

CODE OF OPERATIONS MODIFICATION PROPOSAL



Modification details				
Modification Number: A118		Modification Title: Central Grid Injection and RNG Entry Point arrangements		
Modification Proposer:	Modification Representative:	Modification Representative Contact Details (email address):	Date Submitted:	Proposed Implementation Date:
Gas Networks Ireland	Stephen O’Riordan	stephen.oriordan@gasnetworks.ie	26 January 2026	To be confirmed.
Proposal (including rationale):				
Code Modification A118 is proposed to update the Code of Operations to allow for the introduction and operation of Central Grid Injection (“CGI”) Facilities as part of the GNI Transportation System and in doing so, to achieve a level of consistency with the treatment of Renewable Natural Gas (“RNG”) Entry Points. This Proposal is accompanied by a suite of constituent documents issued on 26 January 2026, which comprises of; • Code Modification Proposal Explanatory Memorandum; • Central Grid Injection and RNG Entry Point arrangements Business Rules; and • Proposed Modified Code of Operations text, Parts A, C, D, E, F, G, H and I. 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.				
Proposed Implementation Date:				
To be confirmed.				

Proposed section of the Code to be modified:

In order to give effect to the arrangements outlined in Code Modification Proposal A118, the Proposed Modified Code of Operations text includes proposed amendments to Parts A, C, D, E, F, G, H and I of the Code, reflecting the changes required to support CGI and RNG Entry Point arrangements.

The primary detail underlying these arrangements is addressed in Sections 5 and 6 of the Business Rules. These sections describe specific processes, responsibilities and code interactions required to support the operation of CGI Facilities and RNG Entry Points and should be read alongside the other constituent documents of the A118 Proposal.

As detailed above, the Business Rules accompanying this proposal are circulated for information and industry discussion. The Business Rules exist for the sole purpose of guiding this Code Modification Proposal and has no binding effect.

Modification motivation

Intended Outcome of the Proposed Modification:

The intended outcome of this Code Modification is to establish a set of straightforward, transparent and easily understood rules governing the operation of CGI Facilities and RNG Entry Points. The key objective is to ensure simplicity by avoiding unnecessary complexity, thereby providing clarity for industry on how these types of Entry Points will operate under the Code.

The modification is designed so that all CGI Facilities and RNG Entry Points are subject to consistent principles, with aligned Shipper arrangements and uniform operational requirements. This ensures that market participants can rely on stable, predictable and harmonised procedures. In addition, the Code Modification aims to ensure that the new arrangements are aligned with the existing structure, principles and mechanisms of the Code of Operations, minimising the extent of Code changes and also reinforcing GNI's obligation as Transporter to operate on a non-discriminatory basis.

Benefits of implementing this Modification:

The implementation of this Code Modification will directly support Ireland's national climate and energy objectives. Ireland has committed to an average 7 per cent per annum reduction in overall greenhouse gas emissions from 2021 to 2030, a 51 per cent reduction over the decade relative to 2018 levels, and to achieving net zero emissions by 2050. The Government has also committed to the delivery of up to 5.7 TWh of indigenously produced biomethane by 2030 to help meet its Climate Action targets. Enabling clear, consistent and operationally robust

arrangements for CGI and RNG Entry Points provides a structured pathway for the integration of RNG onto the gas network, which is essential for meeting these national commitments.

The nascent Irish biomethane industry has huge potential, as Ireland has significant volumes of agricultural waste materials available as feedstock for biomethane production. The agriculture sector is of vital importance to Ireland and the wider Irish economy. By supporting and enabling a renewable gas economy that captures methane and waste emissions from agricultural by-products, the gas network can make a meaningful contribution to reducing emissions from agriculture. This presents Ireland with the opportunity to establish a biomethane industry that also stimulates the rural economy, enhances farm incomes and supports job creation.

The Mitchelstown CGI (and other similar facilities) will additionally provide significant benefits for off-site RNG Producers who are not located close enough to the gas network to make direct pipeline connections financially viable. By enabling producers to transport RNG by road to the CGI Facility and decant it for injection into the Transportation System, the Code Modification broadens access to the gas network and supports the development of a diverse and scalable biomethane supply chain. This ensures that renewable gas can be produced across a wider geographic area while still contributing to Ireland's decarbonisation and energy security goals.

Consequences of not making this Modification:

If this Code Modification is not implemented, there will be no framework within the Code of Operations to support the introduction of CGI Facilities, to achieve a level of consistency with the treatment of RNG Entry Points. This would create uncertainty for Shippers and RNG Producers, hinder the development of a scalable biomethane industry, and restrict access for off-network producers who rely on CGI Facilities to inject RNG into the system.

In 2022 the Irish Government agreed to part fund the Mitchelstown CGI Facility through its Climate Action Fund (CAF). Failure to implement this Code Modification would also put at risk the delivery of the Climate Action Fund-supported Mitchelstown CGI Facility, which is expected to contribute up to 12% of Ireland's 2030 biomethane target.

Furthermore, on the 28th of May 2024, the Government launched the National Biomethane Strategy. The strategy sets out a combination of high-level scenarios required for the deployment of a biomethane sector in Ireland. This combination includes the development of a larger number of smaller, farm-scale AD facilities, which a majority of these would due to their size and location, would need to transport their gas via truck and trailer to CGI Facilities. Failure to implement this Code Modification Proposal would put at risk the delivery of the National Biomethane Strategy, including the national 2030 biomethane target of 5.7 TWh.

Regulatory Impact Assessment:

The proposed modification is expected to have a positive regulatory impact by providing a clear, consistent and non-discriminatory framework to support the introduction and operation of CGI Facilities, to achieve a level of consistency with the treatment of RNG Entry Points. Implementing this modification will enhance regulatory certainty for Shippers, RNG Producers and other market participants by embedding transparent operational rules within the Code of Operations and ensuring alignment with well-established Code principles.

Illustrative Example (Please enter a scenario where the issue and solution are illustrated):

Please refer to the Business Rules for a detailed overview of the Code Modification Proposal.

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Modification motivation

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The intended outcome of this Code Modification is to establish a set of straightforward, transparent and easily understood rules governing the operation of CGI Facilities and RNG Entry Points. The key objective is to ensure simplicity by avoiding unnecessary complexity, thereby providing clarity for industry on how these types of Entry Points will operate under the Code.

The modification is designed so that all CGI Facilities and RNG Entry Points are subject to consistent principles, with aligned Shipper arrangements and uniform operational requirements. This ensures that market participants can rely on stable, predictable and harmonised procedures. In addition, the Code Modification aims to ensure that the new arrangements are aligned with the existing structure, principles and mechanisms of the Code of Operations, minimising the extent of Code changes and also reinforcing GNI's obligation as Transporter to operate on a non-discriminatory basis.

Benefits of implementing this Modification:

The implementation of this Code Modification will directly support Ireland's national climate and energy objectives. Ireland has committed to an average 7 per cent per annum reduction in overall greenhouse gas emissions from 2021 to 2030, a 51 per cent reduction over the decade relative to 2018 levels, and to achieving net zero emissions by 2050. The Government has also committed to the delivery of up to 5.7 TWh of indigenously produced biomethane by 2030 to help meet its Climate Action targets. Enabling clear, consistent and operationally robust

arrangements for CGI and RNG Entry Points provides a structured pathway for the integration of RNG onto the gas network, which is essential for meeting these national commitments.

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Consequences of not making this Modification:

If this Code Modification is not implemented, there will be no framework within the Code of Operations to support the introduction of CGI Facilities, to achieve a level of consistency with the treatment of RNG Entry Points. This would create uncertainty for Shippers and RNG Producers, hinder the development of a scalable biomethane industry, and restrict access for off-network producers who rely on CGI Facilities to inject RNG into the system.

In 2022 the Irish Government agreed to part fund the Mitchelstown CGI Facility through its Climate Action Fund (CAF). Failure to implement this Code Modification would also put at risk the delivery of the Climate Action Fund-supported Mitchelstown CGI Facility, which is expected to contribute up to 12% of Ireland's 2030 biomethane target.

Furthermore, on the 28th of May 2024, the Government launched the National Biomethane Strategy. The strategy sets out a combination of high-level scenarios required for the deployment of a biomethane sector in Ireland. This combination includes the development of a larger number of smaller, farm-scale AD facilities, which a majority of these would due to their size and location, would need to transport their gas via truck and trailer to CGI Facilities. Failure to implement this Code Modification Proposal would put at risk the delivery of the National Biomethane Strategy, including the national 2030 biomethane target of 5.7 TWh.

Regulatory Impact Assessment:

The proposed modification is expected to have a positive regulatory impact by providing a clear, consistent and non-discriminatory framework to support the introduction and operation of CGI Facilities, to achieve a level of consistency with the treatment of RNG Entry Points. Implementing this modification will enhance regulatory certainty for Shippers, RNG Producers and other market participants by embedding transparent operational rules within the Code of Operations and ensuring alignment with well-established Code principles.

Illustrative Example (Please enter a scenario where the issue and solution are illustrated):

Please refer to the Business Rules for a detailed overview of the Code Modification Proposal.



CODE OF OPERATIONS

NOTICE TO SHIPPERS

PURSUANT TO THE CODE OF OPERATIONS

APPROVAL OF MODIFICATION

CODE MODIFICATION A118 – ‘Central Grid Injection and RNG Entry Point Arrangements’.

COMMISSION RATIONALE

Pursuant to Section 13(1) of the Gas (Interim) (Regulation) Act 2002, the Commission approves Code Modification A118 – ‘Central Grid Injection and RNG Entry Point Arrangements’.

Code Modification A118 changes Parts A, C, D, E, F, G, H and I of the Code of Operations to facilitate the introduction of a Central Grid Injection facility (CGI), owned and operated by GNI, and align the treatment of such a facility and that of renewable natural gas (RNG) entry points.

Background

Code Modification A118 is to facilitate CGIs owned and operated by GNI under the maximum connection model. A CGI will facilitate producers to truck biomethane via the road network. At the CGI, the trucks will be able to inject biomethane into the transmission network. In developing the proposals for CGIs, GNI considered the current treatment of RNG entry points and proposed changes to simplify those arrangements (eg one shipper at each entry point and Large Daily Metered (LDM) arrangements re capacity assignment) and better align them with their scale and nature. In addition, GNI proposed to align the treatment of RNG entry points and of CGIs.

Industry Consultation

GNI circulated its Proposal for Modification A118 to industry on 26th January 2026 together with:

- an explanatory memorandum,
- business rules, and;
- legal drafting.

The business rules were submitted to aid understanding on how the CGI would operate in practice and was not submitted for regulatory approval. The proposed modification was discussed at the Code Modification Forum and a workshop on them was also held on 11th March. The industry review period closed on 26th March. Submissions were received from 4 shippers, all of whom supported the changes. 2 shippers did raise questions relating to

notifications and capacity trades. GNI engaged with those parties and the CRU separately confirmed that the matters they had raised had been sufficiently addressed, which they confirmed they had been.

Brief Outline of the Code Modification and CRU Engagement

As shown in table 1 below, Code Modification A118 proposes changes to multiple parts of the Code of Operations.

Table 1 – parts of the code of operations being sought to be changed by A118.

Parts of the Code of Operations	Area
A	Definitions
C	Capacity
D	Nominations, Allocations and NDM Supply Point Reconciliation
E	Balancing Shrinkage
F	Administration
G	Technical
H	Operations
I	Legal and General

A detailed presentation was given – which is appended to this rationale – showing the proposed changes to the Code of Operations and the rationale for them. Two key aspects were to align the treatment of CGI facilities and RNG Entry points as well as ensuring that the processes were commensurate to the size and scale of these entry points. These drove GNI to propose changes, including that:

There would be One shipper per CGI Gas Point / RNG Entry Point: Each CGI Gas Point, or RNG Entry Point can only have one Shipper registered at a given time.

LDM arrangements are applied for the Assignment of Capacity: Existing provisions for LDM capacity assignment extended for use at both CGI Gas Points and RNG Entry Points

The details of the proposed changes are summarised in the presentation appended to this document and which was given at the workshop held on 11th March.

When GNI presented the proposals to the code modification forum the CRU requested GNI to, *inter alia*, clearly identify the rationale for the changes to align the treatment of the RNG entry points and that for a CGI facility. The CRU also queried its involvement in the Producer Services Agreement (PSAs) - a new agreement proposed to govern the relationship between each RNG Producer seeking to utilise the CGI Facility, and GNI in its role as CGI Facility Administrator. It was clarified that the CRU has no role in that agreement.

Reasons for the Approval of the Code Modification

The CRU is satisfied that Modification A118 will bring benefits through facilitating the injection of more biomethane into the gas network. The CRU notes that the changes were broadly supported by shippers with only two shippers raising queries during the industry review period held from January to March of this year. The provisions are aligned with the treatment of CGIs as described in the CRU's decision paper on the review of Biomethane Connections Policy, where users of the facility would be offered capacity on a firm,

evergreen, basis. The changes are based on sound objectives, such as avoiding undue discrimination between entry points and tailoring the processes to the scale of the entry points. In relation to the latter point the CRU notes that the current RNG arrangements are aligned with Large entry points such as Corrib and Moffat, which are multiple times larger than any RNG or CGI facility could ever practically be.

The first CGI facility owned and operated by GNI will be launched at Mitchelstown Co. Cork and it will be a first of a kind in Ireland. As such, the CRU has requested GNI to monitor the effectiveness of the arrangements introduced by this Code Modification, including those relating to the alignment of arrangements for RNG entry points and CGI facilities. Finally, the CRU would note that for CGIs, GNI will enter into PSAs with producers but that the CRU will have no role in those agreements.

Issue Date: 4th June 2026

Appendix A – presentation on Code Modification Proposals presented at a workshop on 11th March.



Moving Ireland's Energy

A118 Central Grid Injection & RNG Entry Point Arrangements

Code Mod Forum Workshop

11 March 2026



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

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 proposal outlined in A118 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 Code Modification proposal A118.

P5

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



CGI setup – worked example



GNI as the Transporter and GNI as the CGI Facility Administrator will establish a CSA / Statement of Terms – 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 CGI Facility Administrator – this will specify CGI Decanting Quantity, 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. **The same provisions will apply at RNG Entry Points.**

Shippers will be required to hold sufficient capacity for each CGI Gas Point in order to deliver gas to the Transportation System – usual overrun charges will apply.

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 apply at 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 apply at RNG Entry Points.**

Code of Operations – overview of Code Modification proposals

Part A – Definitions and Interpretation:	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. There will also be changes to existing definitions including the definition of RNG Delivery Facility. Definitions will not be specific to any one facility and common rules will be applied to all CGI Entry Points and RNG Entry Points throughout the Code where appropriate.
Part B – General Principles:	No Changes Proposed to Part B.
Part C – Capacity:	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.
Part D – Nominations, Allocations and NDM Supply Point Reconciliation:	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.
Part E – Balancing and Shrinkage:	No substantial changes envisaged; appropriate references to CGI Gas Points included where required.

Code of Operations – overview of Code Modification proposals



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.



Rationale for consistent treatment of CGI Gas Points and RNG Entry Points



Rationale for extending CGI rules to RNG Entry Points – Principles

Non-discrimination:

- GNI as the Transporter has an obligation of non-discrimination – GNI believe that having different rules between CGI users and Biomethane Direct Connections could be perceived as discriminatory.

Consistency:

- This was always one of the primary principles proposed by GNI, i.e. all CGI Gas Points within a CGI Entry Point, and RNG Entry Points will be subject to broadly equivalent provisions with respect to the Code, with consistent rules applied regarding Shipper arrangements.
- CGI Gas Points and RNG Entry Points both serve the same fundamental purpose of delivery of Renewable Natural Gas (RNG) to the Transportation System.

Simplicity:

- It is simpler and more efficient for Producers and Shippers if a single set of rules governs both – If different rules are applied to CGI Gas Points and RNG Entry Points, this will require dual systemisation at considerable additional cost.
- If CGI Gas Point and RNG Entry Point arrangements are not aligned, RNG Entry Point arrangements would be more in line with Corrib (x100 bigger) and not suitable for the scale of AD facilities.



What provisions are proposed to extend to CGI Gas Points and RNG Entry Points?



Key provisions:

- **One shipper per CGI Gas Point / RNG Entry Point:** Each CGI Gas Point, or RNG Entry Point can only have one Shipper registered at a given time.
- **Assignment of Capacity:** existing provisions for LDM capacity assignment extended for use at both CGI Gas Points and RNG Entry Points

Why does this make sense?

- Reduces complexity, and gives Shippers (and Producers) a clear line of sight for each of their CGI Gas Points / RNG Entry Points.
- Ensures consistent visibility of injection volumes (as per Connections Policy) and Green Certification which is common to both CGI Gas Points and RNG Entry Points.
- Avoids duplicating systems and processes, making implementation more efficient and cost-effective.
- Creates a uniform, straightforward framework for producers and shippers as the number of CGI Gas Points and RNG Entry Points grows.
- Allows Producers to change shipper regardless of current capacity bookings and allows outgoing shipper to dispose / assign capacity to incoming shipper – straightforward methodology in line with current provisions for LDM exit.

What current provisions are common to both CGI Gas Points and RNG Entry Points?



Key provisions:

- **Capacity:** Shippers at CGI Gas Points and RNG Entry points will book capacity as outlined in the Code already.
- **Nominations and Allocations:** nominations and allocations will work as prescribed in the Code currently.

Why does this make sense?

- The proposed changes ensure a consistent and streamlined approach across both CGI Gas Points and RNG Entry Points, using the existing Code rules for capacity booking and nominations.
- Capacity booking processes are not being fundamentally altered; current Entry Point provisions are simply being extended to CGI Gas Points.
- Nominations and allocations will continue to follow current Code practices, with only minimal adjustments – single prevailing nomination/allocation per shipper at each CGI Gas Point / RNG Entry Point to align with single shipper.
- Overall, the alignment maintains coherence with established processes, while ensuring both CGI Gas Points and RNG Entry Points operate under a common, straightforward framework.



Appendix 1: Detailed overview of key provisions proposed in A118



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 – 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 E, 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 CSA / Statement of Terms 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.



Appendix 2: Contractual overview



Key Contracts

Connected System Agreement (Statement of terms)		Producer Services Agreement	
Parties to the agreement	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. 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.	Parties to the agreement	The PSA governs the relationship between each RNG Producer seeking to utilise the CGI Facility, and GNI in its role as CGI Facility Administrator.
Scope	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.	Scope	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
Key Components	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.	Key Components	Under the terms of the PSA, the Producer will receive a right to decant a fixed volume of gas – decanting quantity. 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.