

Critical Contingency Management Regulations

Possible items that might need changing with a new code:

- TSO responsibilities
- Mentions of MPOC and VTC
- Mentions of OATIS
- Mentions of Downstream Reconciliation Rules

TSO has a number of specific responsibilities, all still valid under a single code

Each transmission system owner must:

- Provide information about the transmission system (regs 10 and 38)
- Prepare and maintain a critical contingency management plan (regs 24 and 33)
- Participate in the annual exercise (reg 34)
- During a critical contingency, comply with CCO directions and issue directions to retailers and large consumers (reg 54)
- If requested by the CCO, provide assistance in the preparation of incident and performance reports (reg 66)
- Calculate contingency imbalances (reg 75)

MPOC and VTC are specifically mentioned... but drafting includes other possibilities

- Definitions for MPOC and VTC include “..., as amended or replaced from time to time”
- Other mentions say “MPOC, VTC, and any other transmission system code...”
- Regulations workable under a new code, though amending to delete references to MPOC and VTC would be preferable

OATIS is similarly mentioned

- OATIS means the online interactive open access transmission information system, or any other replacement information system
- Reg 38: Each transmission system owner must ensure that the following information in relation to its parts of the transmission system is made available to the critical contingency operator, whether via OATIS or otherwise
- Reg 52: CCO must ... ensure an appropriate critical notice (as defined in OATIS) is posted on OATIS
- Again, workable as drafted, but amending would make it clearer

Downstream Reconciliation Rules used for calculating contingency imbalances

- Reg 74: a negative (positive) contingency imbalance means ... for a shipper, the amount by which that party and its consumers have or are considered to have, taking into account any allocation results under the Gas (Downstream Reconciliation) Rules 2008, in aggregate taken more (less) gas than the total gas which that party was contractually entitled to take
- If initial allocation changes in response to GTAC, this provision may need adjusting