

Code Modification Forum
Wednesday, 10th of June, 2026
GNI Innovation Centre, Brownsbarn
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>	15	10:40 - 10:55
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	10:55 - 11:00
5.	<i>Code Modification Proposal A117 - Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements</i>	5	11:00 - 11:05
6.	<i>Code Modification Proposal A118 - Central Grid Injection and RNG Entry Point arrangements</i>	5	11:05 - 11:10
7.	<i>Status of Code Modification Proposals</i>	5	11:10 - 11:15
8.	<i>GNI update on EU Affairs and National Policy</i>	15	11:15 - 11:30
9.	<i>GNI presentation on the Network Development Plan</i>	25	11:30 - 11:55
10.	<i>GNI presentation on PAYG Project</i>	15	11:55 - 12:10
11.	<i>GNI presentation on the Emergency Section of the Code of Operations</i>	10	12:10 - 12:20
12.	<i>AOB Items / Next Meeting / Close of the CMF</i>	5	12:20 - 12:25

Join:

<https://teams.microsoft.com/meet/37434405165475?p=lkpRkEHfQJv6gmPFfi>

Meeting ID: 374 344 051 654 75

Passcode: u7Kb9oq6



Gas
Networks
Ireland

Code Modification Forum

Minutes of Hybrid Meeting

10 June 2026



1. Introduction

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

2. Standing Items

2.1 Approval of Minutes

Draft CMF Minutes from the 22nd of April, were issued on the 28th of May. There were no comments at the meeting and the Minutes were adopted.

2.2 Review of actions from last meeting

The Transporter provided an update on the three open action items from the previous meeting:

In relation to Action Item A099, the Transporter confirmed that it is continuing to engage with the Regulator and intends to share further details in the coming weeks.

Regarding Action Item C587, which was originally opened in October 2023 and subsequently reopened at the previous meeting, the Transporter confirmed that the review is progressing and noted that further information would be provided later in the meeting by Kieran Quill.

In relation to the action concerning engagement with industry on planned maintenance, the Transporter advised that further information would be provided later in the meeting by James O'Keeffe.

2.3 GNI Scheduled Maintenance Update

James O'Keeffe, Southern Regional Operations Manager at the Transporter, presented an update on scheduled maintenance, referring to slides 8 – 11.

The Transporter outlined that maintenance works between Carrickfergus and Coolkeeragh are required to be completed before July. It was noted that the Transporter is engaging with industry stakeholders to identify a suitable timeframe for these works.

The Transporter further advised that pigging activities are scheduled to take place on 17 May 2027.

In response to the presentation, the Regulator queried whether, based on the analysis undertaken, the North-South Pipeline would be required. The Transporter confirmed that this is not required, noting that in the absence of flow there would be no requirement for pigging.

The Transporter also noted that further detail is available in the slides and James provided his email (James.O'Keeffe@gasnetworks.ie) and noted that shippers can contact him directly with any questions.

3. Code Modification Proposals

3.1 Code Modification Proposal A111 - Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network

Conor Murphy, Wholesale Market Analyst at the Transporter provided an update on Code Modification Proposal A111, referring to slides 12 – 13.

It was noted that the **Instruction** and associated **Rationale** issued on 5 June 2026.

In response to the update, the Regulator emphasised the importance of gas quality and highlighted the continued significance of the Code Modification Forum as a key platform for engagement on such matters.

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

Stephen O’Riordan, Wholesale Market Manager at the Transporter provided an update on Code Modification Proposal A117, referring to slides 14 – 15.

The Transporter confirmed that the proposal remains under CRU review. It was noted that the Instruction and Rationale documentation has been prepared and is currently undergoing final checks.

The Transporter further advised that the Instruction/Rationale is expected to issue shortly, following final engagement with the Regulator’s retail team.

3.3 Code Modification Proposal A118 - Central Grid Injection and RNG Entry Point arrangements

Stephen O’Riordan, Wholesale Market Manager at the Transporter provided an update on Code Modification Proposal A118, referring to slides 16 – 17.

It was noted that the **Instruction** and associated **Rationale** has issued. The proposal, which was launched in January 2026, seeks to introduce arrangements applicable to Central Grid Injection and RNG Entry Points on the transmission system.

The Transporter outlined that several industry workshops have taken place in relation to the proposal and that a number of submissions were received from industry stakeholders.

The Transporter acknowledged and thanked stakeholders and the Regulator for their engagement and input throughout the process.

The Regulator further noted that a consultation on this topic was published in November and advised that additional measures to support biomethane development are expected to be announced in the coming days.

3.4 Status of Code Modification Proposals

The status of Code Modification Proposals was taken as read, having been addressed as part of the preceding discussions under each individual proposal.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A009	CNG Supply Point Capacity Setting	In abeyance	Transporter engaging with CRU. Further details to be provided.	TBC	Ongoing engagement with CRU
A111	Amendment to Code of Operations to increase oxygen limit for biomethane entry points on the transmission network	Complete	Decision rationale issued 5 June 2026. Oxygen limit increased from 0.2% to 0.5%.	10/06/2026	Instruction issued on 04/06/2026
A117	Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements	CRU Review	Decision rationale prepared and undergoing final checks following engagement with CRU Retail.	TBC	Issue of Instruction from CRU
A118	Central Grid Injection and RNG Entry Point arrangements	Complete	Decision rationale issued following CRU Review.	10/06/26	Instruction issued on 04/06/2026

4. Other Agenda Items

4.1 GNI update on EU Affairs and National Policy

Tom Lyons, EU Affairs and Policy Manager, and Sean McAuliffe, Policy Manager at the Transporter, presented an update on EU Affairs and National Policy, referring to slides 20 – 23.

During the discussion, a query was raised in relation to whether there is any indication that the EU position on Renewable Heat Obligation (RHO) requirements may change.

A further query was raised regarding the level of certainty associated with RHO arrangements beyond 2030.

The Transporter referenced subsequent written responses circulated to stakeholders, which addressed a number of related queries at a high level.

In relation to the potential impact of UK transition issues on the timeline for RHO legislation, a query was raised, and it was confirmed that DCEE is engaging with the European Commission on this matter. However, it is not expected to delay the introduction of the legislation. It was further noted that the priority is to progress the enabling legislation, with the option to amend it at a later stage if required.

Regarding RHO obligation rates for 2030, a query was raised, and it was confirmed that these have not yet been determined. A review of the scheme will take place after year two, at which point post-year three obligation rates will be set based on an assessment of fuel availability.

In response to a query on the assumptions underpinning the SEAI heat study, it was noted that the study assumes that the 5.7 TWh biomethane target will be achieved, although not all of this volume is expected to be used within the heat sector.

4.2 GNI presentation on the Network Development Plan

Siobhán O'Halloran, Future Networks Manager at the Transporter, presented an update on the Network Development Plan, referring to slides 24 – 35.

During the discussion, the Regulator queried whether the CO₂ emissions referenced are directly related to the network. The Transporter provided clarification in response.

A query was raised regarding switching frequency under the Gas Pathways Programme (GPP) and how this compares to the previous year.

A further query was raised in relation to clarity on the biomethane strategy and associated challenges (GCB/ECB). In response, the Transporter acknowledged that this had been an area of concern and confirmed that work has been undertaken over the past year to address these issues.

4.3 GNI presentation on PAYG Project

Colm O'Duibhir, Regulatory Operations Manager at the Transporter, presented an update on the PAYG Project, referring to slides 36 – 48.

In response to the presentation, the Regulator noted that the proposal represents a fundamental shift in the market and commented that the governance arrangements appear to be well developed. A query was raised regarding whether the PAYG Working Group (under GMARG) will be responsible for drafting the Code Modification Proposal, and whether this will have prior endorsement from GMARG. The Transporter confirmed that the proposal will be reviewed and approved through GMARG in advance.

A further query was raised regarding whether PAYG arrangements are intended to address financial hardship or reflect a broader change in customer preferences (CRU). In response, the Transporter advised that the initiative is broader in scope and noted that approximately 100,000 meters are currently in operation. It was further noted that all suppliers with residential customers are represented on the Working Group.

A query was also raised in relation to the project timeline, noting that the initiative had not been identified as a priority earlier in the year and seeking clarification on the drivers behind the November deadline (CRU). The Transporter advised that the timeline reflects the need to ensure a full understanding of the framework within which the system will operate and confirmed that further detail will be provided in due course.

4.4 GNI presentation on the Emergency Section of the Code of Operations

Kieran Quill, Senior Market Analyst at the Transporter, presented an update on the Transporters review of Emergency Section of the Code of Operations, referring to slides 49 – 53.

The Transporter advised that a draft report has been prepared, on which the presentation is based, and confirmed that this will be submitted to the Regulator in advance of the next CMF.

A number of queries and observations were raised during the discussion. A shipper representative noted their appreciation for the work undertaken by the Transporter on this topic and expressed support for the progress made.

A query was raised regarding whether the UK mechanism is linked to a tendering process.

The Regulator queried whether the proposal constitutes a formal policy submission to the CRU. In response, the Transporter advised that it is seeking guidance from the Regulator on the appropriate approach and noted that the CMF may provide a potential pathway for further development.

The Regulator noted that this item is not currently included in its work plan for the year and highlighted that resource considerations will need to be assessed should the work progress further.

A shipper representative emphasised that the topic is relevant to the CMF, given that it relates to the Code of Operations rather than broader security of supply considerations, and called for further discussion at the next meeting .

In response to a query on whether any comparable mechanisms have been implemented in the EU, the Transporter confirmed that it is not aware of any such mechanisms currently in place.

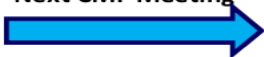
5. AOB Items / Next Meeting / Close of the CMF

Stephen O’Riordan, Wholesale Market Manager at the Transporter, provided an update on bi-directional capacity exemptions, referring to slides 55 – 58.

The Transporter thanked the team for their work in organising and delivering the event. In particular, he acknowledged the contributions of the Innovation Manager, the Stakeholder Manager, and Evergreen in facilitating the stakeholder visit and tour.

The Transporter confirmed the date of the next CMF meeting. There being no further business, the meeting was then closed.

Upcoming Meetings

Next CMF Meeting 

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

List of Attendees

Name	Organisation
Stephen O'Riordan	GNI
Kieran Quill	GNI
Conor Murphy	GNI
Stephen Pigott	ESB
Derek Peyton	Bord Gais Energy
Anthony Foody	ESB
Martin Regan	Marex
Peter Erwin	Energia
David Grindle	Yuno Energy
Raymond O'Malley	Electric Ireland
DJ Kiely	Flogas
Barry Murphy	Flogas Ireland
Brian McGlinchey	Vermilion
Ben Smithies	Go Power
Paddy Fitzgerald	BGE
Chris McCartney	GMO NI
David Morgan	CRU
Seán Mac an Bhaird	CRU
Adam Williams	Nephin Energy
Johnny Fingleton	Fingleton White
Oluyori Benjamin	CRU
Diego Hormazábal	Flogas Enterprise Solutions
James O'Keeffe	GNI
Chris Ward	Manx Utilities
Colm O'Duibhir	GNI
Harry Molloy	Epuki
Nicolai Albrecht	Epuki
Stephen English	GMO NI
Paul Crowley	GNI
Claire Walsh	Centrica

Tom Lyons	GNI
Sean McAuliffe	GNI
Jamie Twomey	GNI
Siobhan O'Halloran	GNI





Code Modification Forum – Hybrid Meeting

Wednesday, 10th of June

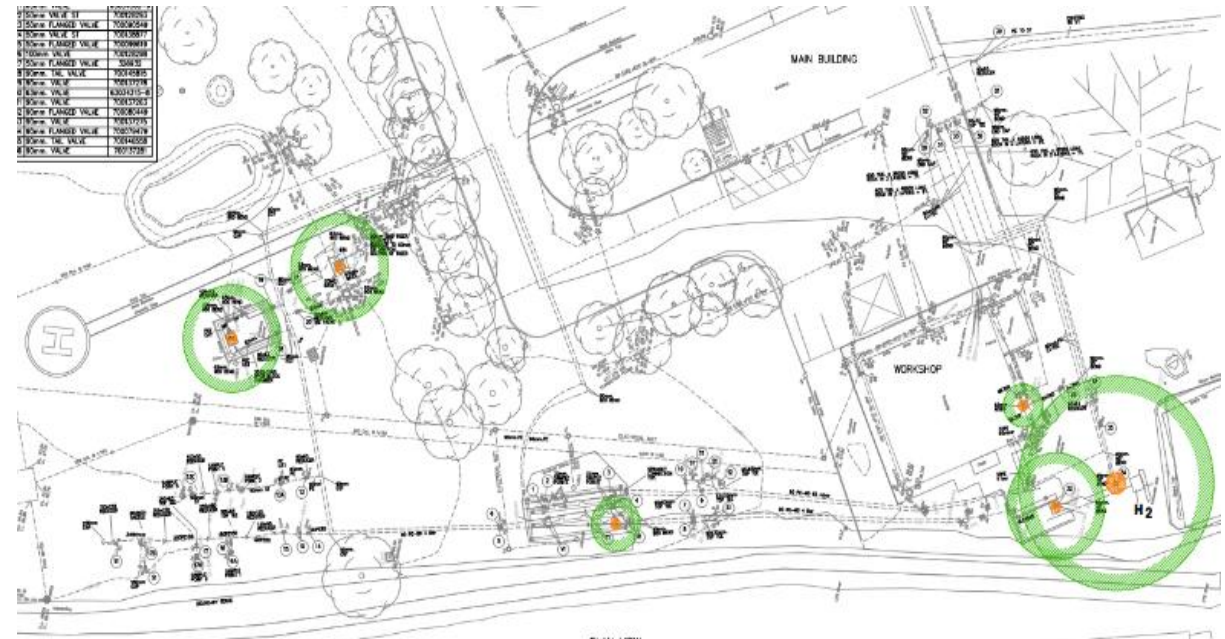
Agenda

- | | |
|----------------------------------|------------------|
| • Tea & Coffee: Lab | 9:30am |
| • Code Modification Forum | 10:30 to 12:30pm |
| • Lunch | 12:30pm |

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|--|----------------|
| Gas Networks Ireland Interactive Session | 1:00 to 2:10pm |
| • Welcome (Christina Van der Kamp) | 1:00 to 1:05pm |
| • Biomethane Overview (Padraig Fleming) | 1:05 to 1:15pm |
| • Hydrogen Overview (Brian Mullins) | 1:15 to 1:25pm |
| • Strategic Network Planning (Siobhán O'Halloran) | 1:25 to 1:35pm |
| • Price Control 6 (Tim Gugov) | 1:35 to 1:45pm |
| • Panel Discussion / Q & A | 1:45 to 2:10pm |
| • Network Innovation Centre Tour / Evergreen Overview (Ita Ryan, Padraig Fleming) | 2:10 to 2:30pm |
| • Evergreen AD Tour | 2:45 to 4:15pm |
| • Stakeholder Reception | 5:00pm |

Welcome to the Network Innovation Centre

- No smoking, vaping campus. Smoking area in front of main building door only
- All exits are marked clearly
- No alarms due, if you hear an alarm go calmly and swiftly to the main entrance gate
- Sign in as a visitor or the sign in sheet (host will arrange)
- Bathrooms are only in main building use the back door to gain entrance
- If you need to make a phone call please do so within the buildings or the tarmac between the buildings
- No entrance into locked areas or around the campus without a host
- Your host must know where you are at all times



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 A117 - Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements
6. Code Modification Proposal A118 - Central Grid Injection and RNG Entry Point arrangements
7. Status of Code Modification Proposals
8. GNI update on EU Affairs and National Policy
9. GNI presentation on the Network Development Plan
10. GNI presentation on PAYG Project
11. GNI Presentation on Emergency Section of the Code of Operations
12. GNI AOB Items / Next Meeting / Close of the CMF

1. Review of minutes from last meeting

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- Draft minutes from the CMF on April 22nd were issued on the 28th of May.



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2. Review of Open Actions

2. Review of open actions

ID	Action	Responsibility	Date Raised	Status
C575	Transporter to furnish required data to CRU in connection with tariff review in relation to Supply Point Capacity Settings	Transporter/ CRU	25/03/2020	Ongoing
C587	Transporter to commence review of the Emergency Section of the Code of Operations	Transporter	18/10/2023 & 22/04/2026	Ongoing
C610	The Transporter to engage with industry on upcoming planned maintenance through a survey or by inviting questions from shippers	Transporter	22/04/2026	Ongoing



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3. Maintenance Days

James O'Keefe – Southern Regional Operations Manager

IN-LINE INSPECTION 2027

PL No.	Name	Dia (mm)	Length (km)	Date
91	Carrigfergus to Coolkerragh	450	112	17 th – 21 st May 2027

- Pipeline 91 is a ~112 km, 450 mm, high-pressure (75 bar) transmission pipeline connecting the Belfast transmission system at Carrickfergus to Coolkeeragh Power Station, providing critical gas supply to North West Northern Ireland and enabling regional distribution and future network expansion. Inline Inspection is due in 2027 for this pipeline which has a current RBI frequency of 15 years. It was last pigged in 2012, and ILI is a code requirement under IGEM/TD/01. The inspection tools are booked for the dates outlined in the above table.
- The in-line inspection of a pipeline that has been previously pigged is made up of 3 pig runs:
 - Gauge Pig
 - Cleaning Pig
 - Intelligent Pig
- Based on network analysis it is feasible to pig the line for a **maximum** and **average** demand day as velocities are within the required 0.5m/s - 5m/s range, Coolkeeragh must be in operation.

- There will be 1No. pig run per day with a contingency of 2 days for extra cleaning runs if required. Should the intelligent pig not collect sufficient data, a re-run may be required for an extra day on the following week.
- **NOTE : In relation to PL36 Ballough to Skibbolmore, following Network Analysis, there will be no requirement to flow up the South North Pipeline, therefore no shipper disruption.**

Demand	Coolkeeragh Average Flows (kscmh)	Pipe Length (km)	Pig Run Time		
			Min	Max	Avg
Average Day (21.53 GWh/day)	55.25	112	13 hrs	16.5 hrs	15.5 hrs
Max Day (38.31 GWh/day)	67.36	112	6.5 hrs	11.5 hrs	10 hrs

- Pipeline 77, the Dublin-Galway-Limerick transmission pipeline (referred to as Pipeline To The West) runs from Gormanstown in Co. Meath to Goat Island in Co. Limerick, via Baldrumman in Co. Dublin. It will be upgraded to operate to its full design pressure of 85 bar, compared to the current 70 bar. The uprating is required to ensure sufficient gas pressure and capacity for customers in the Southern Region Network; and to ensure more gas can be moved through the pipe to avoid the risk of potential capacity constraints, particularly for Cork as the furthestmost point of the network.
- Equally important, this critical infrastructure project will ensure that the gas system can continue to meet customer demand on what is known as a 1-in-50 year winter day peak. It is important to note the following:
 - Corrib flows **will not** be curtailed.
 - Corrib **will be required** to operate at higher pressures i.e. push harder.
 - Awaiting a Technical Note from Network Analysis RE flows / pressures i.e. the finer detail.
- **GNI Maintenance work plans on the Corrib pipeline will be co-ordinated as usual with the Ballanaboy Operator planned shutdowns to remove any flow interruption consequences.**
- Any questions please contact: **james.okeeffe@gasnetworks.ie**

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4. Code Modification Proposal A111

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

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



Issued and circulated on 15 June 2023

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

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

Update

- Upper limit for oxygen is 0.2% for natural gas in Transmission and Distribution Networks
- RNG injected into the distribution network has upper limit of 1%
- Industry review date concluded 1 October 2024.
- Industry submissions to date can be accessed on slides 42 and 43 on the following [Slide Deck](#).
- **Next Steps:** The [Instruction](#) & [Rationale](#) issued 8 June 2026.

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	Instruction & Rationale issued	NA	NA	NA

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

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5. Code Modification Proposal A117

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

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

Issued and circulated on 19 August 2025

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

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

Update:

- The Transporter furnished the Regulator with the Code Modification Proposal Report for Proposal A117 on the 10 March 2026. The Proposal is now in CRU Review.

Next Steps:

Next steps to be determined by CRU followings its review.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A117	Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements	CRU Review	The Industry Review period has ended and the Transporter has furnished the Regulator with the Proposal Report.	09/09/2026*	CRU Determination

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

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6. Code Modification Proposal A118

Central Grid Injection and RNG Entry Point arrangements

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

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

Update:

- GNI held an Industry Workshop / Q&A session on Wednesday 11 March with the [Minutes](#) and [Slides](#) issued on the 24 March 2026. The Proposal is now in CRU Review; GNI has provided report with the Code Mod Proposal Report including all industry written submissions.

Next Step:

- The [Instruction](#) & [Rationale](#) issued 8 June 2026.

ID	Title	Status	Reason for Status	Status End Date	Next Step
A118	Central Grid Injection and RNG Entry Point arrangements	Instruction & Rationale issued	NA	NA	NA

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

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7. Status of Code Modification Proposals

7. 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	Instruction & Rationale issued	NA	NA	NA
A117	Modification to the Code of Operations Supplier of Last Resort (SoLR) arrangements	CRU Review	The Industry Review period has ended and the Transporter has furnished the Regulator with the Proposal Report.	09/09/2026*	CRU Determination
A118	Central Grid Injection and RNG Entry Point arrangements	Instruction & Rationale issued	NA	NA	NA

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

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8. GNI presentation on EU Affairs and National Policy

Tom Lyons – European Affairs & Policy Manager

Sean McAullife – National Policy Manager

Policy / Regulatory Update

EU Gas & Hydrogen Market Package (GHP)

- DCEE are advanced on drafting the **Hydrogen Bill** (primary legislation) with a view to sending for legislative scrutiny in coming months.
- DCEE will produce further secondary legislation via statutory instruments to update Irish law to cater for areas including network planning, and relevant retail market operations (eg consumer rights and responsibilities).

European Commission Initiatives

- **EU Grids Package:** Proposed legislation will introduce a series of measures to impact network planning, financing and permitting among others. Preparations continue at EU Council and Parliament in establishing formal negotiation positions on the legislation. The EU Parliament's draft negotiating position has been published with further revisions expected during the summer.
- **Connecting Europe Facility:** Proposed legislation introduced by EU Commission in July 2025. Overall budget proposed as €81.4 bn for 2028-2034 , with €29.9bn set aside for energy infrastructure. EU Parliament Transport and Energy Committees are reviewing the proposed legislation and are in the process of proposing amendments (78 amends tabled to date, more expected). EP will formally approve its position and proposed amendments to the legislation in October.
- **Citizen's Energy Package:** Published on March 10 - Empowering consumers through electrification, flexibility, stronger consumer protection and better implementation of *existing EU energy laws*. No new primary legislation proposed; instead, implementation shifts to guidance, secondary acts and Member State action, with a clear sequencing set out by the Commission.
- **EU Energy Security Framework** (Now expected **Q4**) Anticipated to propose amendments to the 2017 gas security of supply regulation and will likely impact national risk assessments (N-1) process, joint electricity-gas crisis planning and modelling. This follows a comprehensive EU energy security fitness check consultation held in 2024 and a call for evidence conducted in 2025.
- **Accelerate EU – Energy Union:** Published on April 22 - Emergency measures in response to the sharp rise in energy costs linked to energy crisis; temporary support for households and industry; accelerated demand reduction and electrification.

EU Council Presidency – July 1st – December 31st

- Ireland programme expected to focus on three key principles: **Competitiveness, Values** and **Security**
- Key energy legislative files under scrutiny: EU Grids Package (incl. TEN-E Regulation Review); Energy Security Framework

Policy / Regulatory Update

Ireland's National Biomethane Strategy / Renewable Heat Obligation

- GNI continues to engage with the CRU on biomethane-related matters, including the Mitchelstown CGI and arrangements for biomethane injection to the network.
- DCEE continues to engage with the EC to assess the impact on the RHO of the EU TRIS decision. The Renewable Heat Obligation Bill is included in the Summer 2026 Oireachtas Legislation Program. GNI will continue to engage with DCEE on the topic.

Large Energy User Connections

- The CRU is preparing to publish a consultation on interruptible gas capacity products, as per the Large Energy Users (LEU) connections policy decision.
- DETE's Large Energy User Action Plan (LEAP) was published on 13th January 2026, setting out a plan-led framework for large energy user demand, including green energy parks. GNI continues to engage with DETE on the implementation of the Plan.

Energy Security in Ireland to 2030

- GNI are progressing the development of a state-led strategic gas emergency reserve, with Cahiracon, Co. Clare selected as the site location, with SGER-related legislation included in the Summer 2026 Oireachtas Legislation Programme.
- GNI and DCEE are progressing engagement on other actions under the Energy Security Package, including Actions 17, 22 and 24.
- The National Maritime Security Strategy was published on 25 February 2026 and includes references to the protection of critical infrastructure, including gas interconnectors, with a Critical Undersea Infrastructure industry network being established by the Department of Defence, with GNI to be included.

Ireland's National Hydrogen Strategy

- The National Hydrogen Programme Taskforce held its second meeting in March 2026, with GNI represented. Steady progress being made across several actions.
- Transposition of the Gas and Hydrogen Package is progressing well and expected by end of year.

SEAI's Comprehensive Assessment of the Potential for Efficient Heating and Cooling in Ireland (2026)

- The SEAI published a "Comprehensive Assessment of the Potential for Efficient Heating and Cooling in Ireland" in May 2026, setting out analysis of future heat demand and technology options across residential, commercial and industrial sectors.
- The study includes scenarios for future energy use in heating, which indicate a continued role for low carbon gases, including biomethane and hydrogen, alongside electrification pathways

Upcoming energy and climate policy developments

- **RHO Bill** is included in the Oireachtas **Summer Legislation Programme**.
- **SGER Bill** is included in the Oireachtas **Summer Legislation Programme**.
- **Interruptible Gas Capacity** consultation expected to be published by CRU shortly.
- The Department of Energy Security and Net Zero (DESNZ) decision on **hydrogen blending into the GB gas transmission network** is awaited.
- DESNZ aims to publish its response to its consultation **Gas System in Transition: Security of Supply** in **Q2 2026**.
- **EU Energy Security Framework** legislative proposals expected **in Q4**.

Recent consultations

- **CRU: Review of the Supplier of Last Resort Framework**.
- **Regional Assemblies: Regional Spatial and Economic Strategies (RSES)**.
- **EirGrid: All-Island Resource Adequacy Assessment 2027-2036**.
- **Uisce Eireann: Draft National Bioresources Strategy**: 22 July.
- **CRU: Harmonised Transmission Tariff Methodology for Gas**: 15 July.
- **ACER: Amendments to the gas network code on interoperability and data exchange**.
- **EC: Industrial Accelerator Act - speeding up decarbonisation**.
- **GHGP: GHG Protocol Actions and Market Instruments**: 15 June.
- **ACER: UIC Survey for Methane Emissions Regulation**: 30 June.
- **EC: EU rules on alternative fuels infrastructure**: 03 August.

Moving Ireland's Energy

9. GNI presentation on the Network Development Plan 2025 (Draft)

Siobhán O'Halloran – Future Networks Manager

Executive Summary - 10-year Outlook (to 2035)

What the Network Development Plan does

- Assesses system capacity and security of supply over a 10-year horizon (licence requirement).
- Covers the period to 2034/35, reflecting updated policy, market and electricity system assumptions.

Key outcomes by 2034/35 (Best Estimate Scenario)

- **26%** reduction in annual system gas demand.
- **1%** increase in peak day demand (1-in-50 severe winter).
- **76%** of gas supply from Moffat, **15%** from Biomethane, **9%** Corrib.
- **40%** decrease in total gas network carbon emissions by 2034.

System Impacts and Implications

- Projections for residential disconnections have significantly reduced from NDP 2024 to NDP 2025.
- Sensitivity analysis identifies the emerging need for additional entry capacity in early 2030s.

Annual Gas Demand Forecast by Sector

- **Powergen:**

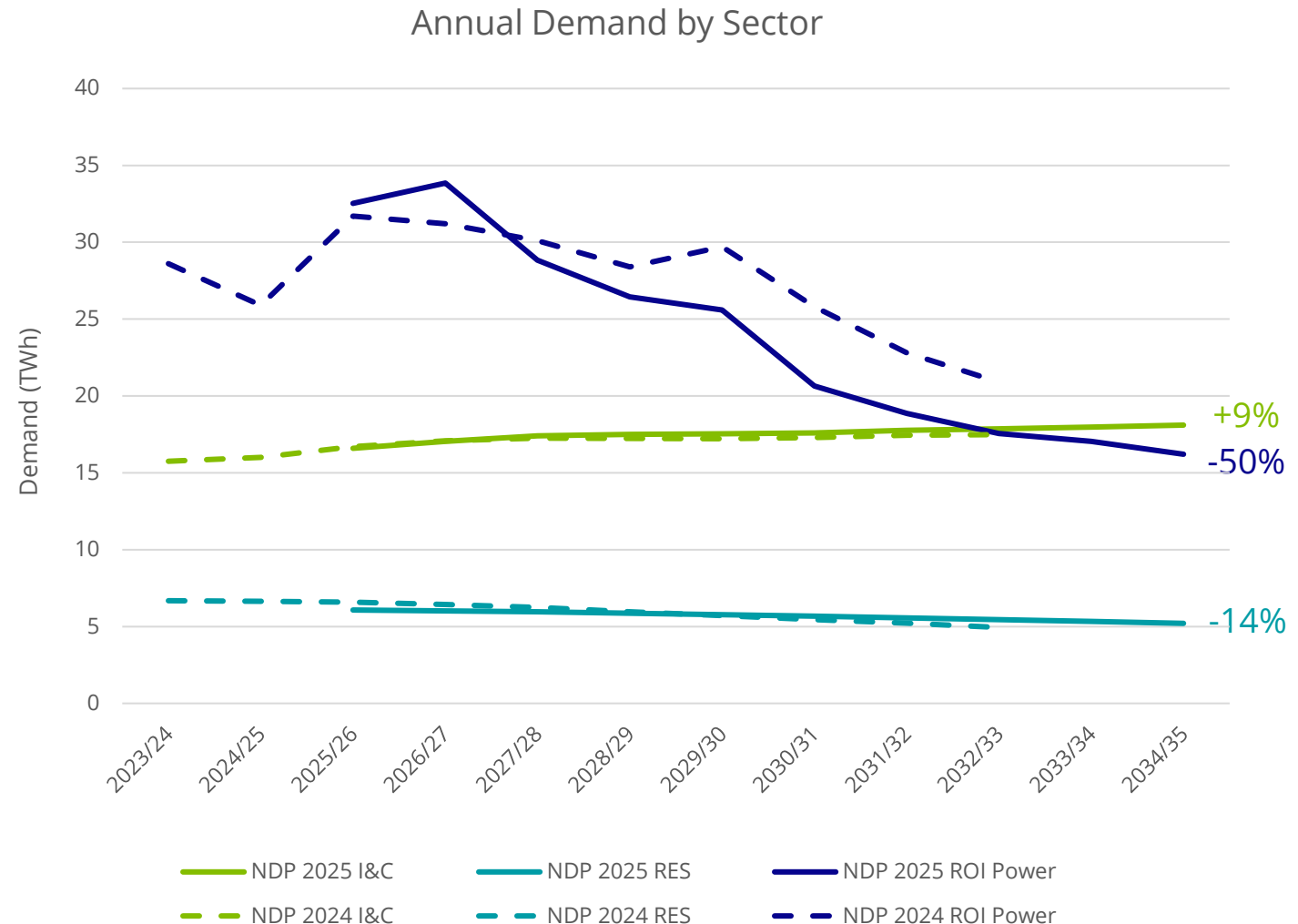
- Annual demand up in the short-term due to non-gas thermal generator delivery delays
- Decreasing in the longer term due to increasing electrical interconnection/imports and renewable generation build out

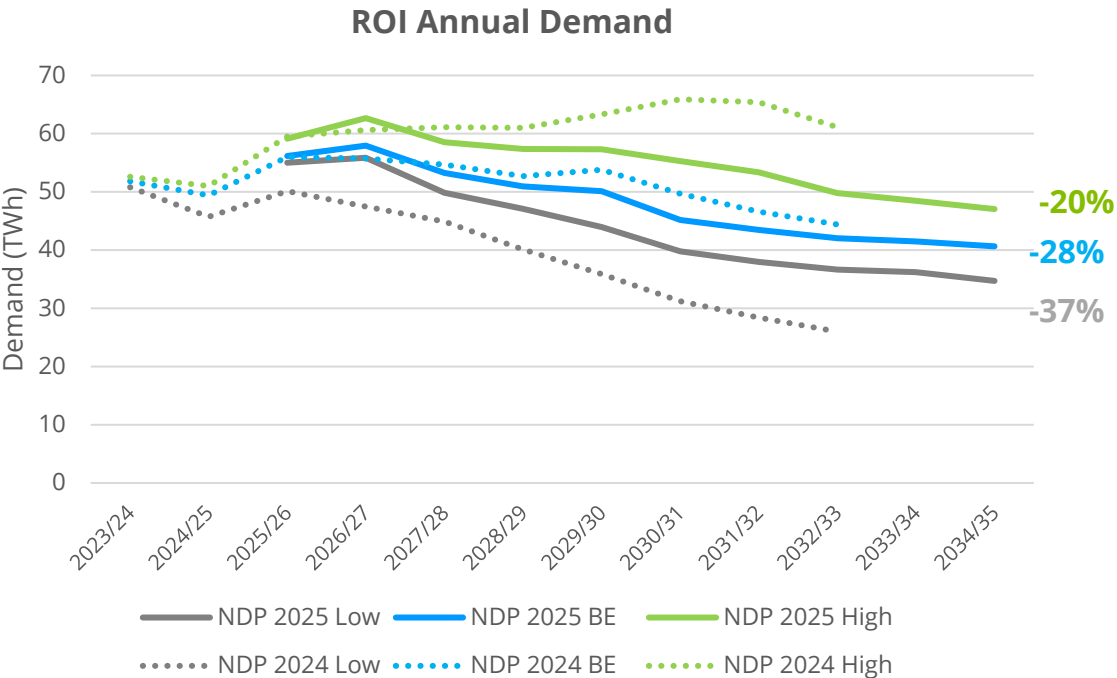
- **Industrial & Commercial:**

- No uncontracted data centres in the Best Estimate for NDP 2025

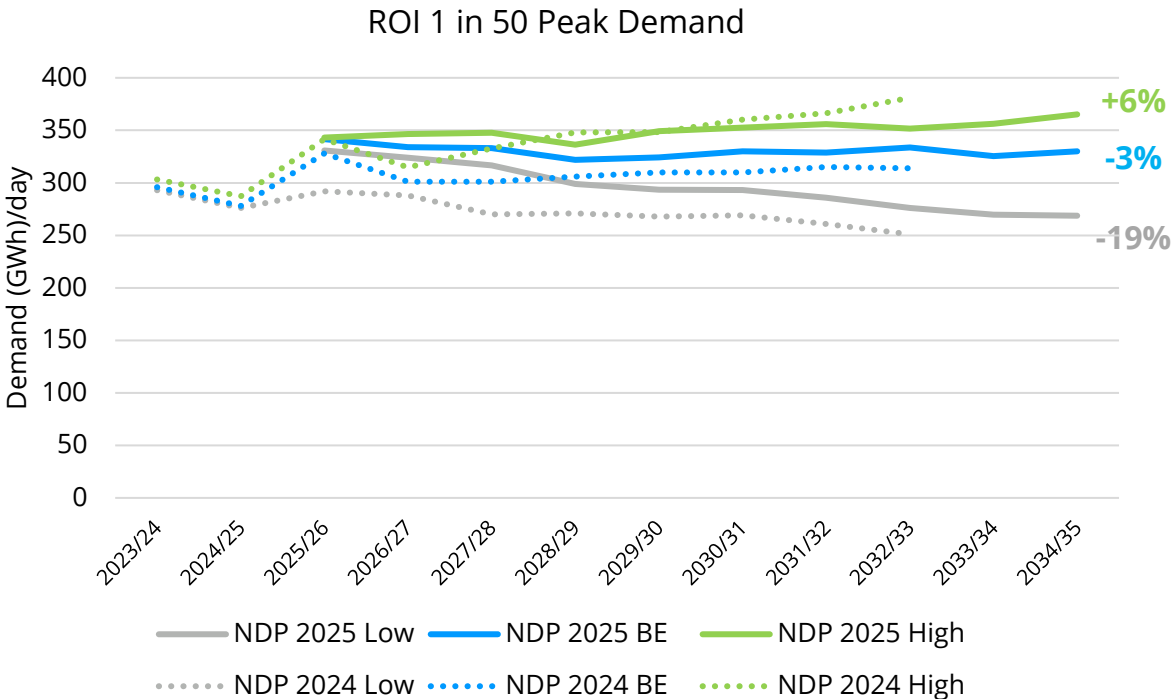
- **Residential:**

- Lower starting point as average residential usage has decreased
- The number of gas disconnections has been significantly tempered compared to NDP 2024 in line with revised SEAI projections



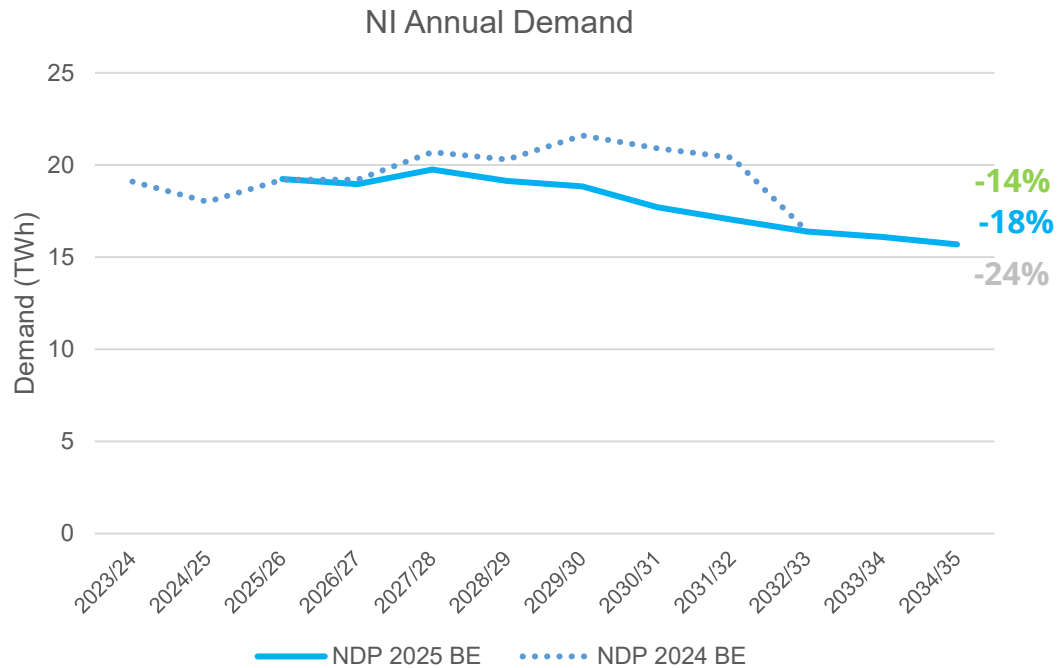


- **Best Estimate Annual Gas Demand 2025/26 vs. 2034/35:**
 - Total ROI gas demand: -28%
 - Power Generation: -50%
 - Industrial & Commercial: +9%
 - Residential: -14%



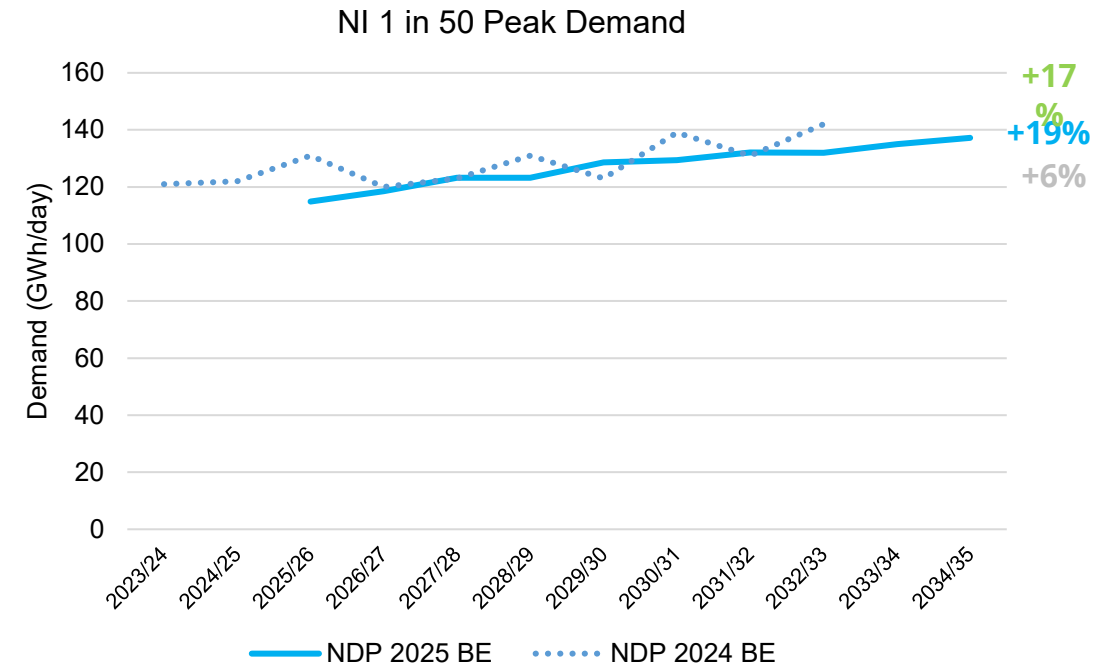
- **Peak Day Demand 2025/26 vs. 2034/35:**
 - Severe winter (1-in-50) BE: -3%
 - Severe winter (1-in-50) High: +6%
 - Severe winter (1-in-50) Low: -19%

NI Forecast demand



- **Best Estimate Annual Gas Demand:**

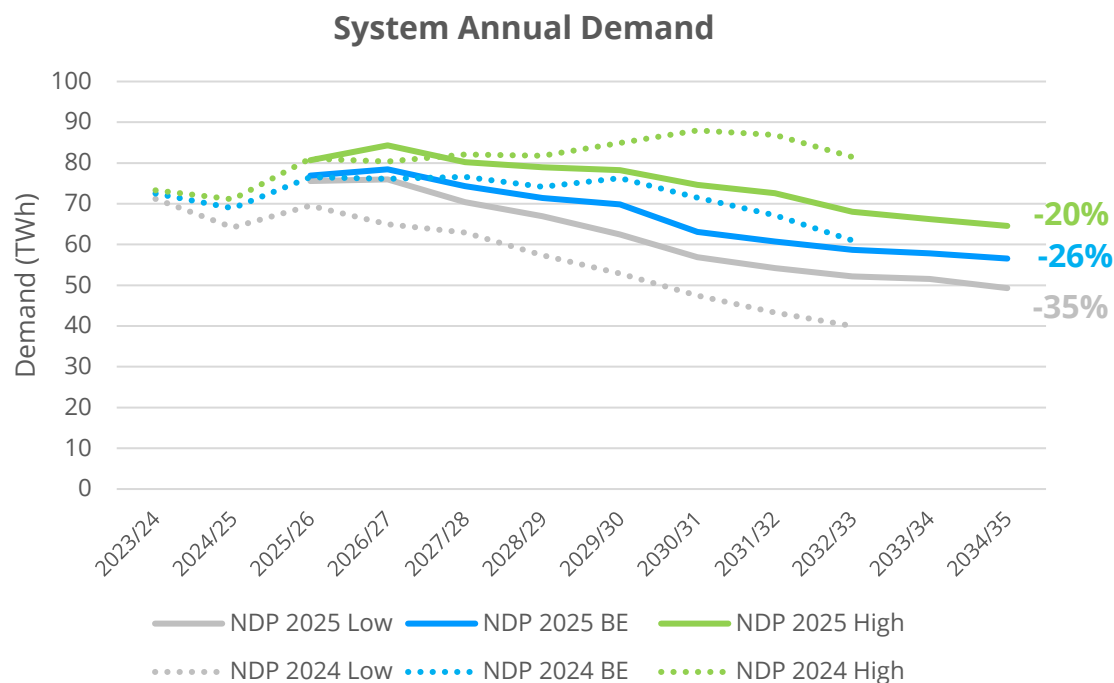
- NI gas demand: **-18%**
 - NI power gas demand: **-42%**
 - NI non-power gas demand: **+17%**



- **Peak Day Demand 2025/26 vs. 2034/35:**

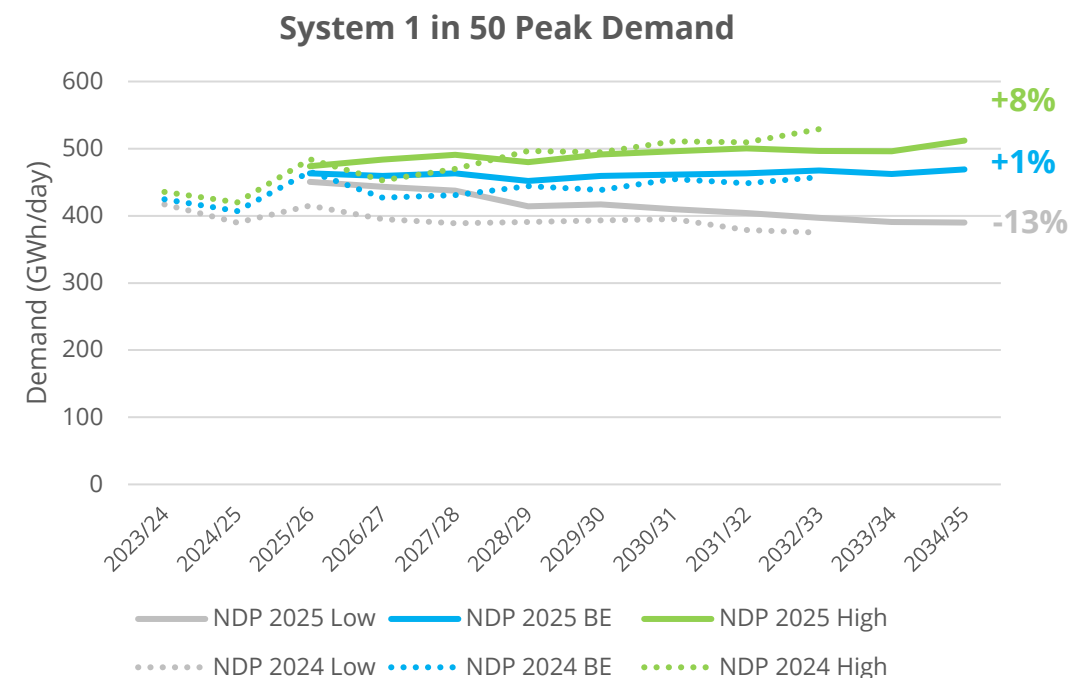
- Severe winter (1-in-50): **+19%**

NDP System* Demand Forecasts



Best Estimate System Annual Gas Demand 2025/26 vs. 2034/35:

- Total System gas demand: -26%
 - ROI gas demand: -28%
 - NI gas demand: -18%



System Peak Day Demand 2025/26 vs. 2034/35:

- Severe winter (1-in-50) Best Estimate: +1%
- Severe winter (1-in-50) High: +8%
- Severe winter (1-in-50) Low: -13%

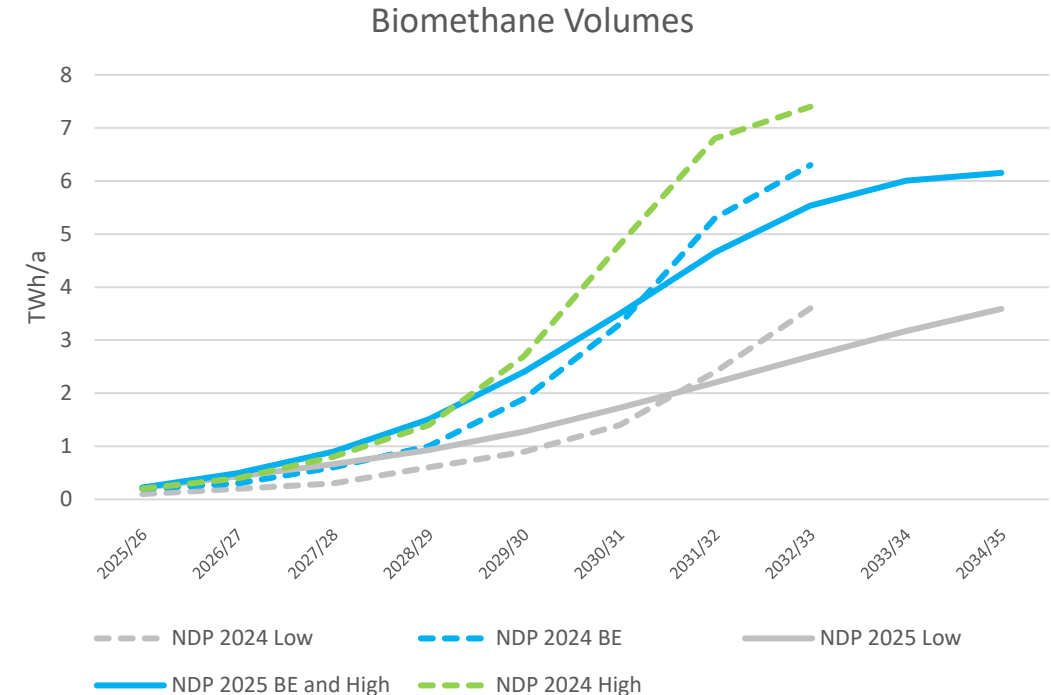
Biomethane and Hydrogen

■ Biomethane

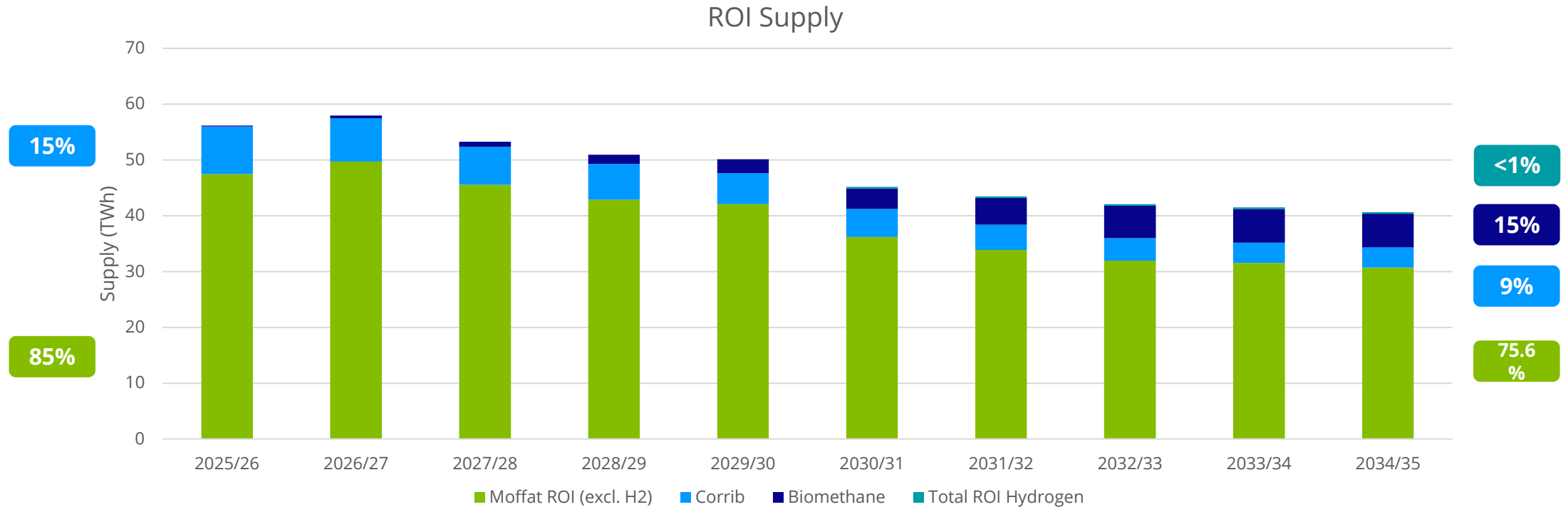
- Biomethane target = 5.7 TWh NCV = 6.3TWh GCV by 2030
- Biomethane supply is at 3 TWh in 2030
- Latest projection almost reaches 6.3 TWh supply volume in the NDP period (6.2 TWh in 34/35)

■ Hydrogen

- In-Network Blends - maintaining the position of last year of 2% blends by volume through Moffat from gas year 2029/30
- The 5 GW offshore wind target has slipped from 2030 to “early 2030s,” signaling overall delays, and the extra 2 GW previously earmarked for hydrogen is unlikely before 2035.
- Any indigenous networked 100% hydrogen before 2035 is assumed to be on isolated H2 networks and is therefore not included in the NDP period.



ROI Supply Outlook - Annual

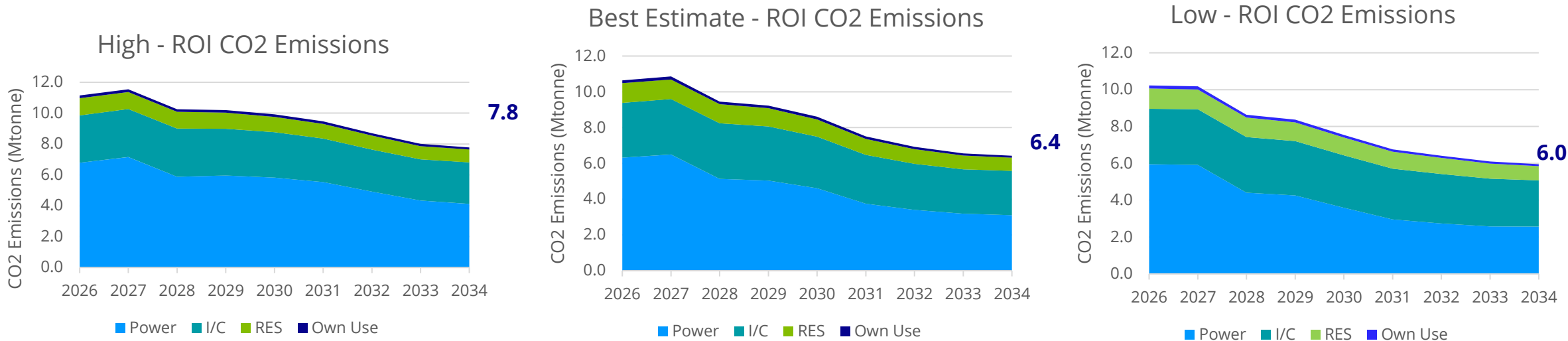


- **By 2034/35:**
 - **Natural gas imports** from GB via Moffat are expected to account for **76.2%** of gas supply to ROI
 - **Hydrogen** is anticipated to account for **0.7%** of ROI demand via blends from the UK
 - **Corrib** is forecast to supply **9%** of ROI demand
 - **Biomethane** is expected to account for the remaining **15%** of ROI supply

Total Gas Network CO₂ Emissions

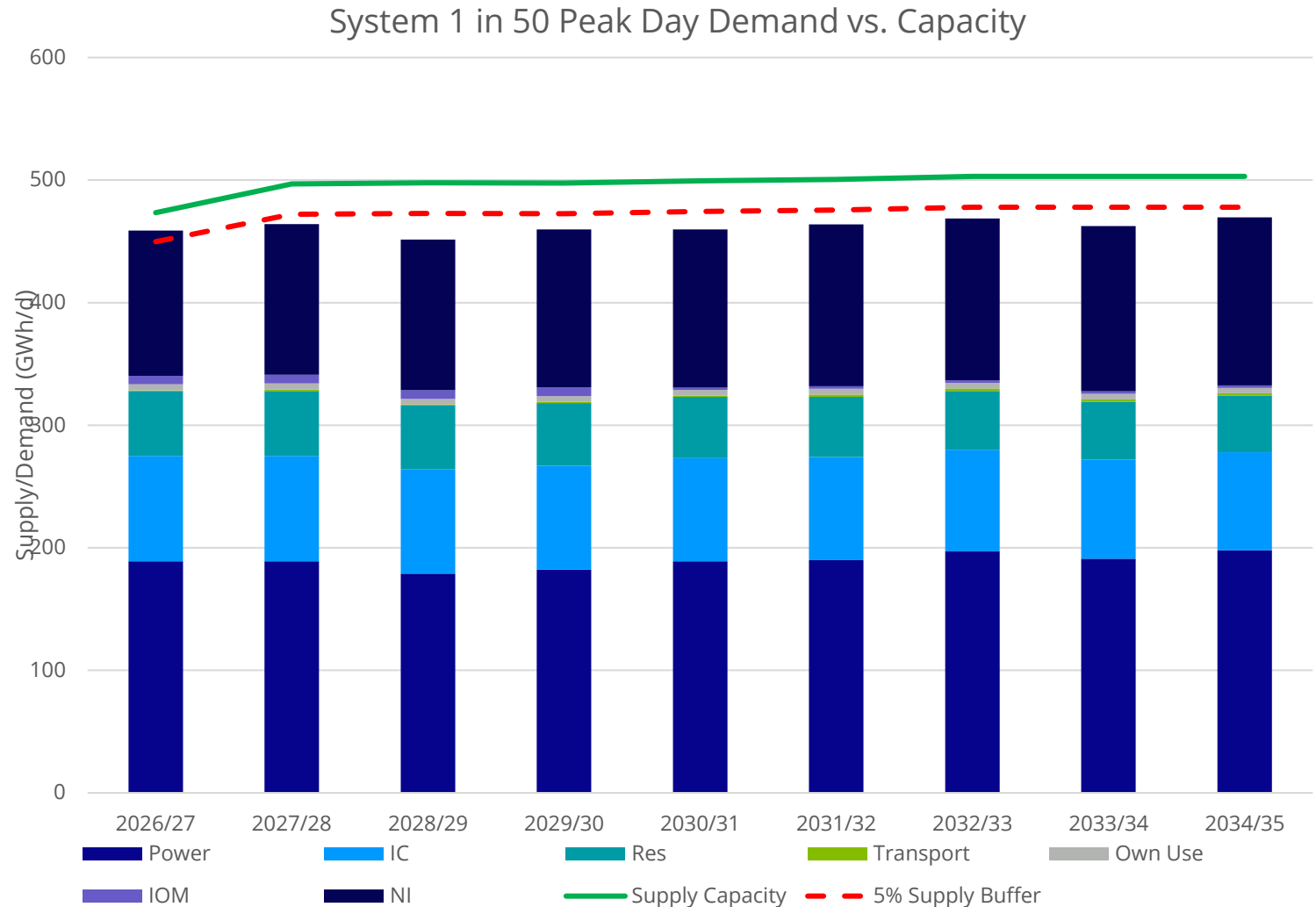


By 2034, total emissions from the gas network are forecast:
To decrease by 40% in the Best Estimate, to decrease by 42% in the Low and to decrease by 30% in the High



System Capacity and Headroom

- Winter 2027/28 total entry capacity c.500GWh/d
 - Increased Moffat entry capacity of 475GWh/d following completion of capacity upgrade projects
- As Corrib declines, biomethane compensates, together supplying approx. 25 GWh/d over the period
- GNI recommends that capacity headroom of at least 5% on Best Estimate supply projections should be maintained going forward. This allows for risk and uncertainty in supply and demand forecasting.



Capacity Headroom - Sensitivity Studies

- Capacity headroom remains tight over the period for the Best Estimate (BE) sensitivity studies. The 5% capacity headroom requirement is breached for most years. Total capacity is also breached for some years post 2030/31.
- Delays to biomethane roll out or an early cessation of Corrib gas production (pre 34/35) would further reduce projected headroom.
- The sensitivities are considered plausible and should be planned for.

Scenario Description	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
Low Scenario	6.3%	11.6%	16.4%	15.6%	17.0%	18.1%	19.6%	21.0%	21.3%
Best Estimate Scenario	2.9%	6.5%	9.0%	7.5%	7.4%	7.4%	7.0%	8.0%	6.7%
High scenario	-2.2%	0.9%	3.4%	1.1%	0.5%	-0.1%	1.2%	1.3%	-1.8%
BE & Celtic Interconnector Outage			4.4%	2.7%	3.0%	3.3%	5.2%	5.6%	3.1%
BE & EirGrid High Elec Demand	-2.1%	1.3%	3.8%	1.5%	0.9%	0.6%	2.1%	2.5%	-0.6%
BE & New LEU connections on Electricity System. 200 MW per annum from 30/31					5.5%	3.7%	1.0%	0.3%	-2.5%

>5% Supply Capacity Headroom
<5% Supply Capacity Headroom
<0% Supply Capacity Headroom

Public Consultation timeline

- 4-week publication consultation period - CRU website
- Expected August/September
- Final report with consultation submission response paper – GNI website



Moving Ireland's Energy

10. GNI presentation on the PAYG Project

Aidan Hogan– Retail Markets Manager

PAYG System Replacement Project

Introduction



Purpose of Presentation

- Flag to Code Mod Forum that a PAYG Code Mod Proposal will be submitted in Aug / Sep
- Provide introduction to PAYG project
- Provide high-level overview of the proposed modification and the governance approach

Project

- Replacing all PAYG meters (100k+) with new connected meters
- IT project to integrate new systems (2026-28) + meter replacement programme (2028-32)

Code Modification

- Code of Operations must set out high-level obligations for gas suppliers in relation to the new PAYG system, as distinct from existing obligations relating to the existing system
- Old & new PAYG systems will run concurrently for 4-5 years so Code must cater for both
- Changes will be relatively minor in nature, and are not expected to be complex

Governance & Approval

- GNI and suppliers have agreed the high-level design that underpins the Code Mod proposal
- PAYG Market Design Working Group (linked to GMARG) will lead the development of the Code Mod and (with GMARG endorsement) will submit the Mod to the Code Mod Forum



PAYG System Replacement Project

Project Summary

WHAT

- Replace 100k+ meters and supporting IT systems
- Provide connected meters that can communicate independently each day
- Customer access to online top-ups, balances, and consumption via web portals & mobile apps
- Market messages for GNI-Supplier data flows

Gas Card Meter

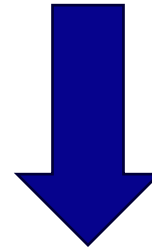


WHY

- Maintain continuity of service to 100k+ PAYG customers (1 in 6 of all residential customers)
- Meters end-of-life (manufacturing ceased)
- Product not customer friendly (can't top-up online or view balance online)
- Improved ability to support PAYG customers experiencing financial hardship (credits, non-disconnect periods etc.)

WHO

- **Gas Suppliers** - build PAYG billing system, customer portals / apps, payment services
- **GNI** - supply and install meters, communications service, IT systems to collect & process meter data
- **CRU** - Approve high-level design, consult on PAYG Policy, approve market design documents



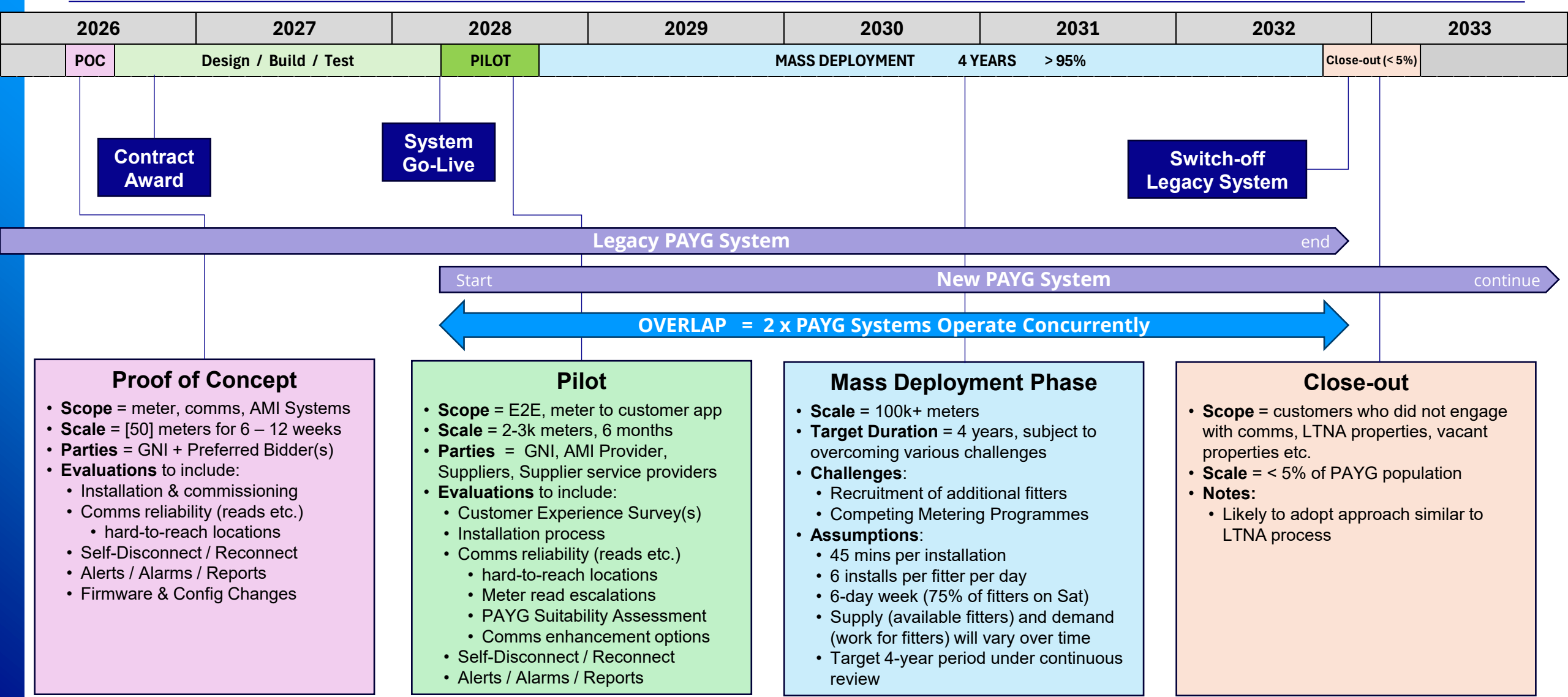
Connected Meter

WHEN

- **IT Build & Deployment** - 2026 - 2028
- **Pilot Meter Deployment** - 6 months (2028)
- **Mass Meter Deployment** - 4 yrs (2028 – 2032/33)
- **Shut-off Existing PAYG System** - 2032/33

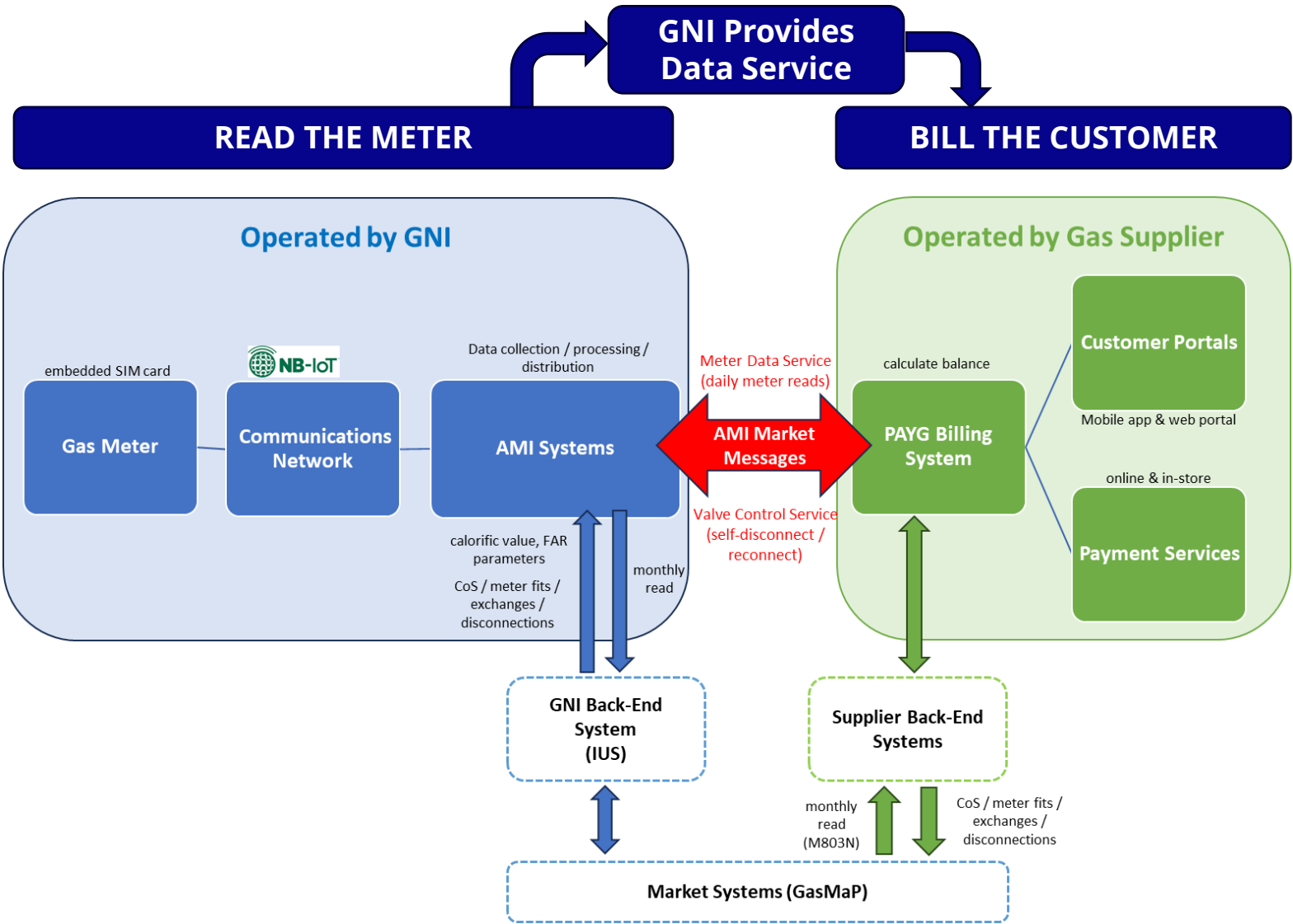
Indicative PAYG Project Timeline

TBC - System Go-Live Date Dependent on Completion of GNI Procurement



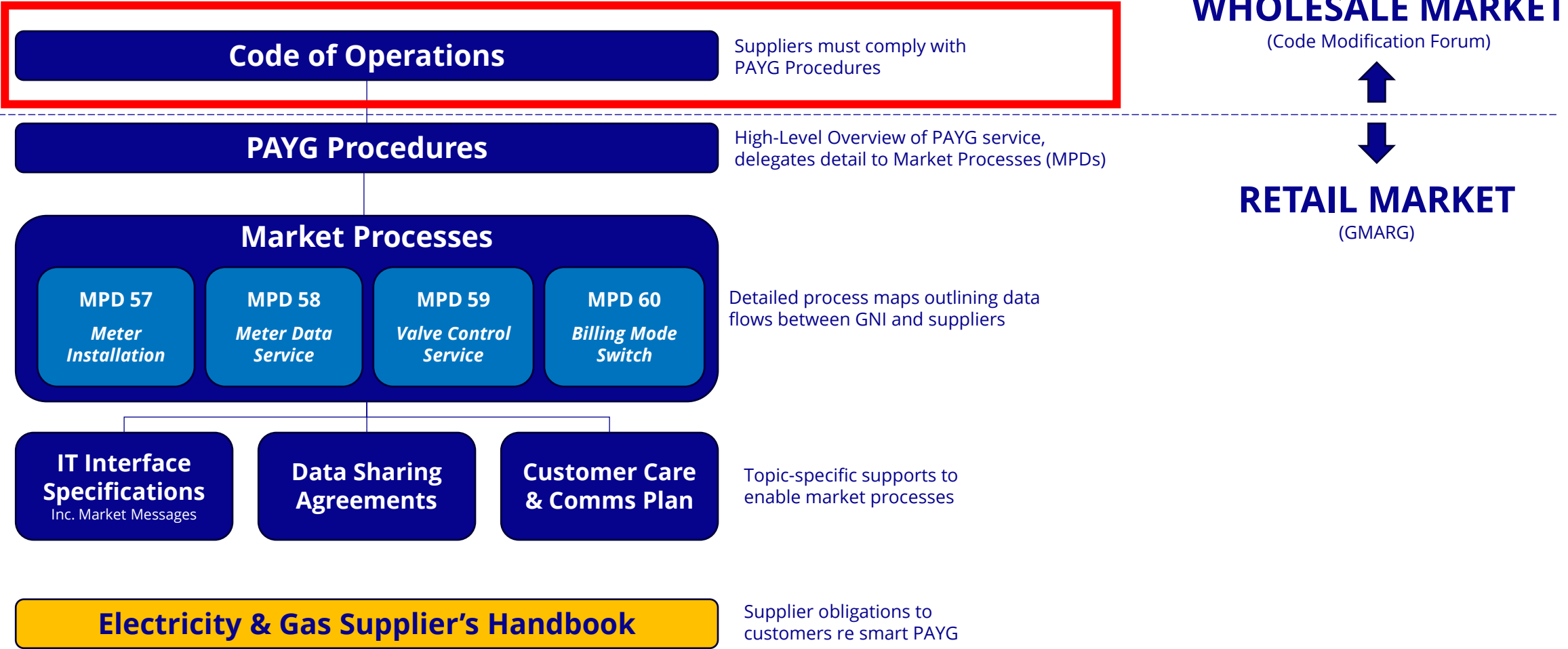
PAYG System Replacement Project

System Architecture



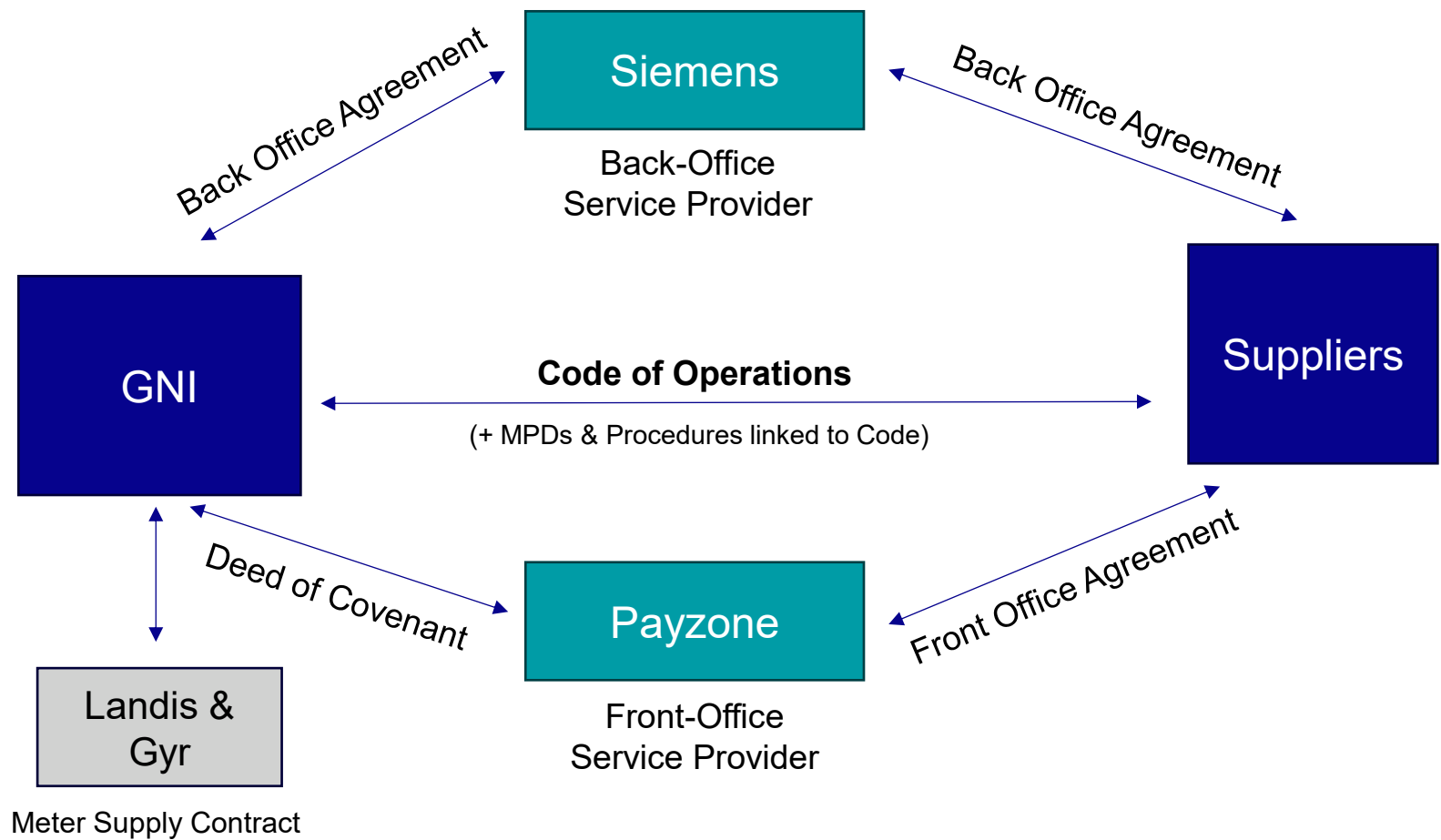
PAYG Code Modification

Market Design Documentation



PAYG Code Modification

Contractual Structure (Existing PAYG System)



Meshed contractual framework adds complexity

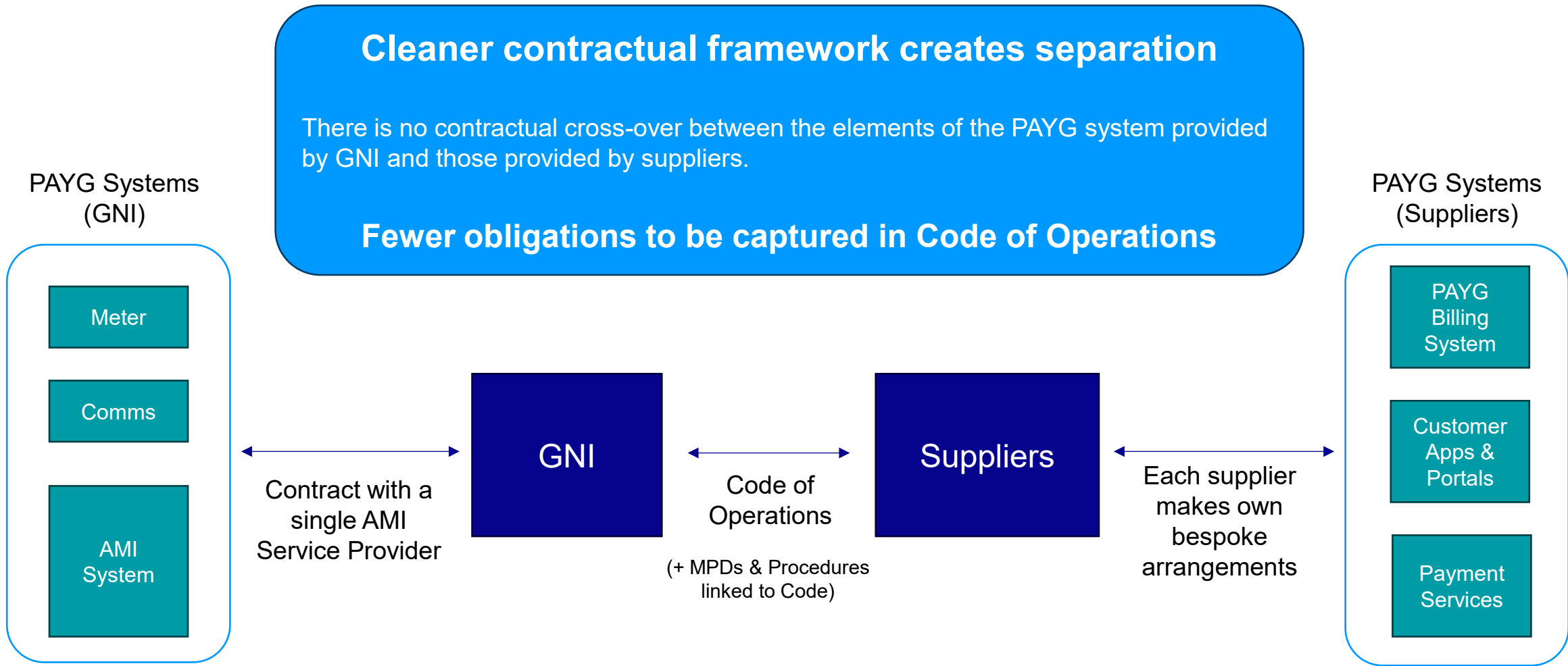
Both GNI and suppliers have contractual relationships with the same PAYG system providers:

- Suppliers must sign commercial contracts with the back-office provider that GNI has contracted;
- GNI has a contractual arrangement with the front office provider that suppliers have contracted.

Code of Operations needs to capture these obligations

PAYG Code Modification

Contractual Structure (Existing PAYG System)



PAYG Code Modification

Content & Approval Process

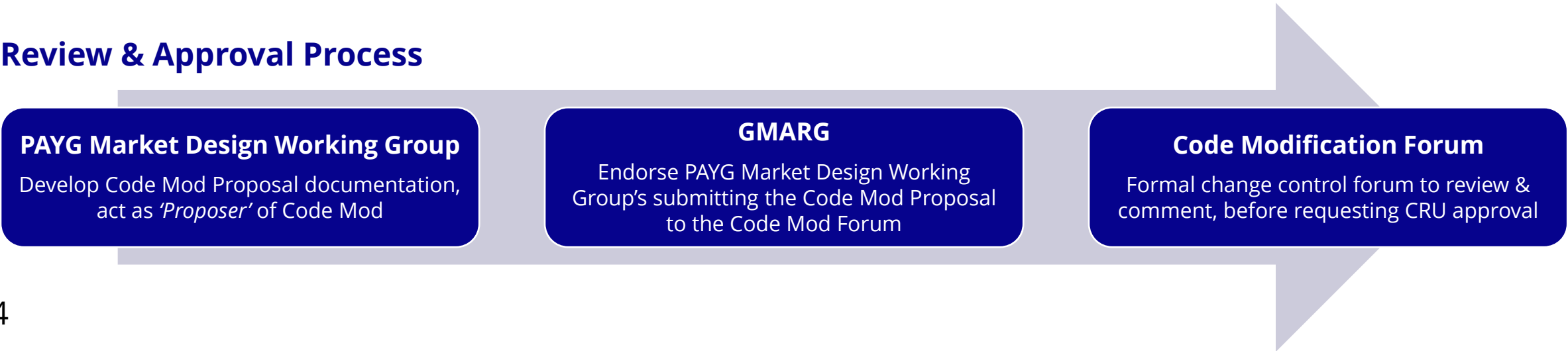


Content of Code Modification

Code Provisions re CURRENT System	Code Provisions re PROPOSED System
Supplier must comply with PAYG Procedures	As before, Supplier must comply with PAYG Procedures
Supplier must sign Back-Office Agreement	N/A - Supplier will have no contractual relationship with back-office provider
Supplier must sign Front Office Agreement	N/A - GNI will have no contractual relationship with front office provider
Deed of Covenant between GNI and FOSP	
N/A	Introduce terminology to distinguish old PAYG system v new PAYG system

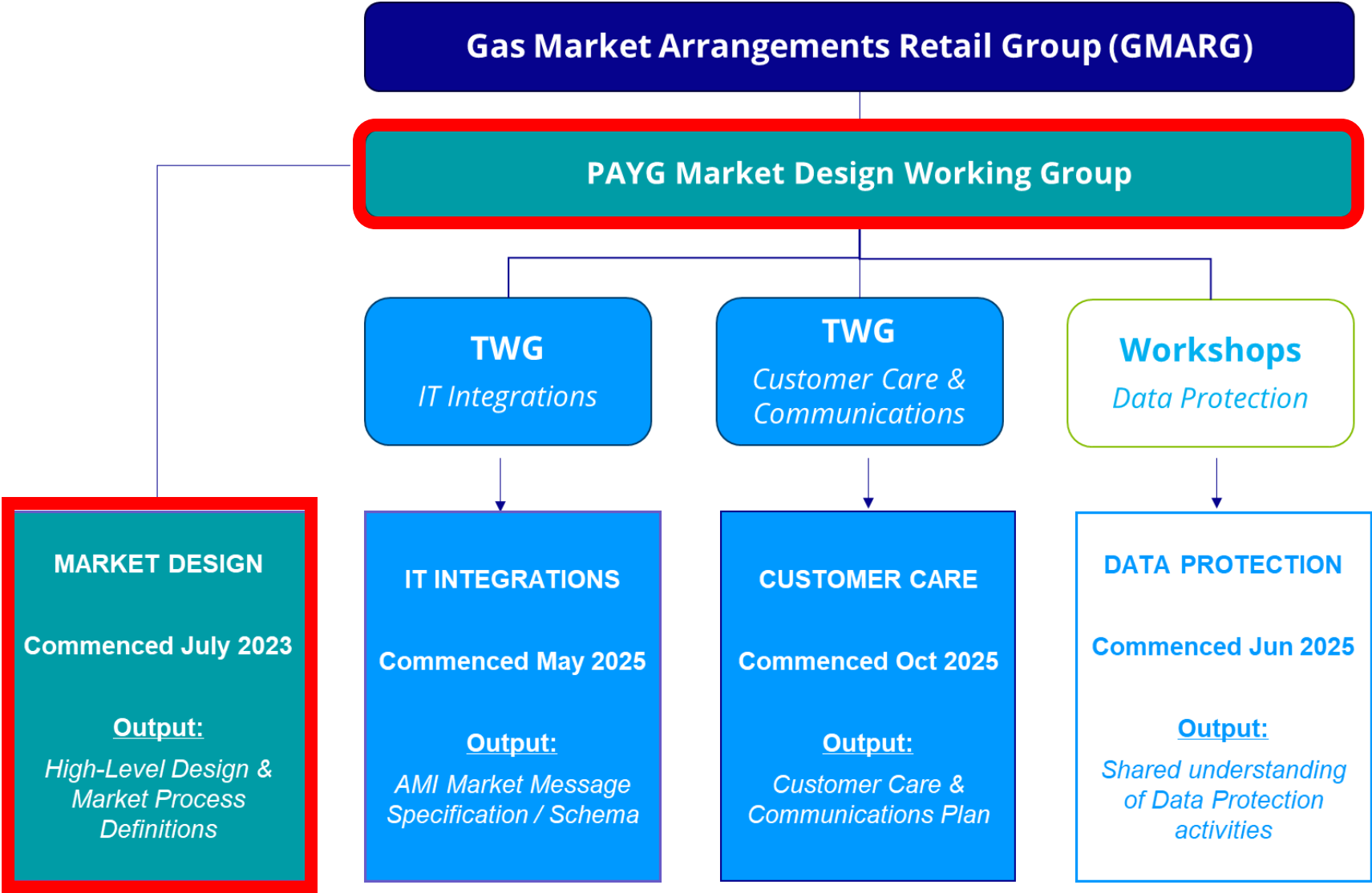
- Both systems will operate concurrently for a number of years so Code must make provision for both

Review & Approval Process



PAYG Market Design Working Group

Governance Structure



PAYG Market Design Working Group

Overview



Formation

- The Market Design Working Group was set up by GMARG in July 2023 (c. 60 meetings to date)

Purpose & Outputs

- The group is tasked with developing the market design for the proposed new PAYG System
- The group's outputs include the [PAYG High-Level Design](#) and draft Market Process Definitions ([MPD 57](#), [MPD 58](#), [MPD 59](#), and [MPD 60](#)).

Membership

- GNI and supplier staff working in PAYG operations roles (+ some regulatory folk).

Governance & Approvals

- Decisions by consensus, with disputes referred to GMARG for resolution
- GMARG approves the group's outputs, with regular updates from the working group at GMARG meetings

Working Group Materials

- [Working group documents](#) include agendas, slides, meeting notes, working documents, and reference documents

PAYG Code Modification Proposal

Proposed Timeline



GMARG		Code Modification Forum	
		Intro to upcoming Code Mod	10 June CMF Meeting
Circulate proposal to PAYG Market Design Working Group	15 June		
Discuss at MD WG Meeting #61	30 June		
Deadline for supplier feedback	15 July		
Approval of proposal at MD WG Meeting #62	4 Aug		
MD WG submits Code Mod Proposal to GMARG	6 Aug		
GMARG Approval of Code Mod Proposal	20 Aug GMARG Meeting		
MD WG Submits Code Mod Proposal to CMF	22 Aug		
		Present proposal to CMF	9 Sep CMF Meeting
		Shipper feedback deadline	TBC
		CMF approval	14 Oct CMF Meeting
		CRU Approval	Nov 2026

PAYG System Replacement Project

Code Modification Proposal In Q3 2026



Key Messages

- Retail market groups will develop the proposal (June – Aug) prior to submission
- PAYG Market Design Working Group will be the 'proposer' of the Code Mod
- Proposal submitted to Code Mod Forum in Aug / Sep will be endorsed by GMARG and will have been fully vetted by your retail market colleagues in advance

Moving Ireland's Energy

11. GNI presentation on the Emergency Section of the Code of Operations

Kieran Quill – Senior Market Analyst

Existing Code Provisions – Part H (Operations)

Section 1.9.3 Provides that where pursuant to an emergency the Transporter instructs a shipper to give any notification or communication to and end user or supplier the Shipper shall comply and procure that the end user or supplier shall comply

Section 1.2.5 – *“Nothing in this Section 1 shall relieve a Shipper from any of its financial obligations arising under this Code or any Ancillary Agreement”*

Section 1.11.1 – *“The Transporter shall:*

- (a) Not be liable for any costs incurred by a Shipper which arise out of an Emergency or as a result of taking Emergency Steps or any steps imposed by the Transporter in accordance with section 1.7.5 and*
- (b) Be cash neutral with regard to any costs incurred by the Transporter in respect of an Emergency or as a result taking Emergency steps or any other steps imposed by the Transporter in accordance with Section 1.7.5, which costs shall be charged to the Disbursements Account.”*

Section 1.11.2 – *“Each Shipper shall be liable for its own costs incurred in respect of an Emergency save, however, that if the offtake of Natural Gas by a Shipper (“**First Shipper**”) is reduced pursuant to Section 1.9 (Offtake Point Control) with the effect that the First Shipper’s Natural Gas is offtaken by another Shipper (“**Benefiting Shipper**”) the Benefiting Shipper shall pay the Imbalance Price (Non RNG) for that quantity of the First Shipper’s Natural Gas offtaken by such Benefiting Shipper to the Transporter on behalf of the First Shipper and the Transporter shall pay such sums so received to the First Shipper”*

Code Provisions in a current Modern Emergency Scenario – Some Discussion Points

The existing code provisions were developed in an era of an entry/exit system and the following issues now arise:

- In the event of Benefiting Shipper default the cost of the unpaid gas is smeared across all Shippers which would include the First Shipper with the shipper contributions calculated pro rata to throughput based on entry and exit, as per the current disbursement rules.
- The non-payment smear would relate entry and exit flows to such Day(s) over the month(s) for the period of the Emergency
- Probable that an emergency scenario would lead to a significant increase in wholesale gas prices in Ireland (and potentially UK) realising in very substantial liability for the Benefiting Shipper.

Code Provisions in a current Modern Emergency Scenario – Some Discussion Points

The existing code provisions were developed in an era of an entry/exit system and the following issues now arise:

- There may be no existing trading relationship between the First Shipper and the Benefitting Shipper.
- Section 1.10.1 states that provisions of the Code could be suspended including the balancing regime and associated Balancing Charges and Scheduling Charges) – what is implication of a Benefitting Shipper receiving gas?
- What if trading on the Marex trading platform were suspended – consequently the cashout price would be NBP SAP with 3.5% penalty applied?
- When will the benefitting Shipper be expected to pay - 20th of following month?
- What incentives has the First Shipper to maximise and maintain production during an emergency?
- Should there be more penal charges to a defaulting Benefitting Shipper?

Compensation Mechanism:

1. Amend Shipper payment provisions in Code of Operations.
2. Compensation Mechanism - The National Gas Emergency Plan could be reviewed and amended to include a compensation mechanism. In this regard a possible model is the United Kingdom E1 – Network Gas Supply Emergency Procedure, which contains a compensation mechanism maintained by the National Gas Transmission which contains provisions for fixing emergency cash-out prices and has a mechanism for post-emergency compensations claims.
3. Financial Security – The required levels may be prohibitive.
4. Maintain Existing Regime.

Preferred review to involve options 1 and 2 above

Moving Ireland's Energy

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

Bi-directional capacity exemptions

10/06/2026

Bi-directional capacity exemptions (1/2)

- In 2022, BEIS and the CRU issued exemptions to National Gas Transmission (then part of National Grid), GNI, GNI (UK), and Premier Transmission from the obligation to provide Bi-directional Capacity at the Moffat and Gormanston Interconnection Points; **the current exemptions expire on 28 September 2026.**
- The EU Gas Security of Supply Regulation (EU) 1938 / 2017 requires that TSOs shall enable permanent physical capacity to transport gas in both directions ('bi-directional capacity') on all interconnections between EU Member States. This requirement is captured under Article 5 (Infrastructure Standard) of the Security of Gas Supply Regulation, which states that;

"The transmission system operators shall enable permanent physical capacity to transport gas in both directions ('bi-directional capacity') on all interconnections between Member States, except:

a) in the case of connections to production facilities, to LNG facilities and to distribution networks; or

b) where an exemption from that obligation has been granted, after detailed assessment and after consulting other Member States and with the Commission in accordance with Annex III".



Bi-directional capacity exemptions (2/2)

- Furthermore, Annex III states that;
*"To enable or enhance bi-directional capacity on an interconnection or to obtain or prolong an exemption from that obligation, **transmission system operators on both sides of the interconnection shall submit to their competent authorities ('competent authorities concerned') and to their regulatory authorities ('regulatory authorities concerned')** after consulting with all transmission system operators potentially concerned:*
 - a) proposal to enable permanent physical capacity to transport gas in both directions for permanent bi-directional capacity concerning the reverse direction ('physical reverse flow capacity'); or*
 - b) a request for an exemption from the obligation to enable bi-directional capacity.*

The transmission system operators shall endeavour to submit a joint proposal or request for exemption."

The same provisions were retained in UK law post Brexit under S.I. 2019 No. 531; the Gas (Security of Supply and Network Codes) (Amendment) (EU Exit) Regulations 2019. Under both the EU and UK Regulations the Competent Authorities may ***"grant or prolong a temporary exemption for a maximum period of four years"***.



- The legislation sets out, that a proposal for enabling or enhancing bi-directional capacity or a request for granting or prolongation of an exemption shall include a cost benefit analysis ("**CBA**") based on the following elements:
 - an assessment of market demand (questionnaire);
 - projections for demand and supply;
 - the possible economic impact on existing infrastructure;
 - a feasibility study;
 - the costs of bi-directional capacity including the necessary reinforcement of the transmission system; and
 - the benefits to the security of gas supply taking into account the possible contribution of bi-directional capacity to meeting the infrastructure standard set out in the relevant legislation.
- The purpose of the Market Assessment consultation papers is to enquire from the market as to the potential demand(s) for bi-directional capacity at the Moffat / Gormanston IPs, such that the TSOs can subsequently discharge their obligations, in accordance with the relevant legislation.

- TSOs to issue Market Demand Assessment papers mid-June – Post on TSO web-sites and notified via the Cod Mod Forum.
- Allow for 4 week review period for industry feedback.
- Then following stakeholder feedback, provide update to Competent Authorities and request prolongation of current exemptions in advance of expiry on 28 September 2026.

Next CMF Meeting

- The Code Mod Forum will be a Teams meeting on the 9th of September.

Next CMF Meeting


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

Appendix

Useful resources

EU legislation

[Hydrogen and decarbonised gas market](#)

[Methane emissions - European Commission](#)

[The Net-Zero Industry Act](#)

[European grids package](#)

[2nd PCI/PMI list](#)

Competitiveness Compass

[EU Competitiveness Compass](#)

[Factsheet - Competitiveness Compass.pdf](#)

Action Plan for Affordable Energy

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

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

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

[AccelerateEU](#)

[Citizens Energy Package](#)

Clean Industrial Deal

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

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

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

Reference

[40th European Gas Regulatory Forum - Energy - European Commission](#)

[Copenhagen Infrastructure Forum May 2026 - Conclusions](#)

Omnibus Package

[Omnibus Press Release](#)

[Omnibus I](#)

[Omnibus II](#)

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

2026 expected European 'legislative train'

Quarter	Initiative	Description
In train	EU Grids Package - TEN Regulation Review - Permitting Directive <i>under the EU Grids Package</i>	Accelerates permitting, improves cross-border grid planning and integrates H2 infrastructure.
In train	Connecting Europe Facility (CEF) Regulation	Supporting the development of cross-border transport, energy and digital infrastructure
Q1 2026	Action Plan on Affordable Energy [Citizens' Energy Package]	Targets energy price reduction and structural reforms
Q4 2026	Energy Security Framework	To strengthen the Union's energy security; ensuring it is sufficiently secure and resilient.
July 1 st 2026	Ireland - Presidency of the European Council	To 31st December 2026
By Aug. 5 th 2026	GHP Directive (EU) 2024/1788 transposition	Transposed into National Legislation
Through 2026	EU Competitiveness Compass	2025 EC initiative; Seven actions (Oct 2025)
Through 2026	REPowerEU Implementation	EC roadmap to end Russian energy imports presented in May. Targeted amendments of existing legislation, including RED, EPBD and EED
** 'New Initiatives' – European Commission Work Programme 2026 - <i>monitoring</i>		
Q3 2026	Energy Union Package for the decade ahead	To include legislative proposals on governance, renewable energy, energy efficiency and CO2 transport infrastructure
Q3 2026	Omnibus to simplify energy product legislation	Streamlining and modernising EU rules on energy products.
Q4 2026	Climate Package for the decade ahead	Rev. of national targets and flexibilities in the EU climate policy framework.