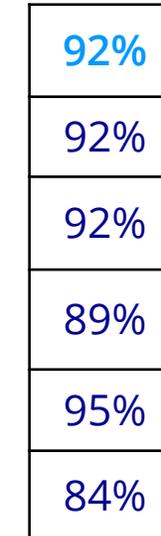
Overall, Shippers and Suppliers gave an average of 8.2/10 in terms of their satisfaction with Gas Networks' performance in 2025, equivalent to an overall satisfaction score of 92%, a stable picture on that in 2024.

This is against the backdrop where 45% of those interviewed stated that overall they felt GNI's performance had improved in the last year or so, 41% stated it had remained the same.

Average Satisfaction Score out of 10



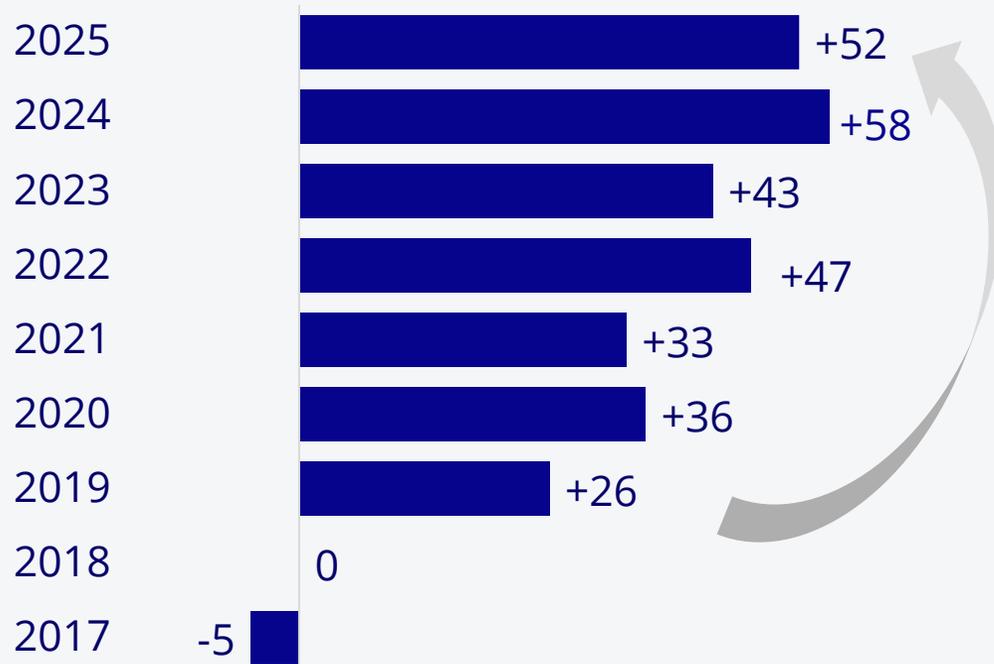
Overall Satisfied %



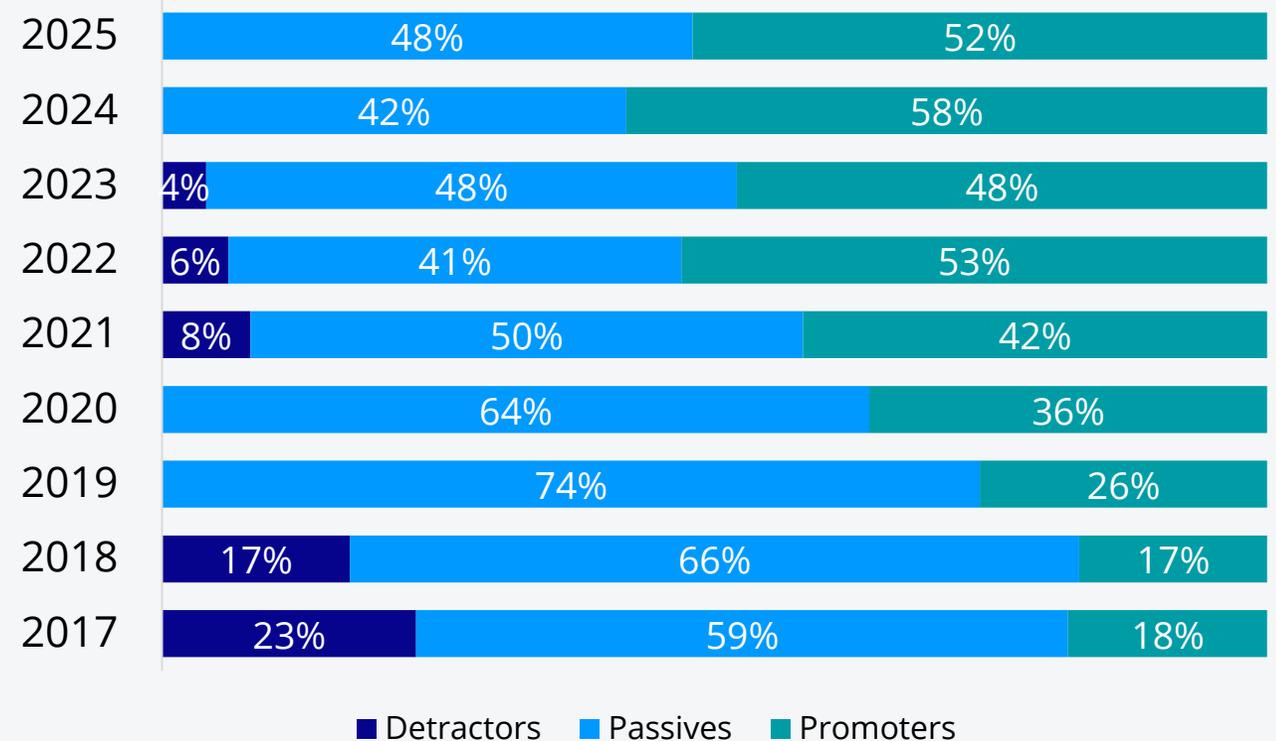
# Shipper Management - Net Promoter Score (NPS)

Our Net Promoter Score comes in at +52 in 2025, slightly down on the level of promoters in 2024 which stood at 58%, still representing double the NPS that we saw in 2019.

### (NPS) Net Promoter Score



### NPS Breakdown



## What has worked well in 2025

- General responsiveness
- Open channels of communications
- Progressing smart PAYG project
- Support for new entrants
- Engagement – particularly in relation to strategic issues
- Relationship building with Power Generation
- Bringing stakeholders together for renewables and leading the conversation
- Forging close partnerships in relation to renewables

## Where stakeholders identify potential improvements

- Greater engagement on both operational and strategic issues
- LTNA, resolution of payment/ technical/ legacy metering difficulties
- Urgency of moving Biomethane industry forward, and need for pace and collaboration
- Potential impact of RHO
- Power generation - connection timelines and costs

Topics	Comment and Actions
<b>Bilateral Engagements</b>	Bilateral and strategic engagements between Shippers and Suppliers were welcomed. <ul style="list-style-type: none"> <li>• Bilateral engagements (Supplier Operational Meetings, Strategic briefings etc.) to continue</li> <li>• GNI strategy workshop with Shippers to co-coincide with June / October CMF – details TBC</li> </ul>
<b>Supplier/Shipper Training</b>	Training provided in 2025 was welcomed by Suppliers. <ul style="list-style-type: none"> <li>• Structured programme of training events over the course of the to be repeated with addition of training session on GTMS. Details on later slide.</li> </ul>
<b>GTMS</b>	Shippers requested GTMS training and sought mechanism to seek improvements. <ul style="list-style-type: none"> <li>• GMTS training to be provided by GNI; and</li> <li>• Survey to be issued to seek suggested improvements / change requests.</li> </ul>
<b>LTNA</b>	LTNA identified as a driver of customer service issues for Suppliers: <ul style="list-style-type: none"> <li>• GNI to undertake 4 scheduled reads in 2026 with 2 estimated reads.</li> <li>• GNI programme underway to gain access to sites which have not been recently accessed by GNI.</li> <li>• Update of MPD 50.</li> </ul>
<b>Financial Security Calculator</b>	<ul style="list-style-type: none"> <li>• Following on from questionnaire issued as part of 2025 Action Plan, GNI is working to implement an online FS calculator to help Shipper estimate FS requirements. Estimated Go Live in Q3</li> </ul>

# Supplier/Shipper Training Programme 2026



Date	Topic	Contact
Thursday 26th Feb (Teams)	<b>GTMS Training:</b> This will cover all aspects of using the GTMS application as a Shipper. Ranging from Entry Capacity Bookings, Exit Capacity Bookings, Secondary Trading of Capacity, Nominations, IBP, Trading Platform Deals etc. This will be hands on training on the GTMS Test system with the Shipper using the application.	John Hawe <a href="mailto:john.hawe@gasnetworks.ie">john.hawe@gasnetworks.ie</a>  Gretta Cussen <a href="mailto:gretta.cussen@gasnetworks.ie">gretta.cussen@gasnetworks.ie</a>
Tuesday 16th June (Teams)	<b>GPRO/COS</b> GPRO refresher course updating shippers on GPRO processes: COS, Corrections and Amendments, Market Messaging, Historical Consumption Reports	Ken Galloway <a href="mailto:ken.galloway@gasnetworks.ie">ken.galloway@gasnetworks.ie</a>
June 2026 (Teams)	<b>AQ/SPC</b> AQ/SPC refresher course on AQ/SPC settings including recap on what are AQ/SPC settings, the annual setting process timetable, the relevant parameters, default profiles with calculation examples.	Grace Kingston <a href="mailto:Grace.Kingston@gasnetworks.ie">Grace.Kingston@gasnetworks.ie</a>
Wednesday 16 <sup>th</sup> September (Teams)	<b>PAYG</b> PAYG refresher course for shippers on PAYG processes: Payment Processor (Payzone), Back Office Provider (Siemens), New PAYG solution, suspense account.	Ken Galloway <a href="mailto:ken.galloway@gasnetworks.ie">ken.galloway@gasnetworks.ie</a>

## Code Modification Forum

Bi-monthly with shippers, CRU and GNI to consider Code of Operations changes, updates on wholesale market related topics such as biomethane, hydrogen, gas quality, and security of supply.

[conor.murphy1@gasnetworks.ie](mailto:conor.murphy1@gasnetworks.ie)

## Gas Market Arrangements Group (GMARG)

Bi-monthly with shippers, CRU and GNI to consider Code of Operations changes, updates on topics such as biomethane, hydrogen, gas quality, and security of supply.

[gmarg@gasnetworks.ie](mailto:gmarg@gasnetworks.ie)

## PAYG Programme Working Groups

GNI chairs several working groups focusing on IT Integrations Customer Care and Communications and Data Protection commencing in 2025 and continue to meet on a biweekly and monthly basis in 2026.

[gmarg@gasnetworks.ie](mailto:gmarg@gasnetworks.ie)

## Bilateral Engagements

GNI regularly meets shippers bi-laterally to discuss common issues such as supplier operations, wholesale market arrangements, connections and strategic interactions.

[Colm.oduibhir@gasnetworks.ie](mailto:Colm.oduibhir@gasnetworks.ie)



**Tx Connections:** Customers highlighted importance of project cost and timelines. GNI will continue to engage closely with these connection customers.



### **EPA and Emissions accounting**

Shippers welcomed ongoing pilots, outcome of which will be published in due course. Further details on existing guidance at <https://www.gasnetworks.ie/network/biomethane/eu-ets>



**Gas Quality:** This remains a regular area of focus at the Code Modification Forum, with substantial updates provided by GNI SMEs. Bilateral engagement with the Electricity Association of Ireland is also a key element of our stakeholder engagement on this topic.



### **Stakeholder Engagement Plans**

Overall stakeholder engagement viewed positively. Draft Stakeholder Engagement Plan issued for consultation. Any queries and/or responses to [stakeholder@gasnetworks.ie](mailto:stakeholder@gasnetworks.ie)



**RHO** – Stakeholders sought clarity and support for RHO. GNI will continue to include RHO under policy updates at CMF and Code Mod.



**Biomethane:** Stakeholders sought continued GNI advocacy for biomethane and which GNI will continue. Any queries on biomethane to [padraig.fleming@gasnetworks.ie](mailto:padraig.fleming@gasnetworks.ie)



Gas  
Networks  
Ireland

Moving Ireland's Energy

# 10. AOB Items/Next Meeting/Close of the CMF

# Next CMF Meeting

- The next CMF is on the 22<sup>nd</sup> of April in the Ashling Hotel, Dublin.

**Next CMF Meeting**



CMF Dates	Location
11 February	Virtual
22 April	Hybrid (Dublin)
10 June	Hybrid (Dublin)
9 September	Virtual
14 October	Hybrid (Dublin)
2 December	Virtual