



Workshop: Gas Governance Rules Changes

Tuesday 23 June 2026

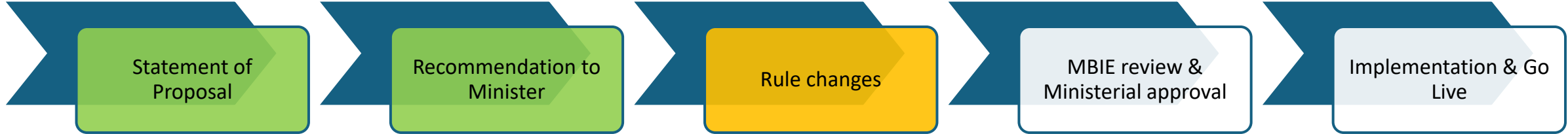


Agenda

Time	Session
9:30 AM – 9:45 AM	Welcome and introductions
9:45 AM – 11:15 AM	Session 1: D+1 (rules focus)
11:15 AM – 11:30 AM	Morning tea break
11:30 AM – 1:00 PM	Session 2: D+1 (systems focus)
1:00 PM – 1:30 PM	Lunch Break
1:30 PM – 2:30 PM	Session 3: Renewable gas injection
2:30 PM – 2:45 PM	Afternoon break
2:45 PM – 3:45 PM	Session 4: Advanced Gas Metering
3:45 PM – 4:00 PM	Closing session

Workshop objectives

- Introduce/recap the rule changes project
- For each topic (D+1, renewable gas injection, AGMI):
 - Introduce rule changes
 - Implementation activities & approach
 - Discuss focus points
- Agree on way forward with realistic timeframes



Topic	Proposals
Advanced gas metering infrastructure	- Introduce new gas registry fields for AGMI - Modify allocation groups for AGMI consumers - Determine criteria for assigning AGMI ICPs to allocation groups - Modify allocation methodology & UFG allocation for AGMI - Consider alternative approaches to UFG allocation - Modify G1M gas gate criteria to include AGMI consumption - Separate the calculation of SADS and GGRP
D+1	- Introduce D+1 allocation stage - Introduce D+1 allocation methodology (and modify for AGMI & renewable gas injection) - Require daily submissions for daily-reconciled customers (TOU & AGMI) - Require 7-day validated submissions - Introduce telemetry threshold for the largest TOU consumers - Require that customer & trading information is accurate and up to date
Renewable gas injection	- Define distribution injection points - Require that gas composition is calculated and published for networks with distribution injection points - Require contract IDs for traders at distribution injection points - Modify allocation methodology for networks with distribution injection points
Minor & technical changes	- Clarify ICP maintenance deadlines in gas registry - Broaden the scope of NZS 5259 compliance - Require use of GIC data for temperature correction - Other minor & technical changes
Non-regulatory changes	- Allow approved non-industry participants access to an ICP lookup API - Improve gas registry security - Introduce a D+1 run report - Allow use of the GIEP Exchange for GAA submissions/reports

Topic	Proposals
AGMI	- New ICP parameter in gas registry - Changes to allocation groups & UFG allocation - Amendments to allocation methodology
D+1	- Add D+1 allocation stage and allocation methodology - Require daily submissions for daily-reconciled consumers - Require 7-day submissions - Telemetry threshold for large consumers (>20TJ)
Renewable Gases	- Define distribution injection points - Require gas composition calculation for networks with distribution injection points - Modify allocation methodology for networks with distribution injection points
Other	- Improve registry maintenance deadlines - Provide a stronger link to NZS 5259 - Standardise temperature correction - Other minor & technical changes

Implemented November 2024

GAS (SWITCHING ARRANGEMENTS) RULES 2008	
Pursuant to sections 43G, 43Q and 43S of the Gas Act 1992, the Minister of Energy, acting on the recommendation of Gas Industry Company Limited as the industry body appointed pursuant to s43ZL of that Act, makes the following rules.	
Contents	
1. Title 2. Commencement 3. Purpose 4. Outline 5. Interpretation 6. Limit on application of rules 7. Obligation to supply registration information 8. When registration information must be kept 9. Registry operator must keep register 10. Changes to particulars 11. Effect of registration 12. Effect of ceasing to be registry participant 13. Appointment of registry operator 14. Other terms of registry operator service 15. Publication of registry operator service 16. Insurance cover 17. Performance standards to be agreed 18. Self-review must be carried out by registry operator 19. Registry operator must report to the Review of registry operator performance 20. Audits of the registry and the registry operator 21. Development fee 22. How and when development fee must be paid 23. Ongoing fees 24. How and when estimated ongoing fees payable 25. How and when actual ongoing fees payable 26. General provisions regarding fees 27. Giving of notices 28. When notices taken to be given 29. Entering information in the registry 30. When notices to be given 31. When notices to be given and entering information 32. Registry notice of changes to ICP particulars 33. Registry access 34. Obligation of registry participants to provide information 35. Other obligations of registry participants 36. Use of ICP identifier on invoices 37. Consumer queries 38. Establishment of registry 39. Purpose of registry 40. Requirements of registry 41. Initial population of registry 42. Accuracy of initial information 43. Assignment of ICPs 44. The industry body to determine appropriate loss factors 45. Distributors to give notices in relation to loss factors 46. Distributors to determine network pressure 47. Distributors to determine loss factors 48. Distributors to give notices in relation to loss factors 49. Meter owners to determine metering	
GAS (DOWNSTREAM RECONCILIATION) RULES 2008	
Pursuant to sections 43F, 43Q and 43S of the Gas Act 1992, the Minister, acting on the recommendation of Gas Industry Company Limited as the industry body appointed pursuant to s43ZL of that Act, makes the following rules.	
Contents	
1. Title 2. Purpose 3. Outline 4. Commencement	
Part 1 General Provisions	
5. Interpretation 6. Definition of allocation groups 7. Appointment of allocation agent 8. Publication of allocation agent service provider agreement 9. Allocation agent website 10. Insurance cover 11. Performance standards to be agreed 12. Self-review must be carried out by allocation agent 13. Allocation agent must report to the industry body 14. Review of allocation agent's performance by the industry body 15. Ongoing fees 16. How and when estimated ongoing fees payable 17. How and when actual ongoing fees payable 18. General provisions regarding fees 19. Industry body may exempt allocation participant 20. Urgent exemptions 21. Variation or revocation of exemptions 22. List of exemptions 23. Giving of notices 24. When notice taken to be given 25. Information exchange file formats	
Part 1A Atypical gas gates	
25A. Determination of direct connect gas gates 25B. Determination of unmetered and oversized metered gas gates 25C. Determination of G1M gas gates	
Part 2 Allocation process	
26. General obligations of allocation participants 27. Metering equipment accuracy 27A. Requirements for information supplied by transmission system owner 28. General obligations of retailers	

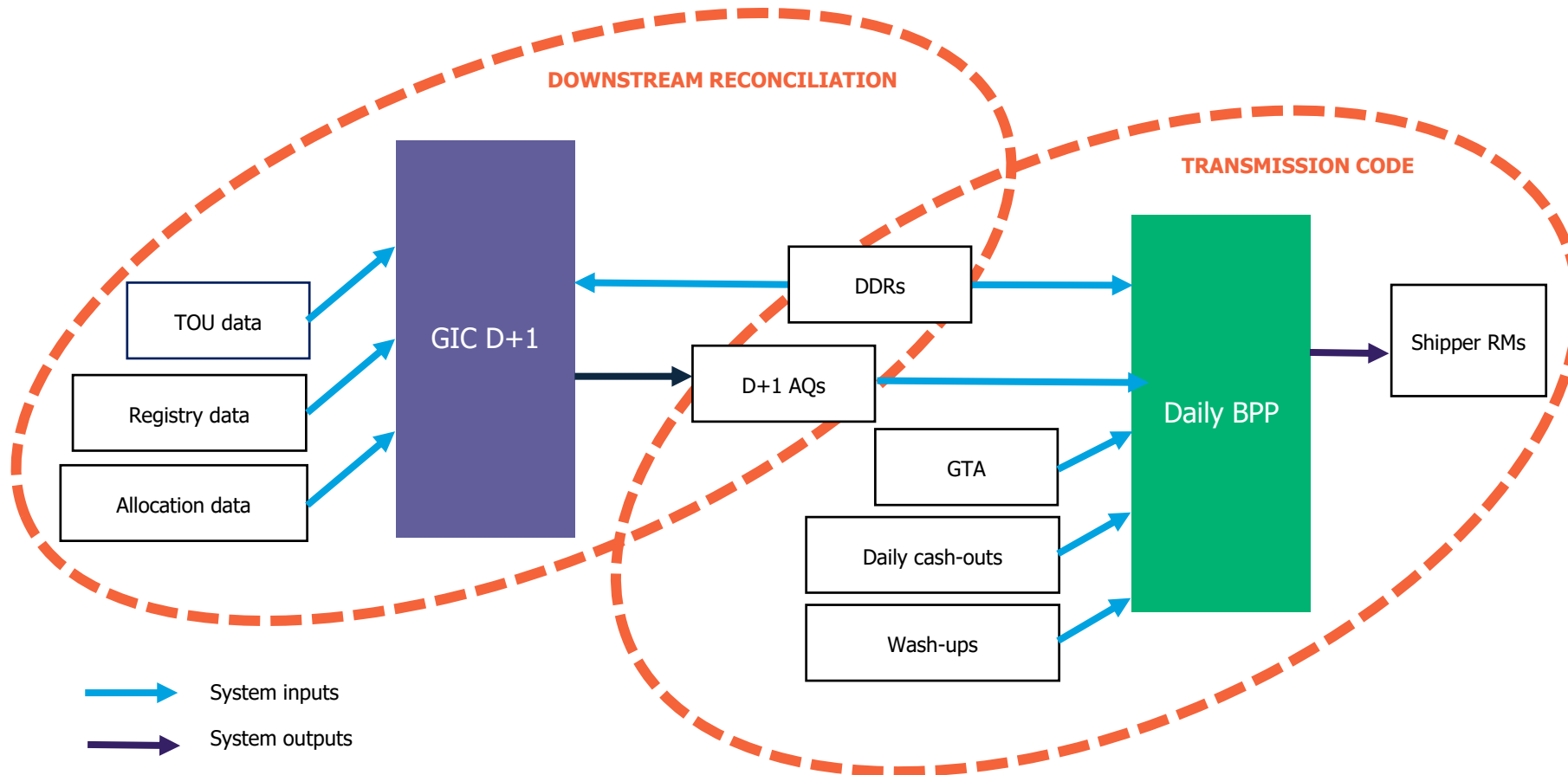
Dependent on stakeholder feedback and implementation activities for each topic

Implementation activities

	D+1	AGMI	Renewable gas
Regulatory/GIC	Determinations: criteria for invalid allocations, deadlines for submission & publication,	Supporting service provider system changes	Guideline for determining GC of blended gas
Industry system/process changes	7-day D+1 processes Submissions for AG3 & AG5	Subs for AG3 & AG5 for GAA Population of new gas registry field, system integration	Process for exchanging GC data New subs for DIPs to GAA & D+1
Service provider system/ process	Process for invalid allocations Support changes for 7-day D+1 (AASPA)	Changes to GAA allocation methodology New field in gas registry	Changes to GAA and D+1 due to DIPs
Broader changes	Rollout of telemetry for AG2 consumers >20TJ Changes to GTC for 7-day D+1		Impact of DIP allocations on transmission system

Session 1: D+1 (rules focus)

Scope of rule changes



D+1: summary of rule changes

Rule	Title	Topic
Reconciliation Rules – definitions & concepts		
3.2	Outline	Amendment to recognise daily allocations
5.2	Interpretation	Various new terms and amendments to existing terms
25B	Determination of unmetered and oversized metered gas gates	Addition of non-telemetry gas gates

Rule	Title	Topic
Reconciliation Rules – allocation methodology		
27H	Determination of criteria for invalid D+1 allocation	New rule for Gas Industry Co to make determination
27I	Determination of deadlines for D+1 allocation	New rule for Gas Industry Co to make determination
30A	Provision of consumption information for D+1 allocation	New rule for retailer D+1 submissions
42	Provision of daily injection information for D+1 allocation	New rule for TSO/distribution injection party D+1 submissions
43	Allocation agent to use estimates	Amendments to existing rule on estimation by the allocation agent
43A	Invalid D+1 allocation	New rule for dealing with errors/issues
44A	D+1 allocation methodology	New rule similar to rule 45 (global method of allocation)
44B	Determination of retailer residual mass market proportion	New rule capturing requirements for D+1 mass market regression model
47A	D+1 allocation	New rule similar to rules 48 to 50
53	Allocation agent reports	Amendment to introduce month-end D+1 report

D+1 points for discussion

- Allocation days
- Allocation runs vs allocation results
- Sequence of allocation stages
- Timing/deadlines for D+1 process
- Invalid D+1 allocations
- D+1 allocation methodology

Allocation days

allocation day means the day that a **D+1 allocation** is performed for a **consumption day**

consumption day means a day during which gas is supplied to consumers;

- Allocation agent performs a D+1 allocation on an allocation day in respect of one or more consumption days
- If something goes wrong, the allocation agent determines an invalid D+1 allocation, and the next day becomes the allocation day for the affected consumption day

47A. D+1 allocation

47A.1 For the purposes of these **rules**, a **D+1 allocation** means, in relation to an **allocated gas gate**, the allocation of gas quantities in accordance with rule 44A on an **allocation day** for the previous **consumption day** and all prior **consumption days** in relation to the which the **allocation agent** has notified an **invalid D+1 allocation**.

Allocation runs vs allocation results

allocation results means:

- (a) the quantities determined by the **allocation agent** on an **allocation day** in accordance with rule 47A.1 and allocated to **allocation participants** as **D+1 allocations** under the rules set out in 47A; and
- (b) the quantities determined by the **allocation agent** in accordance with rule 45 and allocated to **allocation participants** as initial, interim, or **final allocations** under rules 48 to 50; and
- (c) includes any quantities allocated as a **special allocation** under rule 51 or corrected quantities allocated under rule 44.3; but
- (d) to avoid doubt, does not include **invalid D+1 allocations**.

- Drafting (r30A, 42, 47A) refers to morning & afternoon D+1 allocations (with refs to unvalidated and validated data)
- Both are *D+1 allocations* which means they are *allocation results*
- Should the drafting only recognise afternoon allocations as *allocation results* or rely on the fact that the afternoon allocation replaces the morning allocation?

Sequence of allocation stages

- The rule amendments will change the sequence of allocation stages and therefore impact what allocation results are current when Firstgas carries out billing

Current sequence	Initial, D+1 (Special), Interim, Final
After rule changes	D+1, Initial, Interim, Final

- This is a GTC concept rather than Reconciliation Rules, but the issue is triggered by the rule changes
- Firstgas and shippers may wish to consider whether to continue using D+1 for the first billing cycle or go back to using the initial allocation

Timing/deadlines for D+1 process

27I. Determination of deadlines for D+1 allocation

In order for the **allocation agent** to perform a **D+1 allocation** on an **allocation day**, the **industry body** must, following consultation with **allocation participants**, determine and **publish** the deadlines for:

- 27I.1** the provision of gas composition values by **transmission system owners** and **distribution injecting parties** in accordance with rule 27C and 27D; and
- 27I.2** the determination and publication of combined gas composition values for distribution systems with **distribution injection points** in accordance with rule 27C; and
- 27I.3** the provision of consumption information by **retailers** for **D+1 allocation** in accordance with rule 30A; and
- 27I.4** the provision of daily injection information by **transmission system owners** and **distribution injecting parties** for **D+1 allocation** in accordance with rule 42; and
- 27I.5** the publication of **allocation results** for a **D+1 allocation** by the **allocation agent** in accordance with rule 47A.

- Where possible GIC will determine these times based on existing processes

Invalid D+1 allocations

27H. Determination of criteria for invalid D+1 allocation

The **industry body** must, following consultation with **allocation participants**, determine the criteria that must be met for the **allocation agent** to notify **allocation participants** of an **invalid D+1 allocation**.

- Allocation agent notifies an invalid D+1 allocation according to criteria determined by GIC
- Allows industry to decide in advance the tolerances/exception criteria so that there is more predictability and expediency on the day (in particular, it allows for automation on non-business days)
- Criteria such as: missing DDRs (whole/partial), missing TOU/AGMI data (whole/partial), missing GC data? Other Firstgas input data?
- Putting this in a GIC determination means it can be adjusted over time

D+1 allocation methodology

Receive daily data

- Receive gas gate and DIP injections (44A.1) & consumption data for allocation groups 1/3/5 (44A.2)
- Estimate any missing values (43.1) & estimate AG2 consumption data (43.1A)
- Calculate total distribution system injection quantity (44A.3)
- Perform validation steps to check for invalid D+1 allocation (43A)

Calculate TOU & AGMI allocations

- Calculate ICP-level allocated quantities (AQs) for AG1-3 by multiplying consumption volumes by relevant UFG factor (44A.4)
- Calculate AQs for AG5 by multiplying gas gate consumption volumes by relevant UFG factor (44A.5)

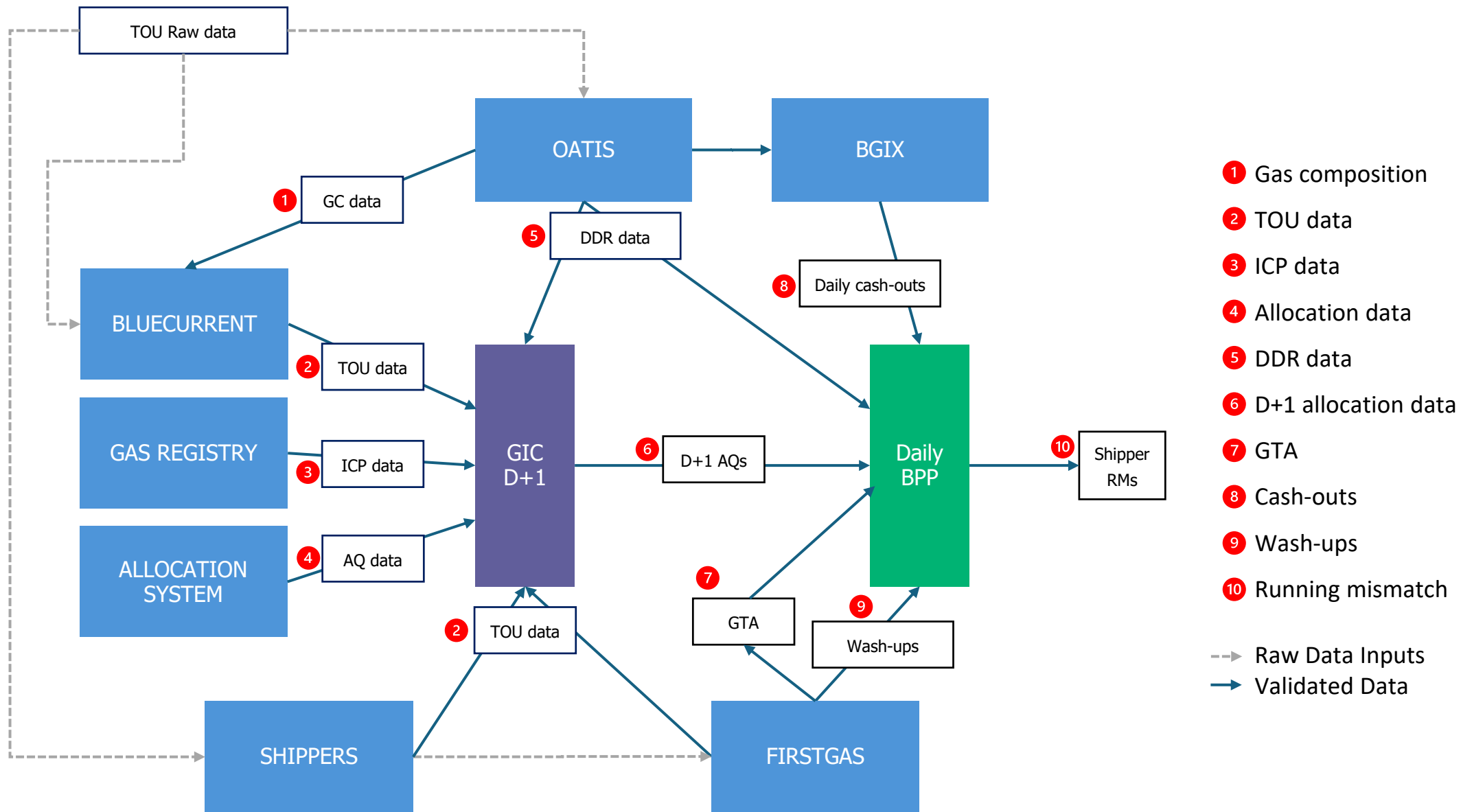
Calculate mass market allocations

- Subtract AG1/2/3/5 AQs from total distribution system injection for each gas gate to give the residual mass market quantity (44A.6)
- Calculate each retailer's AG4&6 AQs for each gas gate by multiplying residual mass market quantity by retailer mass market proportion (44A.7 & 44B)

Aggregate, scale & publish

- Aggregate allocations per retailer and perform scaling if allocations $\neq$ injections (44A.8 & 44A.9)
- Subtract DIP injections from total retailer AQs to determine gas gate AQs (44A.10)
- Perform validation steps to check for invalid D+1 allocation (43A)
- Publish D+1 allocation reports (47A.4 & 47A.5)

Session 2: D+1 (systems focus)



D+1 Components

1. Gas composition
2. TOU data
3. ICP data
4. Allocation data
5. DDR data
6. D+1 allocation data
7. GTA
8. Cash-outs
9. Wash-ups
10. Running mismatch

D+1 Components: 1. Gas Composition

Source		Measured at points on transmission system, published in OATIS	
How is it used?	Current obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?
Input for energy conversion calculation for delivery point metering and TOU customer metering	Current GTC requirement for business days: Validated GC published by 1400 Added to the Rules (rule 27D)	<u>Corrections</u> Gas type corrections flow through in later allocation stages/wash ups <u>Missing data</u> Use previous day's values? For how long? Would this ever trigger a non business day?	Extend to 7-days Introduce DRR obligation to publish gas composition (to cover off any future producers injecting straight into distribution network)

D+1 Components: 2. TOU data

Source

Bluecurrent, Shippers (for manually supplied data), Firstgas (1 site)

How is it used?	Current obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?
If daily data is supplied for a consumer, that ICP is allocated the daily volume multiplied by the relevant UFG factor	- Unvalidated data is provided for the morning run and validated for the afternoon run (depends on GC) - Requirement in D+1 Business Rules - Contractual agreements between retailers and metering providers Added to the Rules (rule 30A)	- Each TOU ICP with missing data is estimated using an individual regression model - Shippers can manually supply a value if they have better information/suspect a metering issue - If the entire TOU file is missing, the D+1 run fails <u>There is no alert/rule for TOU file with partial missing data</u> - With new correctors, no more re-dialling of missing sites	Extend to 7-days Introduce DRR obligation (on retailer) to supply daily metered energy quantities for all AG1 ICPs [Also any AG2 ICPs >20TJ pa must have telemetry installed]

D+1 Components: 3. ICP data

Source	Daily reports from the Gas Registry		
How is it used?	Current obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?
• Market share information used in mass market regression models • For TOU ICPs, any changes to responsible retailer or ICP status are flagged to the allocation agent	Business requirement in Gas Registry FS No change	No direct impact. Intra-month it is a monitoring tool only.	None. Reports are already produced 7-days

D+1 Components: 4. Allocation data

Source		Allocation reports produced by the allocation system	
How is it used?	Obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?
TOU submissions, volume market share information and historical UFG are used in the monthly refresh of the D+1 regression models	Business requirement in allocation system FS Added to the Rules (rule 44B)	Monthly refresh of regression models can be delayed until allocation data is available Allocation errors would be corrected via wash-up or special allocation, both of which flow through into the regression model updates	None. Not a 7-day requirement as allocation reports are only produced three times per month on business days

D+1 Components: 5. DDR data

Source		OATIS	
How is it used?	Obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?
For each allocated gas gate, D+1 allocates volumes to retailers that sum to the day's injected volume	Current GTC requirement Unvalidated: 10:00 Validated: 14:00 Added to the Rules (rule 42)	A D+1 run will not commence unless OATIS data is available for the consumption day. If all DDR data is unavailable this would result in a NBD. Configurable estimation thresholds are built into the D+1 system. The run aborts if estimated volumes exceed: • 1000GJ on a BD • 5000GJ on a NBD It also aborts if <70 gas gates are available	Introduce DRR obligation to publish validated gas gate injections 7 days per week

D+1 Components: 6. D+1 allocation data

Source		GIC D+1 system		
How is it used?	Obligation to provide data?	What happens if it is missing/incomplete?	What changes are required?	
Allocations published twice daily (unvalidated at 11:15, validated at 14:15). Reports sent to retailers and Firstgas via SFTP. The output of the GIC D+1 system is an input to the Firstgas D+1 system. It is used to determine shipper deliveries	D+1 data agreement (contract between GIC and Firstgas) Added to the Rules (rule 47A & 53)	Without GIC D+1 allocations for allocated gas gates, Firstgas D+1 cannot be performed. This would result in a NBD	Introduce DRR obligations for allocation agent to produce D+1 allocations 7-days per week	

Next steps for D+1

- Decide on approach and timing for 7-day D+1
- Re-establish DAWG to work through system change requirements and begin drafting determinations?

Session 3: Renewable gas injection

Renewable gas injection: summary of rule changes

Rule	Title	Topic
Switching Rules – definitions & concepts		
5.2	Interpretation	Modified definition of retailer
44	The industry body to determine applicable ICP parameter codes	Add distribution injection points
45	Distributors to give notices in relation to gas gates	Add distribution injection points

Rule	Title	Topic
Reconciliation Rules – Definitions & concepts		
5.2	Interpretation	New & amended terms
27E	Requirements for information supplied by distribution injecting party	New rule similar to r27A
39A	Retailer to give DIP trading notice to allocation agent	New rule similar to r39
Reconciliation Rules – Gas composition		
27B	Determination of gas composition values	New rules for gas composition
27C	Publication of gas composition values for distribution system with DIPs	
27D	Publication of gas composition values for allocated gas gates	
27F	Industry body to publish guidelines for determination of gas composition for networks with DIPs	
Reconciliation Rules – Allocation methodology		
41	Provision of daily injection information for initial, interim and final allocation	Amendments for DIPs
42	Provision of daily injection information for D+1 allocation	
43	Allocation agent to use estimates	
44A	D+1 allocation methodology	
45	Global method of allocation	
46	Calculation of UFG factor	
53.4	Allocation agent reports	
Sch 2	Allocation in zero consumption situations	

Points for discussion

- New concepts and definitions in the Rules
- Approach for determining gas composition for distribution systems with DIPs
- Amendments to allocation methodology

Distribution injection points and parties

distribution injecting party means any person injecting gas into a distribution system at a **distribution injection point**;

distribution injection point means any point at which gas is injected into a distribution system that is not a **gas gate**;

- Decided to make DIPs distinct from gas gates to avoid confusion with existing terms/codes
- Distribution injection party is a new allocation participant with various obligations
- We welcome feedback on these definitions

Retailer definition

retailer means –

- (a) a gas retailer as defined in the Act; and
- (b) a consumer who receives gas directly at an allocated gas gate or distribution injection point;

- Need to ensure that any party receiving gas at a DIP is bound by the Reconciliation Rules
- We have also added requirement for UoSA (to cover the scenario where a purchaser at a DIP isn't a responsible retailer for an ICP on the distribution system)
- Also essential that every retailer has a TSA (covered in the Switching Rules)

Gas composition

27B. Determination of gas composition values

For each **allocated gas gate** and **distribution injection point**, the relevant **transmission system owner** and **distribution injecting party** must ensure that the following gas composition values are determined for each day:

27B.1	calorific value (MJ/scm); and
27B.2	nitrogen (%mol); and
27B.3	carbon dioxide (%mol); and
27B.4	specific gravity.

- Parameters taken from existing GC data in OATIS
- Expectation is that we use flow-weighted average values but want to explore costs/benefits of available options
- Also want to explore costs/benefits of whether it should be a single value for a network, or whether we should take network pipeline systems into account
- Suggest using an industry working group for this work

Allocation methodology: status quo

- Reconciliation Rules deal with allocating energy quantities consumed on distribution networks, plus any UFG, to the retailers that have customers on those networks
- At present, distribution networks are supplied entirely from the transmission system. Retailers' network allocated quantities produced under the Rules are synonymous with shippers' delivered quantities on the transmission system.
- All retailers with customers on a network have a TSA to deliver gas to that network (r65 of Switching Rules)
- Total allocated volumes each day are equal to the delivery point injection volumes

Allocation methodology: with DIPs

- No longer a 1:1 relationship between gas volumes allocated on a network and gas volumes injected at the delivery point
- Allocating volumes to DIP based on network consumption wouldn't capture the commercial arrangements for biomethane trading (and could create a separate set of distribution-level mismatches for parties to manage)
- Requires a different approach

Example

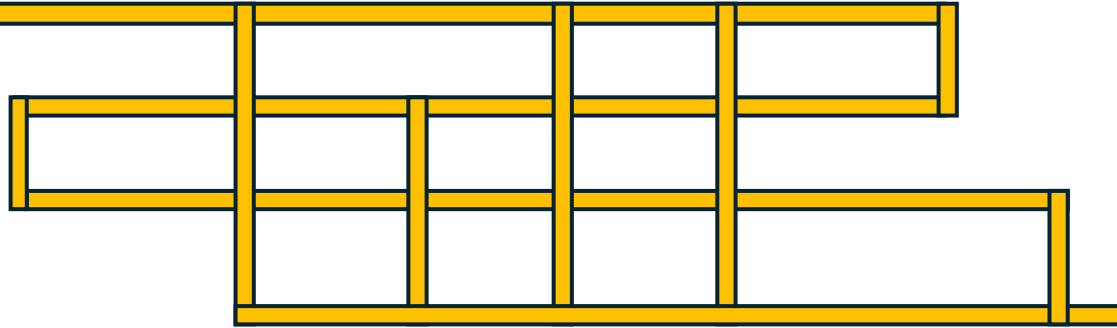
Approach 1
Allocate network
volumes only

Approach 2
Scale allocations
to receipts

Approach 3
Allocate to
biomethane
injection first



**Transmission
Receipts**
100TJ



Network Consumption
115TJ



**Biomethane
Receipts**
15TJ

Example

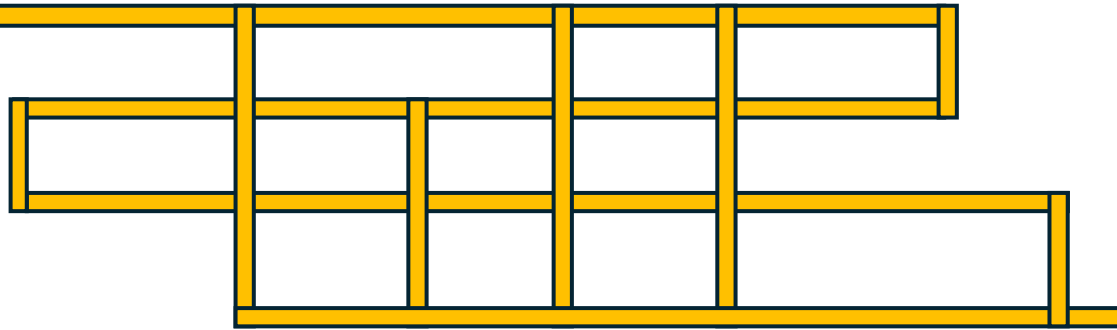
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**Transmission
Receipts**
100TJ



**Biomethane
Receipts**
15TJ

Network Allocation

Retailer A 40TJ

Retailer B 65TJ

Retailer C 10TJ

Total 115TJ ✓

...but this doesn't give Firstgas what it needs for transmission billing/BPP – retailer allocations that sum to the delivery point meter

Example

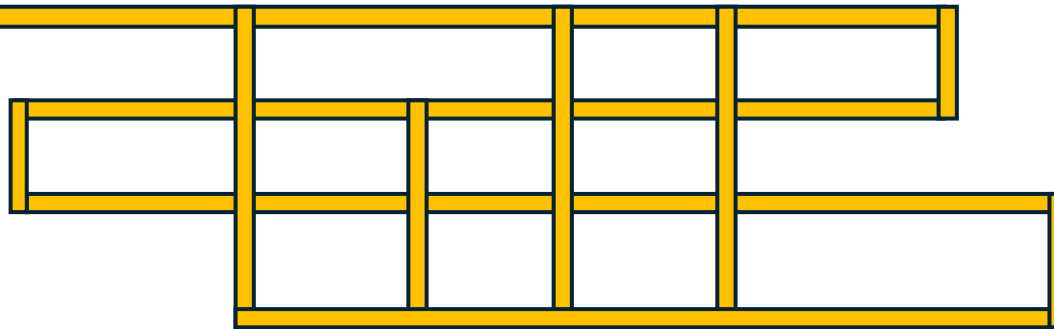
Approach 1
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**Transmission
Receipts**
100TJ ✓



Network Allocation

Retailer A	40TJ
Retailer B	65TJ
Retailer C	10TJ
Total	115TJ



**Biomethane
Receipts**
15TJ ✓

Scaled Allocation

Retailer A	34.8TJ
Retailer B	56.5TJ
Retailer C	8.7TJ
Total	100TJ

Scaled Allocation

Retailer A	5.2TJ
Retailer B	8.5TJ
Retailer C	1.3TJ
Total	15TJ

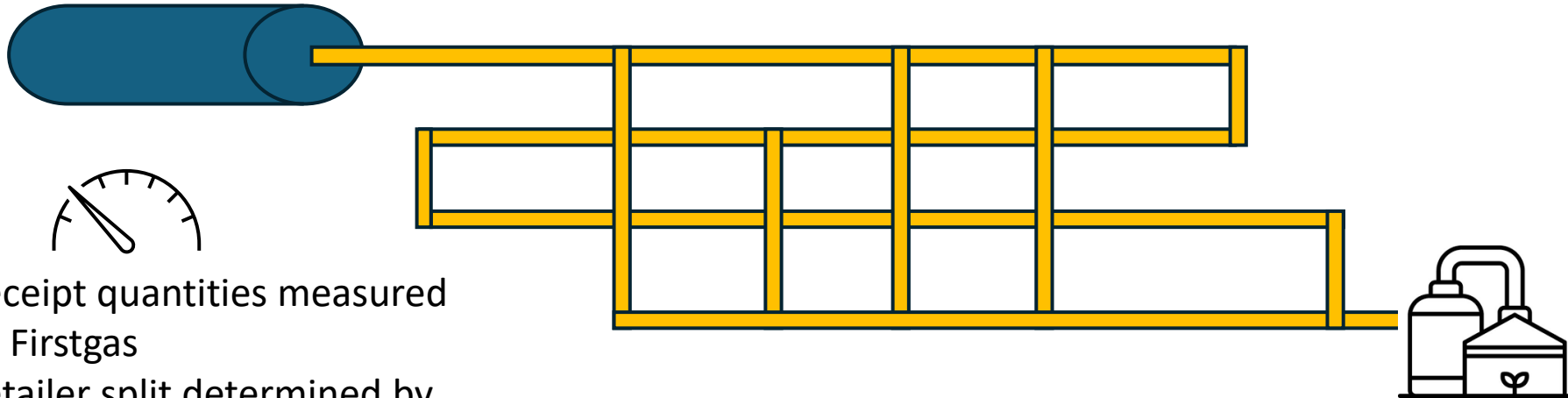
...this approach produces an allocation for each receipt point but doesn't cater for differences in contractual arrangements between retailers and producers

Example

Approach 1
Allocate network
volumes only

Approach 2
Scale allocations
to receipts

Approach 3
Allocate to
biomethane
injection first



- Receipt quantities measured by Firstgas
- Retailer split determined by Allocation Agent

Alternative approach: instead of the allocation agent allocating retailer quantities to the biomethane injection point, take these quantities as given, based on receipts, and require the producer to calculate each retailer's share of receipts based on contracts

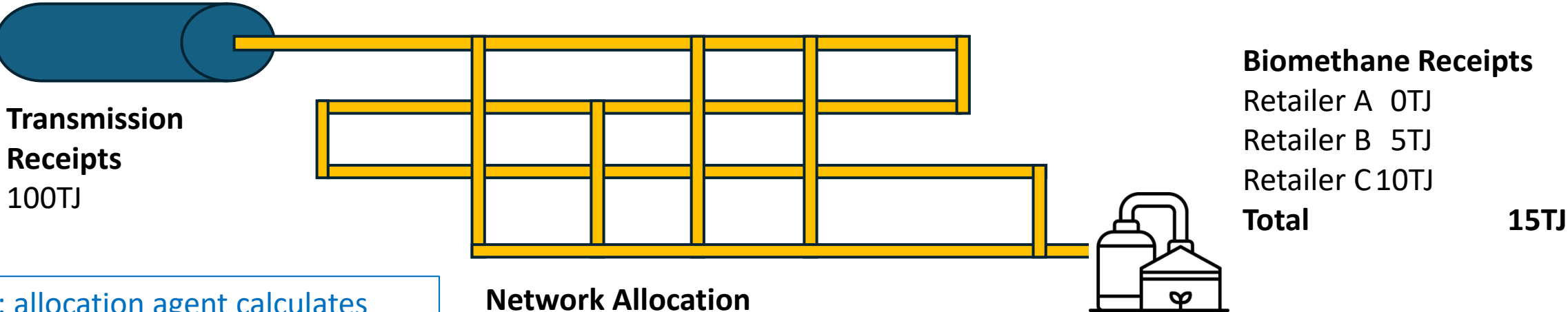
- Receipt quantities measured by biomethane producer
- Retailer split determined by biomethane producer

Example

Approach 1
Allocate network volumes only

Approach 2
Scale allocations to receipts

Approach 3
Allocate to biomethane injection first



Step 1: allocation agent calculates network allocation for each retailer
Step 2: allocation agent subtracts retailer's biomethane receipts (as notified by biomethane producer) from its network allocations
Step 3: the retailer's residual network allocation is its gas gate allocated quantity

Network Allocation	
Retailer A	40TJ
Retailer B	65TJ
Retailer C	10TJ
Total	115TJ

	Network allocation	Biomethane receipts	Gas gate allocation
Retailer A	40	0	40
Retailer B	65	5	60
Retailer C	10	10	0
Total	115	15	100

Example

Approach 1
Allocate network
volumes only

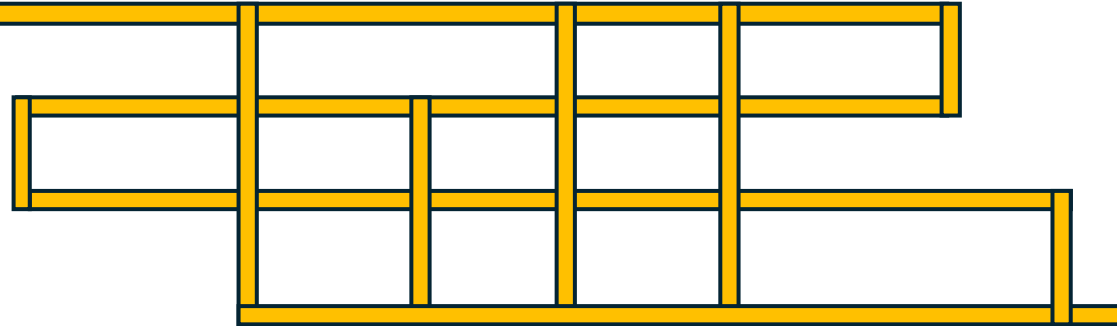
Approach 2
Scale allocations
to receipts

Approach 3
Allocate to
biomethane
injection first



Gas Gate Allocation

Retailer A	40TJ
Retailer B	60TJ
Retailer C	0TJ
Total	100TJ



Network Allocation

Retailer A	40TJ
Retailer B	65TJ
Retailer C	10TJ
Total	115TJ

Biomethane Receipts

Retailer A	0TJ
Retailer B	5TJ
Retailer C	10TJ
Total	15TJ



Scenario with retailer net positive biomethane

- What happens if a retailer receives more biomethane on a day than its downstream customers use?

Example

Approach 1
Allocate network
volumes only

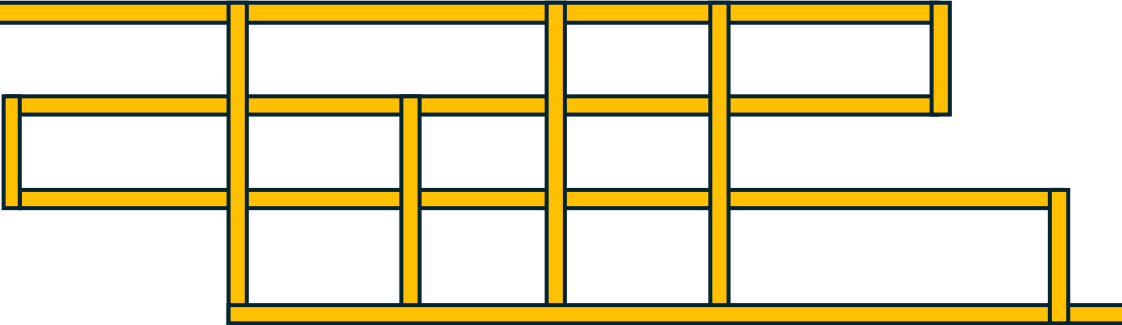
Approach 2
Scale allocations
to receipts

Approach 3
Allocate to
biomethane
injection first



Gas Gate Allocation

Retailer A	40TJ
Retailer B	65TJ
Retailer C	(5)TJ
Total	100TJ



Biomethane Receipts

Retailer A	0TJ
Retailer B	5TJ
Retailer C	10TJ
Total	15TJ

Network Allocation

Retailer A	40TJ
Retailer B	65TJ 70TJ
Retailer C	10TJ 5TJ
Total	115TJ

	Network allocation	Biomethane receipts	Gas gate allocation
Retailer A	40	0	40
Retailer B	70	5	65
Retailer C	5	10	(5)
Total	115	15	100

Scenario with retailer net positive biomethane

- What happens if a retailer receives more biomethane on a day than its downstream customers use?
 - Retailer A and retailer B have used 105TJ of transmission gas
 - Retailer C has (nominally) received 5TJ of biomethane into the transmission system
 - Net flow is 100TJ into the distribution system, which matches the metered quantity
- Is this approach feasible?

Implementation: renewable gas injection

- Timing & approach for design and development work
- System changes for GAA and D+1
- Changes for transmission?

Session 4: Advanced Gas Metering Infrastructure

AGMI: summary of rule changes

Rule	Title	Topic
Switching Rules		
Schedule 1, Part C	ICP parameters maintained by Meter Owners	Add communicating flag
5.2	Interpretation	Definition of allocation group

Rule	Title	Topic
Reconciliation Rules – allocation group changes		
6	Definition of allocation groups	Allocation group modifications
28A	Retailer to assign consumer installations to allocation groups	Assignment to allocation groups now references rule 6
29	Retailer to install metering	Consequent changes due to allocation group modifications
30	General requirements for provision of retailer consumption information	Consequent changes due to allocation group modifications
31-33	Provision of consumption information for initial/interim/final allocation	Changes to submission requirements

Rule	Title	Topic
Reconciliation Rules – allocation methodology		
25C	Determination of G1M gas gates	No rule change but change to allocation system required
45	Global method of allocation	Allocation groups 3 and 5 have annual UFG factor applied instead of monthly UFG factor
46	Calculation of UFG factor	Consequent change to calculation of monthly UFG factor

Points for discussion

- New concepts and definitions in the Rules
- Modified allocation groups
- Amendments to allocation methodology
- Communicating flag

Concepts & definitions

- Advanced meters are already defined in the Switching Rules
- No need for advanced meter definition in Reconciliation Rules, TOU meter covers it:

TOU means time of use;

TOU meter means a **meter** which has an associated datalogger to allow **register readings** or gas consumption to be recorded automatically at pre-determined intervals;

- Consequently no rule change needed for r25C (determination of G1M gas gates)

Allocation group definitions

- Proposed new drafting for allocation groups targets two issues:
 - Separation of daily-reconciled AGMI consumers from other mass market consumers,
 - Remove ambiguity in existing drafting
- Consumption volume thresholds are now made explicit
- Changes to rules 6, 28A, 29 and 30 ensure allocation groups are only defined and described in one place (rule 6.2)
- Metering installation and interrogation are handled separately in rule 29
- Retained existing AG3 & AG5 profiles

Allocation group definitions

6.2: The allocation groups are as follows:

Allocation group 1: Assigned to ICPs that **use more than 10TJ per annum and** have a TOU meter with telemetry and where gas quantities are recorded **and submitted to the allocation agent** daily:

Allocation group 2: Assigned to ICPs that **use more than 10TJ per annum and** have a TOU meter without telemetry and where gas quantities are recorded daily:

Allocation group 3: Assigned to ICPs:

(a) that use between 250GJ and 10TJ per annum and have a TOU meter and where gas quantities are recorded and submitted to the allocation agent daily; or

(b) where the daily gas quantities are determined by application of an approved static deemed profile to monthly gas quantities taken from register readings that are required under rule 29 to be recorded monthly:

Allocation group 4: Assigned to ICPs **that use between 250GJ and 10TJ per annum and** where the daily gas quantities are determined by application of the gas gate residual profile to monthly gas quantities taken from register readings that are required under rule 29 to be recorded monthly:

Allocation group 5: Assigned to ICPs:

(a) that use less than 250GJ per annum and have a TOU meter and where gas quantities are recorded and submitted to the allocation agent daily; or

(b) where the daily gas quantities are determined by application of an approved dynamic deemed profile to monthly gas quantities taken from register readings that are not required under rule 29 to be recorded monthly:

Allocation group 6: Assigned to ICPs **that use less than 250GJ per annum and** where the daily gas quantities are determined by application of the gas gate residual profile to monthly gas quantities taken from register readings that are not required under rule 29 to be recorded monthly.

Summary of modified allocation groups

Consumer size	Allocation group	Profile	Reconciliation type	D+1 reconciliation	UFG
>20TJ pa	1	XTOU	Daily metered	Daily subs, ICP-level	AUFG
>10TJ pa	1	XTOU	Daily metered	Daily subs, ICP-level	AUFG
	2	XTOU	Daily metered	Modelled, ICP-level	AUFG
>250GJ pa	3	AGMI	Daily metered	Daily subs, ICP-level	AUFG
		STOU	Daily (static) profiled	Modelled, ICP-level	AUFG
	4	GGRP	Monthly profiled	Modelled, gas gate-aggregated	MUFG
<250GJ pa	5	AGMI	Daily metered	Daily subs, gas gate-aggregated	AUFG
		STOU	Daily (dynamic) profiled	Modelled, gas gate-aggregated	AUFG
	6	GGRP	Monthly profiled	Modelled, gas gate-aggregated	MUFG

Amendments to allocation methodology

- Drafting to change the allocation methodology for AGMI is relatively minor.
- Modifications to rules 45.2.3 and removal of rule 45.2.4 address the change of UFG factor (MUFG to AUFG) for allocation groups 3 and 5.
- A small change is also required in rule 46 to move allocation groups 3 and 5 from the denominator to the numerator in the calculation of the monthly UFG factor.
- No change is required to rule 25C for the G1M proposal. The definition of TOU includes AGMI, so the existing drafting already incorporates AGMI load in the consideration of G1M gas gates.

Communicating flag

- Communicating field add to Schedule 1 Part C in Switching Rules (ICP parameters maintained by Meter Owners)

ICP parameters maintained by Meter Owners:

Meter Identifier

Meter Location Code

Meter Pressure

Register Multiplier

Meter operating at network pressure

Register Reading Digits

Standard Meter

Prepay Meter

Advanced meter

Communicating flag

TOU meter

Logger Owner

Corrector Owner

Telemetry Owner

Advanced Meter Owner

Metering Price Category

Implementation: AGMI

- Allocation group changes
 - Allocation group changes don't need a transition period, because retailers aren't required to use AG3 & AG5. Retailers can choose when to start using these allocation groups based on their own readiness
 - Allocation agent has to make some system changes (to GAA and to D+1) to accommodate AG3 & AG5. The first part of this project (design phase) is now underway.
- Communicating flag
 - Previous project to add metering fields to the gas registry took six months (including a data cleansing project for legacy data). What is a reasonable timeframe for the new project? Another working group required?

Session 5: Closing remarks

Immediate next steps

- Submissions on first draft of rule changes: **Friday 31 July 2026**