



Gas
Networks
Ireland

Code Modification Forum

Minutes of Hybrid Meeting- 12 February
2025

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 04/12/2024 together with amended Minutes of the CMF meeting of 16/10/2024 were issued on 20/12/2024. The Transporter noted that they received no objection on the minutes. There were no comments at the meeting and both sets of Minutes were adopted.

2.2 Review of Action Items

Action items C572 and C587 will remain open. It was noted that item C572 is linked to Code Modification Proposal A115 (Removal of Tolerances at RNG Entry Points) which is under ongoing CRU review. Action items C587, C5600 & C5601 were closed out. Further Action Item C5602 was subsequently opened by the Transporter.

2.3 GNI Scheduled Maintenance Update

Kieran Quill, Senior Market Analyst at the Transporter, presented on Planned Maintenance, referring to Slide 8, Mr. Quill 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 Mitchelstown CGI, referring to Slides 22-24. In response to Mr. O’Riordan’s presentation, an Industry Representative queried the status of the construction works at Mitchelstown and how the Transporters timelines aligned with the Regulator’s planned consultation on the Regulatory arrangements for Direct Connections and CGIs in Q2 2025. Yvette Jones, Project Manager at the Transporter, stated that the Transporter has started enabling works in October 2024. She also detailed that the Transporter will be back on site to start construction in the summer and plans to start commissioning at the end of 2025. She also stated that the Transporter is in discussions with the Regulator about its Safety Case Submissions.

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, presented an update on Code Modification Proposal A111, referring to Slide 10. In response to Mr. Quill’s presentation, the Regulator agreed to extend their review period out to the 01/04/2025. This is a provisional status end date for the CRU Review Period which will be reviewed at the next CMF meeting. The Regulator noted that it is currently reviewing the Transporters proposal.

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, gave an overview of Code Modification Proposal A112, referring to Slide 12. He stated that the Transporter has been engaging with the Regulator’s Retail team on proposals for SOLR, in particular around a scenario where the failing Supplier is not the Shipper at an offtake. Mr. Quill stated that the Regulator requested information from current Suppliers on their Shipper/Supplier arrangements and several industry responses were received. The Regulator is considering the next steps on Shipper/Supplier following its review of these industry responses and the Transporter will continue to engage with the Regulator on the matter.

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

Kieran Quill, gave an overview of Code Modification Proposal A113 referring to Slide 14. In response, the Regulator agreed to extend their review period out to the 01/04/2025. This is a provisional status end date for the CRU Review Period which will be reviewed at the next CMF meeting. However, the Regulator noted that they are in the final stages of the review and that they will more than likely have a determination on this proposal before the next CMF meeting on the 01/04/2025.

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. In response, the Regulator agreed to extend their review period out to the 01/04/2025. This is a provisional status end date for the CRU Review Period which will be reviewed at the next CMF meeting. However, the Regulator noted that they are in the final stages of the review and that they will more than likely have a determination on this proposal before the next CMF meeting on the 01/04/2025.

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	01/04/2025*	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	01/04/2025*	CRU Determination
A115	Removal of Tolerances at RNG Entry Point	CRU Review	To allow the CRU to review the Code Modification Proposal Report	01/04/2025*	CRU Determination

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

5 Other Agenda Items

5.1 Gas and Electricity Generation

A representative from the PowerGen sector presented on the UK's proposed amendment to Gas Quality NTS Entry Specification at the St Fergus Shell System Entry Point on behalf of the Electricity Association of Ireland, referring to Slide 20. In response to the presentation, Michael Crowley, Asset Performance Manager at the Transporter, noted that historically St. Fergus terminal have their own gas quality specification which allows them to inject 4% CO₂ into the gas. He stated that the gas fields in St. Fergus are declining and that they will have to garner an exemption or curtail production due to the expense. Mr. Crowley referred to the fine trade off that exists between changes in gas specification and Security of Supply.

Stephen O'Riordan, Wholesale Market Manager at the Transporter agreed to take a follow up Action to discuss the impact of the situation in St. Fergus on the Transporters compressor stations in Scotland with the Asset Manager for Compressor Stations at the Transporter. Action Item C602 was opened by the Transporter. Another representative from the Power Generation sector queried whether any detail has emerged on how the changes in Nitrogen and CO₂ will impact the characteristics of the gas. The PowerGen representative responded that he did not know but will try build a picture as the Code Modification proposal progresses in the UK.

The Regulator queried the Power Gen representative as to whether he was more concerned about the potential Security of Supply impacts or the potential impact on emissions for the Power Gen sector. He responded that he is initially concerned about both operational and CO₂ impacts.

5.2 Update on Security of Supply

Aidan Bugler, Network Operations Emergency Response Manager at the Transporter, provided an update on Security of Supply. In response to the presentation, a representative from the Power Gen sector queried whether there is a sense that the scenario in the Exercise Meabh exercise which envisaged a six month outage as a result of an incident disrupting both UK/Ireland Interrconnectors, had changed from something that is highly unlikely to happen to something that is more likely to occur. He also expressed concern about the potential third party impacts of some of the outcomes from such an event happening. He particularly highlighted the availability of trucks to deliver oil to states as a secondary fuel backup.

In response, Mr. Bugler noted that the risk of such a scenario taking place is quite real and that the logistical concerns that the Power Gen Sector representative expressed were reviewed in detail. He detailed that there is new legislation that allows the relevant Minister to direct NORA on where to allocate fuels in the event of an emergency.

A shipper representative raised a question around the status of the review of the Code of Operations in relation to commercial arrangements, particularly for producers who may not

have any or adequate commercial arrangements in place with Shippers acting under NGEM directions. Mr. Bugler stated that at a EU exercise, the issue was raised by Ireland and other Member States without any conclusive response.

The Shipper representative responded that in the event of the loss of the Interconnectors from Scotland, the producers from the Corrib field would, with the exception of negligible biomethane supplies be the only suppliers into the Irish gas system and that they had no insight on how they would be paid. The Regulator asked the representative if he had examples of any other jurisdiction where such financial guarantee arrangements have been put in place.

Mr. O’Riordan noted that the Code of Operations is subject to instruction from the Regulator with regard to amendment and implementation. Mr. O’Riordan stated that the Transporter would be hesitant to initiate and progress any fundamental provision without the Regulator’s involvement and suggested setting up a meeting offline in which the Regulator should attend. The Regulator stated that under the code, members can propose modifications to the code.

It was then suggested that the Shipper Representative draft an initial outline of a Proposal and furnish to the Transporter. It was also agreed to copy the Regulator in this correspondence.

5.3 GNI Update on EU Affairs

On Slides 31-39;

- Tom Lyons, GNI EU Team, gave a presentation on recent EU legislative developments
- Mary O’Mahony, GNI EU Team, gave a presentation on the EU Competitiveness Compass
- Kieran Quill, GNI Wholesale Team, gave a presentation on the proposed revision of the CAM Network Code
- Ryan O’Connell, GNI Wholesale Team, gave a presentation on REMIT recast.

6 Next Meeting/AOB

The next meeting is a Hybrid meeting scheduled for the 01/04/2025 and will be hosted at the Ashling Hotel, Dublin.

Colm O Duibhir, Regulator Operations Manager & Kieran Quill, presented on GNI Shipper Survey Results (Slides 45 – 48) and Registration requirements at the South-North IP (Slide 50) respectively.

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	Completed
C600	Transporter to provide an update on North South flows	GNI	16/10/2024	Completed

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	Completed
C602	Transporter Asset Manager for Compressor Stations to review potential impacts of gas quality changes at St. Fergus	GNI	12/02/2025	Ongoing

8 Calendar of meeting for 2024

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

Next CMF Meeting



9 Attendees

Name	Organization
Conor Murphy	GNI
Kieran Quill	GNI
Stephen O’Riordan	GNI
Ryan O’Connell	GNI
Aidan Bugler	GNI
Mary O’Mahony	GNI
Stephen O’Hare	GMO
Emma O’Leary	EAI
Anthony Foody	ESB
Colm Griffin	Energia
Michael Crowley	GNI
Paul Crowley	GNI
David Grainger	BGE
Mark Phelan	Energia
Claire Walsh	Centrica
Brian McGlinchey	Vermilion
Aine Spillane	GNI
Tom Nolan	Ormonde
Stephen English	GMO
Michael Murphy	Ormonde
Paul Murphy	ESB
Theres Lannon Crean	SSE
Sam Clutterbuck	Ceres
Sean Crowley	GNI
Paul Hoey	Electric Ireland
Gillian Farrelly	Flogas
Paul Hoey	Electric Ireland
Yvette Jones	GNI
Bryan Hennesey	Flogas

Liam Nolan	GNI
Keith Deacon	Axpo
William Carr	ESB
Colm O'Duibhir	GNI
Sean Mac an Bhaird	CRU
Padraic Duffy	CRU
Lauren Markey	CRU
David Lindsay	CRU

Code Modification Forum

Wednesday, 12th of February 2025

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 Security of Supply</i>	10	11:30 - 11:40
12.	<i>Presentation on GNIs Innovation Fund</i>	10	11:40 - 11:50
13.	<i>GNI update on EU Affairs</i>	30	11:50 - 12:20

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

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 316 613 014 784

Passcode: xe7AJ67M

Code Modification Forum – Virtual Meeting



Wednesday, 12 February 2025 – 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 Security of Supply
12. Presentation on GNIs Innovation Fund
13. GNI update EU Affairs
14. AOB Items/Next Meeting/Close of the CMF

1. Review of minutes from last meeting

- [Minutes](#) of CMF meeting of 04 December were issued on 20 December.

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	Completed

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C600	Transporter to provide an update on North South Flows	GNI	16/10/2024	Completed
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	Completed

3. Maintenance Days



Kieran Quill – Senior Market Analyst

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	01/04/2025*	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.
- The CRU have accepted the Safety Case submission relating to the realignment of the gas quality specification with the amended Gas Safety Management Regulations (GSMR) .
- **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	01/04/2025*	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, November; 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	01/04/2025*	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	01/04/2025*	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	01/04/2025*	CRU Determination
A115	Removal of Tolerances at RNG Entry Point	CRU Review	To allow the CRU to review the Code Modification Proposal Report	01/04/2025*	CRU Determination

9. Gas and Electricity interaction



Alexandra Murphy / Emma O'Leary – Electricity Association of Ireland



UNC_0898 - Amendment to Gas Quality NTS Entry Specification at the St Fergus Shell System Entry Point

- The main St Fergus terminal receives gas from three sub-terminals, currently owned by Shell, Ancala and North Sea Midstream Partners (NSMP).
- The 2 smaller sub-terminals (Ancala and NSMP) have a permanent entry spec of 4mol% and both also have UNC Modifications in place to allow higher CO₂.
- Shell has asked for their CO₂ limit to be raised to 4%. This is proposed to
 - promotes competition between Shell and the other sub-terminal operators
 - gas security of supply

Risk of Impact on Beattock?

- National Gas produced network penetration studies that showed that the only affected power plant was SSE Peterhead which was in the red zone (high probability) of receiving higher carbon dioxide gas.
- The GNI Beattock compressor station that feeds NI and ROI was shown in the yellow affected zone (medium probability)
- National Gas had asked for an exemption to allow them to refuse high CO₂ gas if it effected their compressors.
- Could a similar exemption be needed for Beattock.
- Even where balanced by reducing N₂, increasing CO₂ in the gas stream will have a direct effect on emissions

A number of other UNC mods are looking at deviations to gas specification at entry.



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

- 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.

CGI next steps

- CRU is currently considering the **Business Rules** and **CGI standard contributions** proposals submitted by GNI
- CRU is planning to consult on Regulatory arrangements for **Direct Connections and CGIs** in Q2 2025 covering;
 - Financial Security
 - Economic Test
 - Reverse Compression
 - CGI Standard Contribution
- The consultation will also outline timelines for potential progression towards a developer choice model.

11. Update on Security of Supply



Aidan Bugler – Network Operations Emergency Response Manager

12. Presentation on GNIs Innovation Fund



Liam Nolan – Head of Technical Training & Technical
Development

PC5 Innovation Fund

- The Commission for Regulation of Utilities (CRU) in its decision paper 'CRU Decision on the PC5 Regulatory Framework Decision Paper' set out its decision for the arrangements for the Innovation Fund for the PC5 period.
- The CRU provided total innovation funding of €5.3m. This comprised:
 - Strategic Innovation Fund (SIF) of €1.5m
 - Network-Based Innovation Fund (NBIF) of €3.8m
- The GNI Innovation Steering Group (ISG) acts as the governance board for the innovation funding
- For further information refer to the [Innovation page](#) on the GNI website.

Independent Members

Applications for the role of Independent Member

- Gas Networks Ireland is seeking applications for the role of Independent Member of the GNI Innovation Steering Group.
- Details of the role responsibilities and application process are outlined in the published document:
 - [‘Call for Innovation Steering Independent Members and associated consultation’](#).
- Applications using the application form in the document appendix to be submitted to innovationfund@gasnetworks.ie by 28 February 2025.

Consultation on Governance Arrangements

- Gas Networks Ireland also invites comments on the governance arrangements for the innovation fund and the proposal to appointment two independent members for a term until October 2027.
- Responses to the consultation document to be submitted to Gas Networks Ireland at innovationfund@gasnetworks.ie by 28 February 2025.

13. GNI update on EU Affairs



Tom Lyons, Mary O'Mahony, Kieran Quill & Ryan O'Connell

13 (A). General European Update



Tom Lyons & Mary O'Mahony – GNI EU Affairs

The purpose of this presentation is to provide an update on emerging Energy and Climate Policy developments at EU level

EU legislative developments we are monitoring closely at present include:

- **EU Gas & Hydrogen Package (GHP):** The package updates the rules on the EU natural gas market set out in the Gas Directive 2009/73/EC and the Gas Regulation 715/2009 (3rd Gas Package). The GHP Regulation has been applicable since February 5th 2025.
- **Pre-European Network of Network Operators for Hydrogen (ENNOH)** formally established in December 2024 with GNI appointed pre-ENNOH Board. Pre-ENNOH will carry out EU legislative tasks until the establishment of ENNOH.
- **Methane Emissions Reduction Regulation:** The Regulation was published in OJEU on 15th July 2024 and entered into force on 4th August. Awaiting appointment of the competent authority to oversee effective compliance with the Regulation.
- **Net Zero Industry Act (NZIA):** The Regulation defines a series of net zero technologies, which include hydrogen, biomethane and CCUS technologies. Single points of contact required (per NZIA) to be appointed. The single points of contact will facilitate and coordinate permit-granting process for net-zero technology manufacturing / strategic projects.

Key European Gas Associations – An overview



ENTSOG - Established by the Third Energy Package in 2009 and as a cooperation initiative of the European gas TSOs.



Eurogas - Represents the European gas wholesale, retail and distribution sectors.



Gas Infrastructure Europe (GIE) - Represents the interests of the infrastructure industry in the natural gas business such as Transmission System Operators, Storage System Operators and LNG Terminal Operators.



GD4S | Gas Distributors For Sustainability incorporates eleven major European Gas distribution system operators from eight EU Member states.



ENNOH - The European Network of Network Operators for Hydrogen will be the organisation for the cooperation of the EU Hydrogen Transmission Network Operators (HTNOs).

Commission 2024-2029 - European Commission - commenced on December 1st 2024 *

Dan Jørgensen (DK) appointed as **Energy Commissioner** with responsibility for:

- Completing the Energy Union and **supporting the implementation of the climate and energy framework for 2030**
- Proposing an initiative to **boost the roll-out of renewable energy and energy storage**
- Creating an **action plan to ensure that Europe's transition towards net zero is powered by an energy system with homegrown, clean electricity**
- Developing a roadmap towards ending Russian energy imports and ensuring the **full implementation of REPowerEU**
- Proposing a **dedicated strategy on investment in clean energy infrastructure**
- Finding ways to **upgrade and expand our grid infrastructure**
- Making proposals to **encourage and increase the use of carbon capture and storage**
- Adapting the **security of our energy supply to the current geopolitical context**
- Increasing **citizens' participation in the energy transition** and strengthen the social dimension of the Energy Union

Expressed commitments in relation to **energy transition/decarbonisation** notable for GNI and the gas industry, with detail included on (not limited to) the EC's positioning on renewable energy, hydrogen, energy efficiency / demand reduction and energy system integration.

- Creating European hydrogen market by 2030.
- Gas market rules to be implemented to facilitate biomethane trade.
- The need for better integration of the various elements of the energy system, including power, heat and hydrogen.

* Ireland will hold its (six month) **tenure of the EU Presidency from July-December 2026**



The first major initiative of this mandate providing a strategic and clear framework to steer the Commission's work. [EU Competitiveness Compass Factsheet - Competitiveness Compass.pdf](#)

- Establishes **competitiveness** as one of the EU's overarching principles for action.
- *Draghi Report* (Sept '24) identified three transformational imperatives to boost competitiveness, and the Compass sets out an approach *and a selection of flagship measures* to translate each of these imperatives into reality.
- Three core areas (Pillars) for action: **Innovation, Decarbonisation** and **Security**.

Pillar 1 Closing the Innovation Gap

The first pillar is about driving productivity through innovation.

The Commission will work to create a new dynamism for Europe's industrial structure.

Pillar 2 A joint roadmap for decarbonisation and competitiveness

This pillar is about integrating decarbonisation policies with industrial, competition, economic and trade policies. They are a powerful driver of growth when they are well integrated.

Pillar 3 Reducing excessive dependencies and increasing security

This pillar is about integrating more tightly security and open strategic autonomy considerations in the EU economic policies. The security environment is a precondition for EU firms' economic success and competitiveness.

EU Policy / Regulatory Update

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

- The **EU hydrogen and gas decarbonisation package (GHP)** was published in the in the EU Official Journal on 5th August 2024. The package updates the rules on the EU natural gas market set out in the Gas Directive 2009/73/EC and the Gas Regulation 715/2009 (3rd Gas Package)
- The Package consists of Directive (EU) 2024/1788 and Regulation (EU) 2024/1789. The Directive is to be transposed by 5th August 2026 and the Regulation has been fully applicable since 5th February 2025. [Hydrogen and decarbonised gas market](#)
- **Based on initiatives raised by the by the European Commission such as the EU Green deal and Fit for 55, the GHP Introduces new requirements for Gas TSOs across the EU to work upon including network code modification, tariff design, corporate structuring (unbundling), network development planning and certification requirements.** When the GHP will be fully applied and transposed, the package will facilitate the uptake of renewable and low-carbon gases, including hydrogen, while ensuring security of supply and affordability of energy for all EU citizens.
- With the regulation 2024/1789 fully applicable since the 5th February 2025, work has been undertaken by GNI to engage with stakeholders to progress its implementation.
- **Pre-ENNOH** formally established in December 2024, with Edwina Nyhan appointed to the Board on behalf of GNI. ENNOH expected to be formally established in Q3 2025.

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

The Regulation was published in OJEU on 15th July 2024 and entered into force on 4th August. The Regulation introduces obligations including:

- Minimum leak survey intervals along with mandated minimum time for leak repairs;
- Accurate quantification and reporting on methane emissions; and
- Avoidable venting and flaring of natural gas to be prohibited.
- Awaiting appointment of the competent authority to oversee effective compliance with the Regulation.

Net Zero Industry Act (June 2024) [The Net-Zero Industry Act](#)

- The Regulation was published in OJEU on 28th June 2024 and entered into force the next day.
- The Regulation defines a series of net zero technologies, which include hydrogen, biomethane and CCUS technologies.
- Single points of contact to be appointed. The single points of contact will facilitate and coordinate permit-granting process for net-zero technology manufacturing / strategic projects.

13 (B). CAM NC Update



Kieran Quill – Senior Market Analyst

- The European Union is in the process of revising its Capacity Allocation Mechanisms Network Code (CAM NC) to enhance the efficiency and transparency of gas transmission across member states. [RECOMMENDATION No 02/2024](#)
- ACER has been leading this initiative, culminating in a set of proposed amendments submitted to the European Commission in December 2024.
- There has been 5 key areas highlighted for potential amendments;
 1. Maximising the offer of Firm Capacity
 2. Maximising the offer of interruptible capacity
 3. Improved offerings i.e. auction improvements, new capacity products, frequency.
 4. Consideration of incremental capacity process
 5. Over arching review of further topics including implicit allocation, [application of revised CAM NC to Third Countries](#), booking and platform selection.
- The European Commission will now consider ACER's recommendations and may proceed with amending the network code through the comitology process

- Regarding Capacity Auctions ACER is proposing the following;
 - After the closure of annual, quarterly or monthly auctions, any unbooked capacity shall be offered in additional auctions.
 - During the monthly capacity auctions network users shall be able to apply for up to three individual monthly standard capacity products
 - A balance-of-the-month product to be developed and offered
 - Auction times may be slightly changed
- TSOs will be required to re-calculate capacity at least every two years using a dynamic approach with subsequent systemisation costs recoverable through tariffs - TSOs will be required to publish;
 - joint method to calculate and maximise firm capacity
 - methodology to calculate and maximise interruptible capacity
- Technical CAM NC Parameter Modification Process – ACER proposes a quick modification process to modify non-essential technical CAM NC parameters and align them to changing market conditions.

Timelines and implementation

- The European Commission will now consider ACER's recommendations and may proceed with amending the CAM Network Code through the comitology process – important to remember that these are just proposals at this stage and may change.
- What will be of interest will be the extent to which the UK adopts these proposals; if the UK does not apply the new CAM NC amendments, then Ireland will not be able to comply, and we will need to seek a derogation.
 - ENTSOG requested that the Regulation should be updated to apply in whole or in part to entry points from and exit points to third countries, subject to the decision (at any time) of the relevant national regulatory authority.
 - However, ACER are not in favor of this proposed amendment by ENTSOG and are expected to propose automatic applicability of Network Codes to entry and exit points with third countries.
- The timelines are not yet clear, and the EC will have to allow for implementation timelines at National level.
 - If there is positive response from the UK and the CAM NC comes into effect, this will require changes to the GNI Code of Operations and subsequent systemization (including updates to the PRISMA platform).
 - We expect that the EC will allow sufficient implementation time for all of this work to be complete across EU Member States - we expect this to be at least two years away from implementation and there are no guarantees on timelines.

13 (C). REMIT Recast



Ryan O'Connell – Market Development Analyst

REMIT Recast

- 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.

Key findings from the 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.

Points to Note:

- The proposal to substitute the term “Person professionally arranging transactions (PPAT)” to “Person professionally arranging and executing transactions (PPAET)” to align it with the notion in Market Abuse Regulation will turn every Market Participant into a PPAET with surveillance obligations. This will add additional compliancy requirements for Traders such as registering with NRA.
- Changes to the definition of energy products.
- New rules for algorithmic trading
- New definition for Organised Market places (OMPs), new obligations of the Organised Market Places (OMP) to report to ACER the “full order book”
- Within six months of REMIT II coming into effect, third-country market participants who are not residents nor established within the EU must designate a representative in the EU.
- Increasing ACERs investigative and enforcement powers.

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.
- Petr Kus ENTSOG new DG will meet with ACER and European Commission
 - Agenda:
 - REMIT Implementing Regulation Revision
 - Delegated Acts on RRM and IIP requirements
 - Implementation timeline of REMIT IR and DAs
- ENTSOG REMIT KG invited to respond to a closed consultation.
- ACER will continue to provide timely updates and guidance notes.
- The Commission will then amend the Implementing Regulation to define the new data reporting requirements by 8 May 2025.

The ANNEX IX of TRUM – Guidance on the definition of Organised Marketplaces was published by ACER in December 2024:

[ACER_REMIT_TRUM_ANNEX_IX_v1.0.pdf](#)

Changes in the Final Version: 3.4.1 “One to many” platforms that may be in scope of the OMP criteria is TSO platforms:

14. AOB Items/Next Meeting



Gas
Networks
Ireland

14 (A). GNI Shipper Survey Results



Colm O'Duibhir – Regulatory Operations Manager

Shipper Survey Results

Overall, Shippers and Suppliers gave an average of 8.6/10 in terms of their satisfaction with Gas Networks' performance, equivalent to an overall satisfaction score of 92%, a substantial shift upwards on 2023.

Overall Satisfaction with GNI



Understanding of your business



Stakeholder understanding: Shippers, who believed that Gas Networks had a deep understanding of their needs, scored the organisation highly. It was the foundation for good working relationships, and decision making that would benefit all.

Taking the lead: Gas Networks continues to be perceived as a leader within the industry in Ireland, due to its position as the national gas utility, and the perceived calibre and expertise of its people and thinking

Strategy: Perceptions of Gas Networks' strategic intent saw the greatest shift in 2024, Shippers' being predominantly positive and considering GNI to be driving forward (while having questions about cost and timelines).

PAYG: The PAYG replacement project has been positively received by Suppliers, Going into 2025 Suppliers will require a clear outline of tasks, timelines and an understanding of the resourcing required on their part.





ACTION – Power Gen

The challenges facing those within Power Gen were evident from the interviews.

The need to manage costs and operations in the midst of changing eirgrid demands, future gas quality and implications for plant and equipment, the cost of new connections, and the economics of capacity booking were highlighted.



Interviews highlighted the importance of Gas Networks working in partnership with Power Gen, so both can plan for the future.

Most important is for Gas Networks to engage and consult closely, both on an industry basis, and also bilaterally, so there is a shared understanding of the challenges, and an open conversation on what initiatives might be considered to address some of the difficulties in relation to:

- Gas quality
- Cost of new connections



ACTION – Strategy

Shippers' perceptions of Gas Networks' strategic intent saw the greatest shift in 2024, Shippers' being predominantly positive, if not without questions on cost and time.

At a time of accelerated change across the energy industry, where innovation and pace are required in the development of renewable alternatives, Gas Networks' pathway to net zero is considered to be of critical importance.



In the coming months and years Gas Networks will need to ensure they:

- Demonstrate an acute understanding of the implications of each path on Shippers and their customers
- Work in partnership with Power Gen, to ensure the country's need for electricity is prioritised
- Show they are taking international practice into account when it comes to the development of renewable gases
- Lobby Govt and industry stakeholders, to ensure participation in the industry is encouraged
- Are open and transparent, in providing updates on progress, challenges, and costs.
- Demonstrate efficient operations at every stage of development.

14 (B). Registering at South-North IP



Kieran Quill – Senior Market Analyst

Shippers who wish to deliver gas via the South North IP which will require:

- Registration at the South North IP with both GNI and GMO NI.
 - Registration on PRISMA with GNI and GNI(UK).
 - Sufficient credit support in place with GNI and GMO NI to secure Daily Capacity.
 - Active registered users of the IT systems (Delphi, GTMS and PRISMA).
 - Internal nomination procedures which reflect that Single Sided Nominations are submitted on Delphi.
- 1) On the Gormanston Exit side you will need to send us a formal request to be registered for Gormanston Exit (send request to me) and we will then set you up on GTMS – please provide details of users requiring access also.
 - 2) You will need to deal directly with GMO NI to register with them - the person to contact is Stephen English – see his details below:
 - stephen.english@gmo-ni.com

14 (C). Close of CMF



Upcoming Meetings

- The next CMF is proposed to take place on the 1st of April 2025 in the Ashling Hotel Dublin.
- GNI is also proposing to change the **meeting date of in the in-person stakeholder event to the 4th of June (TBC).**

Next CMF Meeting


CMF Dates	Location
12 February	Virtual
1 April	Hybrid (Dublin)
5 June (TBC)	Hybrid (Dublin)
3 September	Virtual
15 October	Hybrid (Dublin)
3 December	Virtual

**Thank you for your
participation**



**Gas
Networks
Ireland**

Appendix

Recent EU releases / Items of interest

Useful resources at a glance

EU Gas Associations

[ENTSOG](#)

[Gas Infrastructure Europe \(GIE\)](#)

[Eurogas](#)

[ENNOH](#)

[GD4S | Gas Distributors For Sustainability](#)

EU legislation

[Hydrogen and decarbonised gas market](#)

[Methane emissions - European Commission](#)

[The Net-Zero Industry Act](#)

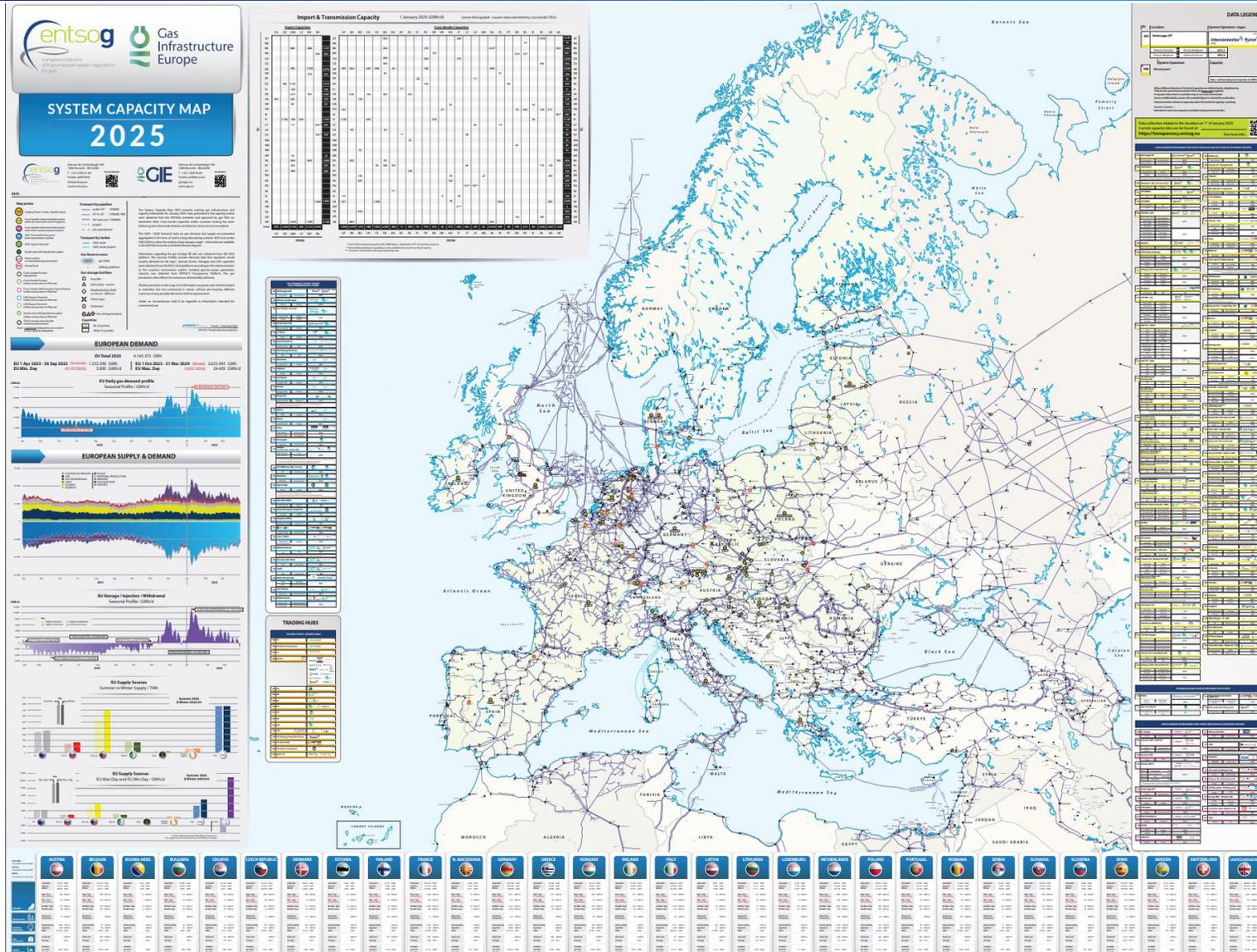
European Commission 2024-2029

[Commission 2024-2029 - European Commission](#)

[EU Competitiveness Compass](#)

[Factsheet - Competitiveness Compass.pdf](#)

2025 System Capacity Map - January 2025



- Published jointly by **ENTSO-G** and **GIE**, this map illustrates the **latest European gas infrastructure and capacities**, providing useful gas market data for **enhanced transparency**.
- The map also presents **import and transmission capacity data** as of date of publication.