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**Modification Proposal 0250 –
‘Introduction of Code Contingency Guidelines’**

Dear John,

Thank you for your invitation seeking representations with respect to the above Modification Proposal.

As the Proposer, National Grid Transmission supports this Modification Proposal.

We believe that during a Gemini system failure, the proposed changes to the UNC and the introduction of the Code Contingency Guidelines will provide greater clarity of obligations in respect of the forms of communications that should be adopted during a Code Contingency.

Providing greater definition of the UNC obligations associated with a Gemini Code Contingency and the introduction of a consolidated Code Contingency Guidelines document that; details Code Contingency processes and procedures; and, is published via a single and easily accessed site, may facilitate improvements, for both Users and Transporters, in respect of the ability to manage any risks associated with contractual/financial exposure which might arise as a consequence of being unfamiliar with Code Contingency Communications arrangements during a system failure.

During the Review Group 0217 – ‘Gemini Code Contingency Arrangements’ one of the principle concerns raised by the group was the community’s lack of familiarity and awareness of Code Contingency processes and procedures. The Review Group therefore recommended that a Gemini Code Contingency testing programme should be initiated on at least a biennial basis and, that the testing programme should require the mandatory participation of all Users. The work group agreed that the requirement for mandatory testing should ensure that all Users would become familiar with Code Communications required for the fulfilment of their contractual obligations during a Code Contingency.

We would like to take this opportunity to highlight that this Proposal largely reflects the Review Group’s recommendations including the mandatory requirement for all Users to participate in the scheduled testing programs. The obligation for User participation in Gemini

Code Contingency testing programmes is defined within the Guidelines under Chapter 4 Section 3.1.2, which states:

"3.1.2 The relevant Transporters, Transporters Agent and all UK Link Users that use Gemini will be required to participate in the Exercise."

As part of the UK Link Manual, the Code Contingency Guidelines are governed under the UNC Section U and therefore, all obligations detailed (if this Proposal is implemented) should be as robust as those defined within the UNC. The governance associated with making such changes to the UK Link Manual arrangements can be achieved in the absence of a UNC Modification; however a change to the Code Contingency Guidelines would require a UK Link Modification as defined in the TPD Section U; this would be voted on by the UK Link Committee, rather than directed by the Authority.

Please let me know if you require any further information to enable preparation of the Final Modification Report.

Yours sincerely

Claire Thorneywork