CODE REVIEW PROPOSAL No 0217
"Gemini Code Contingency Arrangements"
Version 1.0

Date: 10 June 2008

Nature and Purpose of Proposal

The existing Code Contingency Arrangements have been in place for a number of years without any significant review of their appropriateness being undertaken in that time. The Gemini failure in October 2007 highlighted to the industry the importance of having clear, accessible, well understood and tested contingency arrangements that reflect the differing needs and priorities of Users and Transporters.

This Review Group Proposal seeks to review prevailing Gemini Code Contingency Arrangements. We propose that the scope of this Review Group addresses two specific areas:

1. Review prevailing Code Contingency procedures in place for Gemini, given the experiences of October and consider the development of 'Guidelines' for Gemini specific Code Contingency arrangements.

2. Consider the benefits of including Code Contingency arrangements under the governance of the UNC Committee as a UNC related document.

Under prevailing arrangements Code Contingency communication arrangements are in place for many sections of the UNC. We believe that there is merit in exploring the benefits of introducing all Contingency documentation, including the entire suite of Code Contingencies communications, under the governance of the UNC Committee as a UNC-related document.

Code Contingencies relate to UK Link core processes for example, capacity and energy balancing (Gemini), Supply Point Administration (SPA) and Invoicing; Before-the-day communications are generally associated with SPA activities; After-the-day communications are generally associated with Invoicing activities; whereas within-day communications are generally undertaken within Gemini.

Gemini is dependent on certain aspects of SPA communications that are associated with data passed to Gemini in order to apply demand forecasts and RBD energy allocations. Failure of these communications, during a Code contingency may have an impact on the Gemini within-day processes. We understand that as part of the 'UK Link Refresh' Project it was recognised that a review of SPA contingency arrangements was due, and such a review is planned to take place in due course. We welcome the initiation of a review of SPA contingency processes and note that such a review is likely to run in parallel with the Gemini Contingency Arrangements Contingency Review Group Proposal.

We have considered whether it would be appropriate to include the SPA contingency review within the scope of this Gemini Review Group Proposal however, we believe that whilst there is an interaction between the respective areas, the issues and parties affected differ to such an extent that it would preclude a consolidated review.

© all rights reserved

This Review Group Proposal i.e. the proposed development of Gemini Contingency 'Guidelines', seeks to address those UK Link processes supported by Gemini as we believe that these hold the greatest commercial risk to the industry. We believe that the establishment of greater definition and clarity in respect of the Gemini processes will mitigate the risks associated to within-day information provision and operations, as well as providing information that may mitigate risks associated with other, UK Link Code Contingencies.

Any further information (Optional)

We believe that a review of the Code Contingency Arrangements for Gemini is required in order that greater clarity of operational roles and responsibilities are understood and resourced by all relevant parties.

In order to achieve greater industry ownership and awareness of the roles and responsibilities associated with all Code Contingency arrangements, we believe that such arrangements would benefit from being governed within the contractual Code framework of UNC governance.

Under the prevailing arrangements Gemini Contingency documentation is fragmented, sourced in several places and in some case out of date. We propose that the Review Group explores the development of a consolidated, single point of reference, 'Gemini Code Contingency Guidelines' document ('Guidelines'). We believe that these 'Guidelines' should provide comprehensive contingency information, which include the following items:

- All contingency processes and procedures
- Agreed testing policy - [bi-annual] test of the Code Contingency Arrangements, (consider arrangements similar to test runs for National Gas Deficit Emergency)
- Establish prioritisation guidelines for Code Contingency procedures
- Decision making arrangements associated with any proposed relaxation of the UNC rules (where required)
- A description of the contingency management, roles and responsibilities
- A description of the communication approach
- An overview of the business processes and linkage to the more detailed contingency arrangements
- A description of the post Gas Day contingency arrangements
- Publication of 'Guidelines' through the [Joint Office]Website

We propose that these 'Guidelines' are introduced as a UNC related document under the UNC section V12 and therefore governed under the framework of the UNC Committee. Such an arrangement may facilitate greater engagement and clarity of industry roles and responsibility during a Code Contingency.

Code Concerned, sections and paragraphs

Uniform Network Code

Transportation Principal Document

Section(s) U, V and the UK Link Manual

Proposer's Representative

© all rights reserved

Steve Pownall

Proposer

National Grid Transmission

© all rights reserved