
EMERGENCY PLAN

in accordance with Article 4 of Regulation No 994/2010 of the European Parliament and of the Council concerning measures to safeguard security of gas supply and repealing Council Directive 2004/67/EC

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CHAPTER 1: General Provisions

1. *Scope and Application*

a. This Emergency Plan (the 'Plan') was drafted in accordance with Regulation (EU) No 994/2010 of the European Parliament and of the Council of 20 October 2010 concerning measures to safeguard security of gas supply and repealing Council Directive 2004 /67/EC (L 295) (the 'Regulation') and in particular Articles 8 and 10 thereof, and in accordance with the provisions of Articles 12 and 73(1) of Law 4001/2011 and the Chapter 10 of NNGS Network Code, as in force.

b. The Plan aims, in particular, at:

- i. Determining the responsibilities, obligations and actions of the competent Ministry, the General Secretariat for Civil Protection, the Competent Authority, the Energy System Operators, the Natural Gas and Power Distribution System Operators, the Natural Gas Suppliers and the Major Customers of Natural Gas, in order to effectively address the supply disruption or the exceptionally high gas demand, which has resulted in a significant deterioration of supply in the Greek market of Natural Gas, in accordance with Article 10(3) of the Regulation;
- ii. Establishing procedures and measures to be followed for each crisis level in accordance with Article 10(3) of the Regulation; and
- iii. Establishing the information obligations imposed on Natural Gas Undertakings.

2. *Definitions*

The terms stated in this Plan will have the meaning attributed in Article 2 of Law 4001/2011 (Government Gazette A' 179 / 22.08.2011) and in Article 1 of the NNGS Network Code or in individual provisions of the Code, as in force, and the following terms will have the following meaning:

- Interruptible Customers: Major Customers, excluding those that consume Natural Gas for power production, which have concluded with their Supplier interruption agreement on annual basis, under which they at least bind (a) to interrupt the Natural Gas demand more than forty per cent (40%) of their daily demand, anytime and within six (6) hours after the request of their Supplier during an Alert Level (Alert Status 2) and (b) maintain a reduced level of demand as long as the crisis lasts and up to a maximum of thirty (30) days per year.

- Involved Parties (Parties): The supervisory Authorities, the Energy System Operators, the Natural Gas and Power Distribution System Operators as well as the energy market companies involved in the procedure of dealing with Emergencies and Crisis management, including the Natural Gas Suppliers, the NNGS Users and the Major Customers.
- Confirmed LNG Reserve for Balancing purposes: the sum of LNG Reserve for Balancing purposes in the tanks of the LNG Facility at the end of a Day D, plus the LNG Quantity for Balancing purposes the Operator is going to be supplied the Days D+1, D+2 and D+3, under Load Balancing Agreements concluded in accordance with the provisions in Article 47 of the NNGS Network Code.
- Confirmed LNG Users Reserve: the sum of LNG Reserve of LNG Users at the end of a Day D, as calculated by the Operator pursuant to the provisions of Article 77 of the NNGS Network Code, plus the LNG Load Quantity of LNG User(s) for which the Operator has received a Notice of Arrival, as provided for in Article 67(4) of the NNGS Network Code.
- Annual Quantity of Natural Gas Consumption: The Natural Gas quantity that refers to a Natural Gas Consumer and is calculated:
 - i. From the average of fuel consumption during the last two twelve-month periods that immediately proceed the year of calculation.
 - ii. For new facilities, from the date of commencement of their operation.
 - iii. For existing facilities that enhance their power, from the quantities calculated according to the above mentioned item (i) and the new installed power.
- Daily Gas Imbalance of the NNGTS: The difference between the sum of the Daily Natural Gas Delivery Quantities to the NNGTS on behalf of the Transmission Users and the Quantity of Natural Gas that was injected to the NNGTS by the Operator for Load Balancing purposes minus the sum of the Daily Natural Gas Off-take Quantities from the NNGTS on behalf of the Transmission Users.
- Crisis: any event which leads or may lead to an Alert Status 1 (Early Warning Level), an Alert Status 2 (Alert Level), or an Alert Status 3 (Emergency Level) as defined in Article 10 of the Regulation.
- Protected Costumers:
 1. Domestic Customers connected to a Natural Gas distribution network;

2. The following entities that provide essential social services, provided that they are connected to a Natural Gas distribution network:
 - i. Hospitals, units of primary, secondary and tertiary health care;
 - ii. School groups, crèches, nursery schools, schools of all grades;
 - iii. Airports;
 - iv. Fuel filling stations for public transport and waste disposal vehicles; and
 - v. Buildings which house public sector's authorities, as defined in Article 14(1) of Law 2190/1994 (A'/28);
3. All commercial and industrial consumers, as defined by the respective Gas Supply Companies or the gas suppliers, which are small and medium enterprises, as defined in accordance with the European Commission recommendation of May 6, 2003 (2003/361/EC) and with annual contracted consumption less than 10,000 MWh per year;
4. The district heating installations, to the extent that they provide heating to domestic customers and customers referred to in the points (1) and (2) above, provided that these installations do not have the capability of switching fuels and are connected either to a Natural Gas distribution network or to the Natural Gas Transmission Network.

3. Scope

The Plan will be implemented upon occurrence of situations which affect or might affect the smooth operation of the Greek Natural Gas market and/or security of supply, in accordance with the Regulation.

Crisis can be caused either by extrinsic or intrinsic risks, as detailed in the most recent Risk Assessment Report on the Security of Gas Supply in Greece (the 'Risk Assessment Report'), drawn up in accordance with the provisions of Article 9 of the Regulation and notified to the European Commission. Such situations include, but are not limited to, the following:

- Technical problems in the NNGS infrastructure;
- Technical problems in the infrastructure of Natural Gas suppliers and/or upstream interconnected systems;
- Sabotage at the NNGS facilities;
- Reduced or interrupted gas supply from third parties (especially Natural Gas Suppliers, Users, Operators of upstream interconnected systems, Independent Natural Gas System Operators);
- Unexpected high demand;
- Natural disasters;

- Long-term restrictions to Natural Gas supply; and
- Exit of Supplier from the market of Natural Gas.

4. Supply Standard

Article 8 of the Regulation establishes the Standard for Natural Gas supply of the energy markets in the Member States of the European Union.

In the context of the above Standard, the measures taken during periods of Crisis, as defined in the Regulation, aim at ensuring Natural Gas supply to Protected Customers in the following cases:

- i. extreme temperatures during a seven (7) day peak period occurring with a statistical probability of once in twenty (20) years;
- ii. any period of at least thirty (30) days of exceptionally high demand of Natural Gas, occurring with a statistical probability of once in twenty (20) years; and
- iii. for a period of at least thirty (30) days in case of the disruption of the single largest Natural Gas infrastructure under average winter conditions.

Additional cases, besides the above mentioned, may be examined and taken into account in the Risk Assessment Report.

5. Plan revisions

DESFA shall prepare and propose any amendment, modification or revision of the Plan in order to ensure its effectiveness, in compliance with the applicable provisions. Any amendment, modification or revision of the Plan shall be approved by RAE. The Plan and any revision thereof shall be communicated to the European Commission under RAE's responsibility.

CHAPTER 2: Obligations/Competences

1. Introduction

The following bodies are established for effective Crisis management and to deal with Emergencies:

- DESFA Crisis Management Unit (CMU);
- Crisis Management Group (CMG); and
- Coordination Committee of Emergency Measures (CCEM).

Below follows the determination of responsibilities and obligations of Crisis management bodies and their members in order to ensure their effective and timely response in the event of situations that could disrupt smooth supply of the Greek market with Natural Gas, taking into account both the provisions of Directive 2009/73/EC of the European Parliament and of the Council, of the Regulation 715/2009 of the European Parliament and of the Council, of the Regulation 994/2010 of the European Parliament and of the Council, and of the Law of 4001/2011, as in force, and legislative texts on the basis of the power conferred by the said law.

2. DESFA Crisis Management Unit

The DESFA Crisis Management Unit (CMU) comprises the following DESFA officers:

- Gas Operation, Maintenance & Transportation Services Division Director (CMU Head);
- Gas Market Management Department Manager;
- Gas Dispatching Manager;
- Regulated Services Trading Manager;
- NNGTS Operation and Maintenance Department Manager;
- LNG Department Manager; and
- Q&HSSE Department Manager;

or replacements to be designated by the CMU Head.

The CMU shall have the following mission:

- Monitor the supply and demand balance on the NNGS;
- Timely provide information to RAE, the CMG and CCEM, as applicable;
- Announce the Alert Status (Crisis level) as defined in Chapter 3 hereof;
- Make suggestion to RAE to convene the CMG or the CCEM;
- Make suggestions to the CMG or CCEM concerning the necessary measures,

- Implement the necessary actions to update the Plan; and
- Organize stress tests in the NNGS.

The CMU shall be convened by its Head (or his replacement), to assess information related to issues of emergency in the NNGS and/or security of gas supply to the country, and take measures if so required. In this case, RAE shall be informed in order to convene or assess the need to convene the CMG, in order to address situations that have led or may lead to a crisis of supply with Natural Gas. Depending on the crisis level, the CMU shall participate in the CMG and the CCEM.

3. Crisis Management Group

The Crisis Management Group (CMG) shall meet at the initiative of RAE and comprise representatives of RAE, DESFA CMU, and if deemed necessary by RAE, representatives of the IPTO and any Involved Party. The members to participate in the CMG are decided by RAE, as the case may be, taking into account the applicable Alert Status. The CMG shall have the following mission:

- Evaluate the recommendations of the CMU and the IPTO;
- Decide on measures for an Alert Status 3, save in cases where such a situation has been caused by a major accident in the NNGS; and
- Take measures to support supply of Natural Gas to neighboring countries (European Union Member States), or cooperation with European Union Member States, in accordance with Annex IV of Regulation No 994/2010 and Regulation No 715/ 2009.

The implementation of measures decided by the CMG will be binding in the Greek territory and will take place upon issue of a relevant order of the Involved, according to the case, Parties. The CMG shall also participate in the CCEM.

4. Coordination Committee of Emergency Measures

The Coordination Committee of Emergency Measures (CCEM) shall meet at the initiative of the competent Minister, on recommendation of RAE or DESFA, and shall consist of the CMG and the General Secretariat for Civil Protection. The CCEM shall have the following mission:

- Coordinate Government Services to address the consequences of a major accident in the NNGS, taking into account the current relevant instructions issued by General Secretariat for Civil Protection; and
- Decide to make a call for assistance from the European Union and its Member States.

The implementation of measures decided by the CCEM will be binding in the Greek territory, and will take place upon issue of a relevant order of the Involved, according to the case, Parties.

5. Crisis Levels – Responsibilities and obligations of the Involved Parties

The Crisis levels are determined in accordance with Article 10(3) of the Regulation. Below follows the determination of competences and responsibilities of the Crisis Management bodies on each of the three (3) Crisis levels:

5.1 Early Warning Level (Alert Status 1)

The Involved Parties and information flow at the Early Warning Level are shown in Chart 1 below.

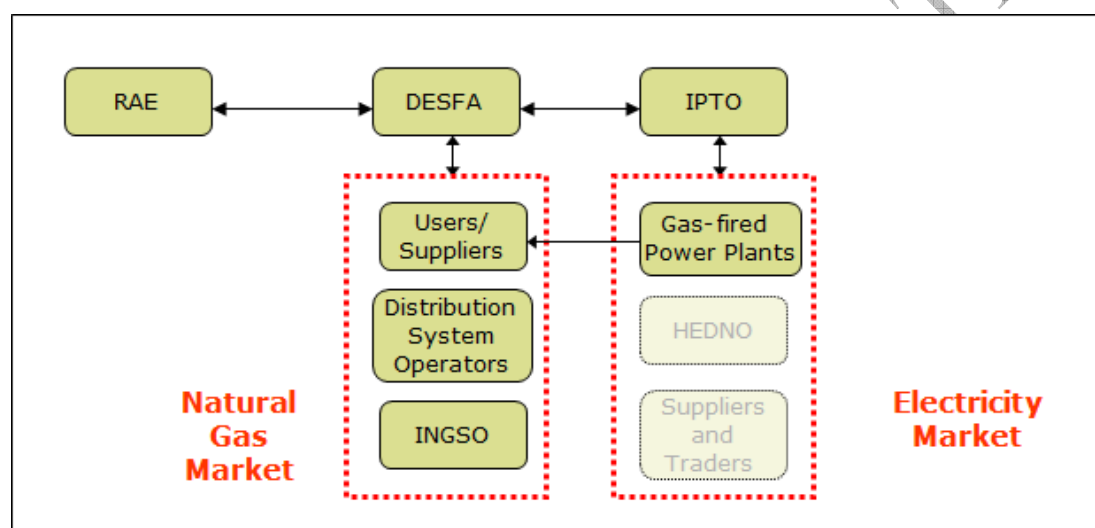


Chart 1: Involved Parties and information flow on the Early Warning Level

Table 1 below details the roles and responsibilities of the Involved Parties:

Organisation	Roles and responsibilities
RAE	It informs the competent department of the European Commission and the competent Ministry on the Crisis level. It monitors the balance of supply – demand based on data submitted by DESFA/CMU. It communicates information provided by the European Commission to DESFA/CMU.
DESFA/CMU	It collects and evaluates data and information from Users and upstream systems Operators. It establishes the balance of supply – demand for the next seven (7) days. It informs immediately all Involved Parties in relation to the upgrade/downgrade of the Crisis level.
IPTO	It makes estimates of the demand of Natural Gas plants, assesses the ability of alternative fuel in capacity and sends them to RAE and DESFA/CMU.
Users/Suppliers	They provide DESFA/CMU with estimates about future consumption and supply of Natural Gas, in the form and analysis determined by DESFA/CMU. They provide information about the possibility of limiting the Natural Gas demand in the following period, as part of demand response agreements concluded with Interruptible Consumers and Major Customers.
Distribution System Operators	They provide DESFA/CMU with estimates about future consumption of Protected Customers they serve, in the form and analysis determined by DESFA/CMU.

INGOs Operators	They provide DESFA/CMU with estimates about future Natural Gas consumption in the INGS they operate, in the form and analysis determined by DESFA/CMU.
Gas-fired Power Plants	They provide Users who serve them with assessments of future demand of their units, in the form and analysis determined by DESFA/CMU.

Table 1: Roles and responsibilities of Involved Parties on Early Warning Level

5.2 Alert level (Alert Status 2)

The Involved Parties and information flow on Alert Level are shown in Chart 2 below.

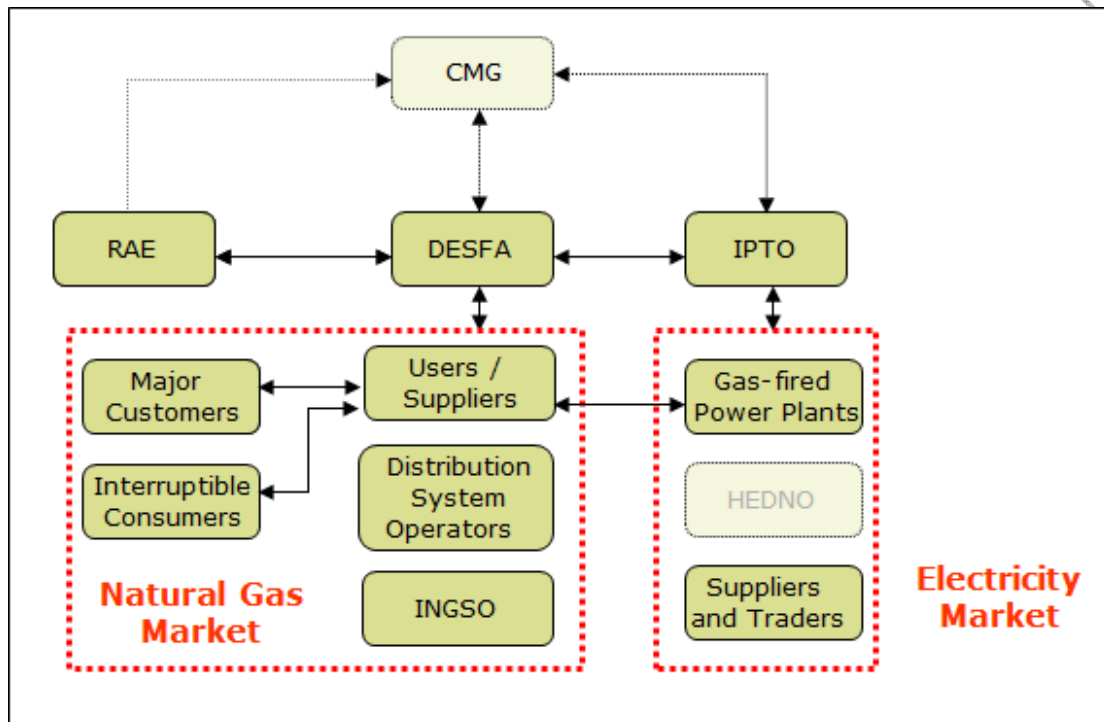


Chart 2: Involved Parties and information flow on Alert Level

Table 2 presents additional roles and obligations (in addition to those described in the previous paragraph) of the Involved Parties on occurrence of an Alert Level crisis.

Organisation	Roles and responsibilities
RAE	It monitors the balance of supply – demand and the effectiveness of market-based measures in managing the Crisis. It convenes the CMG if necessary.
DESFA/CMU	It establishes the balance of supply – demand for Natural Gas for the next seven (7) days, taking into account the market-based measures taken. It briefs RAE on a daily basis about the adequacy of market-based measures for the supply of Protected Customers and recommends the convening of the CMG if the measures are considered to be inadequate.
IPTO	It customizes the Natural Gas plants' dispatching plan, where necessary for their participation in a Natural Gas demand management mechanism.
CMG	It considers the need for non-market based measures to ensure the supply of Protected Customers.
Users/Suppliers	They request from the Interruptible Consumers to limit their demand at a level less than 60% of their daily demand within six (6) hours. They request from their Major Customers to reduce demand as set out in the demand response agreement. They take actions for increased deliveries of Natural Gas from alternative sources. They inform RAE and DESFA/CMU on the adoption of specific market-based measures and their relevant timeframe.

Gas-fired power plants	They implement the contractual term on demand response.
Interruptible Consumers	They limit their demand at a level less than 60% of their daily demand, within six (6) hours of receiving the relevant order by their Supplier.
Major Customers	They implement the contractual term on demand response.
Suppliers and Traders	They operate in the competitive electricity market for the introduction of additional quantities of energy through interconnections.

Table 2: Roles and responsibilities of Involved Parties on Alert Level

5.3 Emergency Level (Alert Status 3)

The Involved Parties and information flow on Emergency Level are shown in the following Chart 3.

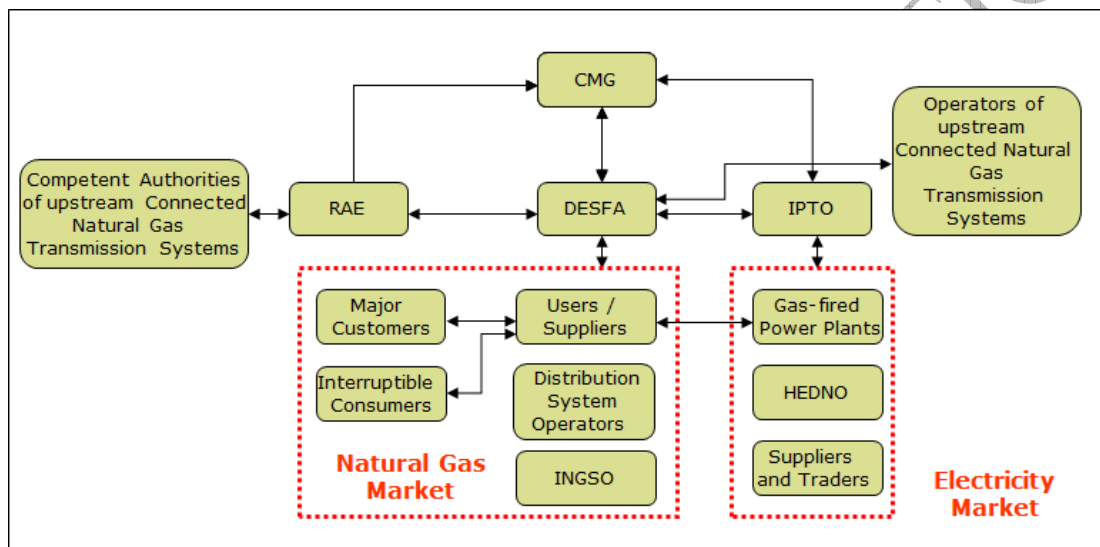


Chart 3: Involved Parties and information flow on Emergency Level

Table 3 presents additional roles and obligations (in addition to those described in the previous paragraphs) of the Involved Parties on occurrence of an Emergency Level Crisis.

Organisation	Roles and responsibilities
RAE	It convenes the CMG. It informs, if necessary, the Competent Authorities of the Members – States of the European Union, according to the Regulation 994/2010, that cover the Operators of the upstream Connected Natural Gas Transmission Systems. It suggests the convergence of CCEM, if necessary.
DESFA/CMU	It establishes the balance of supply – demand for the next seven (7) days, taking into account the market-based measures taken and determines the maximum quantity of Natural Gas that permitted to be received in a particular geographic area. It implements non-market based measures as decided by the CMG. It informs by any means, where applicable, the Operators of the Connected Natural Gas Transmission Systems and/or of the Natural Gas Distribution Systems as well as the involved Transmission and LNG Users. It suggests the convergence of CCEM, if necessary.
CMG	It decides the adoption of non-market based measures to ensure the supply of Protected Costumers.
IPTO	It participates in the decisions of the CMG, particularly in relation to NG supply limitations to gas-fired power plants. It issues the necessary dispatch orders to plants using alternative fuel.

Users/Suppliers	They take actions for increased deliveries of Natural Gas from alternative sources. They request their Major Customers, including the Interruptible Consumers, to reduce or interrupt demand on decision of the CMG issuance of a relevant order by DESFA/CMU.
Distribution System Operators	They make the necessary limitations to the Natural Gas demand on the networks they manage, upon the relevant decision of CMG.
INGS Operators	They implement measures to address emergencies/crises, following a decision of the CMG.
Natural gas power plants	They reduce their demand on orders provided by the User serving them, on decision of the CMG and a relevant order of the DESFA/CMU.
Major Customers (including the Interruptible Consumers)	They reduce their demand on orders provided by the User serving them, on decision of the CMG and a relevant order of the DESFA/CMU.
HEDNO	It makes the necessary limitations in demand for electricity.

Table 3: Roles and responsibilities of Involved Parties on Emergency Level

In a potential Emergency Level crisis whose management requires the activation of State mechanisms, for example in case of a major accident on the NNGS or where deliveries to Protected Customers must be limited, the Involved Parties and information flow are shown in the following Chart 4:

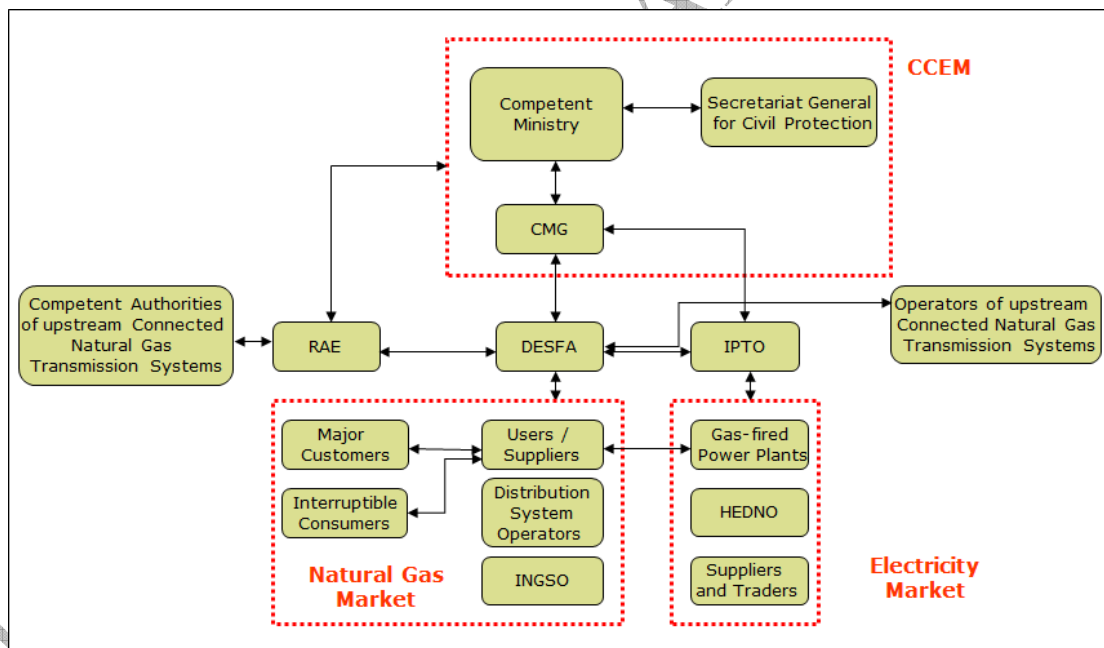


Chart 4: Involved Parties and information flow on Emergency Level

Table 4 on the next page shows the additional roles and responsibilities (in addition to those described in the previous paragraph) of the Involved Parties on occurrence of an Emergency Level crisis as a result of a major accident on the NNGS or having consequences on the supply of Protected Customers.

Organisation	Roles and responsibilities
RAE	It recommends the convening of the CCEM to the competent Minister. On decision of the CCEM, it makes a call for assistance from the European Union and its Members States.
DESFA/CMU	It recommends the convening of the CCEM to RAE or the competent Minister.
CMG	It participates into the CCEM.
CCEM	It coordinates the government agencies to address the Crisis or the accident, taking into account the recommendations of the CMG and DESFA/CMU. It decides to make a call for assistance from the European Union and its Member States.

Table 4

6. Information flow

All Involved Parties must immediately transmit to DESFA any information on situations that are expected to affect the smooth operation of the NNGS. Also, in the context of Plan implementation and if so required, they inform DESFA about any available information related to historical data and Natural Gas delivery/off-take estimates for the NNGS, long-term planning data, technical information about major consumers.

The Involved Parties must designate competent contact persons during Emergencies or Crises, and communicate the contact details to DESFA no later than two (2) weeks from adoption of this Plan. DESFA will see that a list of Involved Parties contacts is prepared and sent to the Involved Parties.

The availability of contact persons or their substitutes by any Involved Party should be ensured around the clock for each calendar day.

7. Development of scenarios

DESFA develops and analyses NNGS limited supply and extremely high Natural Gas demand scenarios. The aim is to provide information and evidence on the effectiveness of the established measures and the need to adopt new ones to deal with Emergencies/Crises, with a view to meet the demand for Natural Gas or, at worst, to comply with the supply Standard referred to in Chapter 1(4) hereof.

The need to revise the scenarios is considered on a monthly basis, taking into account the excess of the maximum daily consumption of natural gas seen on the National Natural Gas Transmission System (NNGTS) since its inception, as well as significant changes at the installations and operation of the NNGS.

The scenarios are revised under DESFA's responsibility.

8. Tests

The Plan is reviewed frequently and evaluated for effectiveness by performing tests.

Tests which provide for the involvement of the CMG are conducted at least once every year, under DESFA's responsibility. Tests which provide for the involvement of DESFA's CMU are conducted at least twice a year.

In planning the scheduled tests and with the aim of verifying effectiveness of the Plan, the CMU may require the Involved Parties to provide additional information, determining the time, in which such information should be available. The Involved Parties timely provide the information requested, classifying any confidential information accordingly. DESFA commits not to publish or disclose information classified by the providing Involved Party as confidential.

The CMU will provide detailed information to the Involved Parties participating in a test, designed as provided for in this section, and especially about the scenario of the test and their participation. The CMU will provide any clarification to the Involved Parties participating in the test, if so required.

After completion of the test, the CMU will prepare and communicate a relevant report to RAE, which may include, among others, proposals for the revision of this Plan.

UNOFFICIAL TRANSLATION

CHAPTER 3: Crisis Management Tools

1. Alert Statuses – Operations

1.1 Alert Status 0

The NNGS operates smoothly, without any restrictions to the available capacity of the system, and demand for Natural Gas (and the projected demand for each day over a period of seven (7) consecutive days) is met by the available amounts of Natural Gas at the Entry Points of the system. No adverse change is anticipated.

During periods of Alert Status 0, the DESFA CMU collects and evaluates information from Users, as specified in the applicable provisions on the NNGS and the Greek Natural Gas market in general. This information includes, among others, estimates of Users in connection with the Daily Natural Gas Off-takes and Deliveries at the NNGTS, and reports on LNG Cargo Unloading at the LNG Facility of Revythousa.

1.2 Alert Status 1

It is activated when there is specific, serious and reliable information that an incident may occur which is likely to result in a significant deterioration of the country's supply with Natural Gas, which is likely to lead to the activation of Alert Status 2 or Alert Status 3. The situation might have an adverse development (Early Warning).

- The CMU Head, if he considers that the information provided is reliable and serious, declares Alert Status 1 notifying all members of the CMU, and immediately informing RAE, the IPTO and all Users on the declared Alert Status 1 and the reasons that caused it.
- The CMU meets not later than twelve (12) hours from declaration of Alert Status 1, to collect further information in relation to the forthcoming incident, ensure a steady flow of information about the situation, take operating measures (if possible) to monitor the development of the situation and reassess the Alert Status.
- Under the responsibility of the head of the CMU, RAE will be informed on a daily basis by using any available means about the current situation and its likely outcome.

1.3 Alert Status 2

It is activated in case of supply disruption or extremely high demand for Natural Gas, resulting in a significant deterioration of supply, during which the market is still able to deal with that disruption or

demand without having to take measures that do not rely on the market. The situation develops adversely (Alert).

- The CMU Head evaluates the relevant information and if satisfied that there is evidence of transition to Alert Status 2, convenes the CMU and immediately informs RAE, the IPTO and all Users on the declared Alert Status 2 and the reasons that caused it.
- The CMU will meet not later than six (6) hours from the call of its Head, to collect further information in relation to the incident, ensure a steady flow of information about the development of the incident, take measures (as set out in this Plan, the NNGS Network Code, and the LNG transport and installation use contracts made by DESFA with the Users), to deal with or mitigate the effects of the incident and reassess the Alert Status.
- RAE convenes the CMG, if the balance projection will reasonably lead to the need for non-market based measures to ensure supply mainly to Protected Customers, specifying, where appropriate, the Involved Parties to participate in the meeting of the CMG.
- The CMG will meet at the Crisis Management Room of the Gas Control and Dispatching Centre of DESFA in Patima, Elefsina. The CMG evaluates the information presented by the CMU and the Involved Parties and considers the need for non-market based measures based on the expected scenario and the worst-case scenario of supply and demand development.
- During the meeting of the CMG, minutes are kept, which are certified at the end of the meeting by the participants. The minutes will also include the list of measures to deal with the effects that Alert Status 2 may have on the smooth supply of the Natural Gas market, if so prepared at the CMG meeting.

1.4 Alert Status 3

It is activated in the event of extremely high demand for gas, significant supply disruption and in the event that all relevant market-based measures have been implemented but the supply of Natural Gas is not sufficient to meet the remaining Natural Gas demand, resulting in the need for additional non market-based measures. The development is adverse and may cause disruption to the smooth supply of Protected Customers unless non market-based measures are taken (Emergency).

- The CMU Head evaluates the relevant information and if deemed that there is evidence of transition to Alert Status 3, he/she will convene the CMU.
- The CMU meets immediately and in all cases within two (2) hours from the call of its Head, to collect further information in relation to the incident, ensure a steady flow of information about

the development of the incident, take measures (as set out in this Plan, the NNGS Network Code and the LNG transport and installation use contracts made by DESFA with the Users), to deal with or mitigate the effects of the incident and reassess the Alert Status.

- On decision of the CMU, the head of the CMU will declare Alert Status 3 and RAE will be immediately informed about the current situation and its potential outcome, as well as of any measures already taken by the Operator in execution of its duties, as set out in the NNGS Network Code. RAE convenes the CMG within four (4) hours of declaration of Alert Status 3 specifying, where appropriate, the Involved Parties to participate in this meeting.
- The CMG meets at the Crisis Management Room of the Gas Control and Dispatching Centre of DESFA in Patima, Elefsina. The CMG evaluates the information presented by the CMU and the Involved Parties and decides on measures (other than those already taken by DESFA) to deal with the incident.
- During the CMG meeting minutes are kept which are certified by the participants at the end of the meeting, and include a list of measures to deal with the consequences brought on by Alert Status 3 on the smooth supply of the Natural Gas market and the safe operation of NNGS.
- Upon completion of the meeting and on decision of the CMG, the CMU Head informs immediately in any expedient manner the Involved Parties and Users which are or may be affected by Alert Status 3, stating the reasons which caused it, its effects and estimated duration.
- The CMU closely monitors the implementation of the measures and evaluates their effectiveness and daily draw brief reports which are communicated to the CMG members.
- After resetting the status to Alert Status 0, DESFA prepares a report on the incident, as set out in Article 65 of the NNGS Network Code.

2. Measures to deal with Alert Status

2.1 Measures to deal with/ manage an Alert Status 1

To deal with an Alert Status 1, the planned measures aim at the immediate mobilization of all participants in the Natural Gas market in order to avoid an upgrade of the alert level and to restore Alert Status 0 as soon as possible. In particular the measures taken are:

- Immediate notification of all NNGS Users by the CMU on declaration of Alert Status 1 and the reasons that caused it.

- Regular contact of the CMU with Transmission and/or LNG Users (within fourteen (14) hours from occurrence and on a daily basis thereafter).
- Regular information (on daily basis) to RAE regarding the development of the incident.
- Contacts of the CMU with Natural Gas Suppliers and Major Customers.
- Provision, by IPTO to RAE and DESFA, of estimated demand of gas-fired power plants and assessment of the ability of using alternative fuel in power production.
- Provision with estimates of the future Natural Gas consumption and supply to the CMU by the Users. Provision to the CMU with estimates of the future consumptions of Protected Customers by the Distribution System Operators / Suppliers serving them.
- Provision, by Natural Gas Suppliers to CMU, with information referring to the possibility of limiting the Natural Gas demand during the following period, as part of demand response agreements concluded by the latter with Interruptible Consumers and Major Customers.

2.2 Measures to deal with/manage Alert Status 2

To deal with an Alert Status 2, the planned measures aim at the immediate mobilisation of all participants in the Natural Gas market in order to avoid an upgrade of the alert level by implementing only market based measures and to restore Alert Status 1 or 0 as soon as possible. In particular, the measures that may be taken are:

- Immediate notification of all NNGS Users on declaration of Alert Status 2 and the reasons that caused it.
- Regular communication of the CMU with Transmission Users and/or LNG Users and Natural Gas Suppliers that serve Interruptible Consumers (within eight (8) hours from occurrence and on a daily basis thereafter).
- Increase of Deliveries through pipeline Gas Supply Agreements.
- Increase of deliveries through LNG Agreements upon timely notice to the producer/supplier.
- Additional Capacity of LNG Regasification on a short-term basis.

- Reduced Off-takes through Natural Gas demand response agreements between Suppliers and Interruptible Consumers and/or Major Customers.

2.3 Measures to deal with/manage Alert Status 3

To address an Alert Status 3, the planned measures aim at the continued meeting of residual demand and especially the supply of Protected Customers. In particular the measures taken – individually or cumulatively – are:

- Compulsory interruption/limitation of demand from Customers, according to the Priority List of Annex 1 hereto.
- Stand-by Natural Gas Supply Agreements for Operator balancing purposes.
- Mandatory re-gasification, by the Operator of LNG User or Users, of LNG Quantities that are temporarily stored in the Revythoussa LNG Facility exclusively for the service of Protected Customers.
- Submission by RAE of a call for assistance from the European Union or its Member States.

The adoption of the appropriate measures is decided by the CMG which will assign the Involved Parties with the implementation of the adopted measures, per area of responsibility. In cases where immediate action is required for the safe operation of the NNGS, the safety of human life or property, the relevant measures will be adopted by decision of the CMU.

2.4 Measures taken by the IPTO within the CMG

The IPTO will inform the CMG on the possibility of restoring adequate reserve margins in the electricity production system, after a loss of capacity as a result of measures taken to manage an Alert Status 2 or 3. The feasibility and effectiveness of the following actions will be considered among other things:

- Postponement of scheduled maintenance of power plants using fuel other than Natural Gas.
- Increase of power generation from plants using lignite.
- Increase of power generation from hydro plants.
- Dispatch order to gas – fired power plants using alternative fuel.
- Emergency power imports.

- Reduction/ interruption of power exports, provided that this does not compromise smooth supply to Protected Power Consumers in European Union Member States.

3. Activation of Alert Status – Involved Parties – Measures

The CMU Head will activate the appropriate alert status upon occurrence of any of the following incidents, when in his/her opinion this affects or could affect the smooth and secure supply of the country with Natural Gas, and provide relevant documentation to RAE.

A. Delivery at an Entry Point of a Natural Gas Quantity equal to or less than 80% of that nominated, and Delivery Pressure less than the Minimum Entry Pressure, for a period equal to or greater than two (2) consecutive Days.

- i. Where the Daily Gas Imbalance of the NNGTS is greater than or equal to zero, the CMU Head declares Alert Status 1.

Involved Parties: DESFA, RAE, Transmission Users who have booked Delivery Transmission Capacity at the Entry Point, Suppliers delivering Natural Gas at the said Entry Point, Operators of upstream Transmission Systems.

Measures: The involved Users and Suppliers will submit to the CMU, within twelve (12) hours after sending a relevant request, a report on the causes of Alert Status 1, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 2 or 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. The involved Users and Suppliers must immediately notify the CMU of any detail or information which may lead to a change in the Alert Status, by using any expedient means. DESFA will communicate with operators of upstream Systems (where appropriate) in order to be informed about issues which may affect the progress of the Alert Status, and inform RAE on a daily basis.

- ii. Where the Daily Gas Imbalance of the NNGTS is less than zero, and demand can be met and only market-based measures need to be taken, the CMU Head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users who have booked Delivery Transmission Capacity at the Entry Point, Suppliers delivering Natural Gas at the said Entry Point, Operators of upstream Transmission Systems.

Measures: The involved Users and Suppliers will submit to the CMU, within six (6) hours after sending a relevant request, a report on the causes of Alert Status 2, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. The involved Users and Suppliers must immediately notify the CMU of any detail or information which may lead to a change in the Alert Status, by using any expedient means. The Operator will communicate with Operators of upstream Systems in order to be informed about issues which may affect the progress of the Alert Status. The Operator will assess the possibility of dealing with Alert Status 2 by injecting Balancing Gas. For this purpose, it will communicate with Suppliers or potential Suppliers of Balancing Gas to determine the level of availability of Balancing Gas in the coming Days. The CMU will as soon as possible inform RAE about the current Alert Status 2. The CMU will send on a daily basis a report to RAE, on the development of the Alert Status. RAE will consider the available facts and decide to convene the CMG, specifying the Parties which will participate in the relevant meeting. At its meeting, market-based measures other than those specified in the aforementioned reports may be discussed, to restore Alert Status 0.

- iii. Where the Daily Gas Imbalance of the NNGTS is less than zero, and demand may not be met without the need for non market-based measures, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution System Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4.

B. Natural Gas Off-take at a quantity greater than or equal to 120% of that nominated, for a period greater than or equal to two (2) consecutive Days.

- i. Where the Daily Gas Imbalance of the NNGTS is greater than or equal to zero, the CMU Head declares Alert Status 1.

Involved Parties: DESFA, RAE, Transmission Users submitting inaccurate Daily Nominations, Major Customers.

Measures: The involved Users will submit to the CMU, within twelve (12) hours after sending a relevant request, a report on the causes of Alert Status 1, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 2 or 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. The involved Users must immediately notify using any expedient means the CMU of any detail or information which may lead to a change in the Alert Status. The CMU may directly contact Major Customers, whose Natural Gas intakes lead to the aforementioned deviations, in order to gather the required information on the causes of Alert Status 1 and the estimated time to Alert Status change. The CMU will inform RAE on a daily basis.

- ii. Where the Daily Gas Imbalance of the NNGTS is less than zero, and demand can be met and only market-based measures need to be taken, the CMU Head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users submitting inaccurate Daily Nominations, Major Customers.

Measures: The involved Users will submit to the CMU, within six (6) hours after sending a relevant request, a report on the causes of Alert Status 2, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) until the Alert Status changes. The involved Users must immediately notify using any expedient means the CMU of any detail or information which may lead to a change in the Alert Status. The CMU may (if deemed necessary) directly contact Major Customers, whose Natural Gas intakes lead to the aforementioned deviations, requesting information on the causes of Alert Status 2 and the estimated

time to restore Alert Status 0. The Major Customers will send the relevant information to the CMU within three (3) hours from dispatch of the relevant request from the CMU. The Operator will assess the possibility of dealing with Alert Status 2 by injecting Balancing Gas. For this purpose, it will communicate with Suppliers or potential Suppliers of Balancing Gas to determine the level of availability of Balancing Gas in the coming Days. The CMU will as soon as possible inform, RAE about the current Alert Status 2. The CMU will send on a daily basis a report to RAE, on the development of the Alert Status. RAE will consider the available facts and decide to convene the CMG, specifying the Involved Parties which will participate in the relevant meeting. At its meeting, market-based measures other than those specified in the aforementioned reports may be discussed, to restore Alert Status 0.

- iii. Where the Daily Gas Imbalance of the NNGTS is less than zero, and demand may not be met without the need for non market-based measures, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution System Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4.

C. Confirmed LNG Users Reserve less than or equal to four times the Average Daily LNG Quantity that gasified and injected into the NNGTS during the immediately preceding four (4) Days.

- i. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is less than the Booked Transmission Capacity at the pipeline Entry Points, , the CMU Head will declare Alert Status 1.

Involved Parties: DESFA, RAE, LNG Users, Transmission Users having booked Transmission Capacity at the Entry Point 'Agia Triada'.

Measures: The involved Users will submit to the CMU, within twelve (12) hours after sending a relevant request, a report on the causes of Alert Status 1, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 2 or 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. The involved Users must immediately notify using any expedient means the CMU of any detail or information which may lead to a change in the Alert Status. The CMU will inform RAE on a daily basis.

- ii. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is greater than the Booked Transmission Capacity at pipeline Entry Points, and demand can be met only by taking market-based measures, the CMU Head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, LNG Users, Transmission Users having booked Transmission Capacity at the Entry Point 'Agia Triada', Transmission Users having booked Transmission Capacity at pipeline Entry Points.

Measures: The involved LNG Users and Transmission Users having booked Transmission Capacity at the Entry Point 'Agia Triada' will submit to the CMU, within six (6) hours after sending a relevant request, a report on the causes of Alert Status 2, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. The aforementioned Users must immediately notify using any expedient means the CMU of any detail or information which may lead to a change in the Alert Status. The CMU will contact (if necessary) Transmission Users which have booked Transmission Capacity at pipeline Entry Points, in order to determine whether additional quantities of Natural Gas can be delivered through those Points, so that the Confirmed LNG Stock is retained at a level higher than twice the Average Daily Quantity of LNG re-gasified and injected into the NNGTS during the immediately preceding four (4) Days. Transmission Users which have booked Transmission Capacity at pipeline Entry Points will send the relevant information to the CMU, within three (3) hours from

dispatch of the relevant request from the CMU. The CMU will as soon as possible inform RAE about the current Alert Status 2. The CMU will send on a daily basis a report to RAE, on the development of the Alert Status. RAE will consider the available facts and decide to convene the CMG, specifying the Involved Parties which will participate in the relevant meeting. At the CMG meeting, market-based measures other than those specified in the aforementioned reports may be discussed, to restore Alert Status 0.

- iii. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is greater than the Booked Transmission Capacity at pipeline Entry Points, and demand cannot be met without the need for non market-based measures, the CMU head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution System Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4.

D. Confirmed LNG Reserve for Balancing purposes less than or equal to four times the Average Daily Quantity of Balancing Gas injected into the NNGTS during the immediately preceding four (4) Days.

- i. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is less than or equal to the Daily Natural Gas Delivery at the NNGTS, as estimated by the Operator, at the NNGTS, the CMU Head will declare Alert Status 1.

Involved Parties: DESFA, RAE, LNG Suppliers for Balancing purposes, Transmission Users.

Measures: The involved Suppliers will submit to the CMU, within twelve (12) hours after sending a relevant request, a report on the causes of Alert Status 1, the measures taken or planned to be taken in order to prevent a possible development to Alert Status 2 or 3, and the actions taken or planned to be taken in order to restore Alert Status 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Alert Status changes. LNG Suppliers for Balancing purposes must immediately notify using any expedient means the CMU of any detail or information which may lead to a change in the Alert Status. Transmission Users will submit to CMU, by 18:30 on each Day, estimates of the Daily Natural Gas Deliveries/Off-takes over the next three (3) Days, identifying possible factors which could lead to a Daily Load Imbalance. The CMU will inform RAE on a daily basis.

- ii. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is greater than the Daily Natural Gas Delivery at the NNGTS, as estimated by the Operator, and demand can be met only by taking market-based measures, the CMU head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, LNG Suppliers for Balancing purposes, Transmission Users.

Measures: The involved Transmission Users will submit to the CMU, within six (6) hours from dispatch of a relevant request, a report on the estimated Natural Gas Deliveries/ Off-takes over the next three (3) Days, pointing out any factors which might cause a Daily Load Imbalance and specifying the amount thereof, for each Day of the aforementioned three-day period. The aforementioned report will be submitted by 18:30 on each Day to the CMU, until change of the Alert Status. The CMU will contact (if necessary) LNG Suppliers for Balancing purposes, in order to determine whether Balancing Gas Quantities can be delivered, so that the Confirmed LNG Reserve for Balancing purposes is retained at a level higher than twice the Average Daily Quantity of Balancing Gas injected into the NNGTS during the immediately preceding four (4) Days. The CMU will as soon as possible inform RAE about the current Alert Status 2. The CMU will send on a daily basis a report to RAE, on the development of the Alert Status. RAE will consider the available facts and decide to convene the CMG, specifying the Involved Parties which will participate in the relevant meeting. At the CMG meeting, market-based measures may be discussed, to restore Alert Status 0.

- iii. Where the Daily Natural Gas Off-take by the NNGTS, as estimated by the Operator, is greater than the Daily Natural Gas Delivery at the NNGTS, as estimated by the Operator, and demand cannot be met without the need for non market-based measures, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution System Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4.

E. Inability to settle Daily User Nominations due to technical problems at the NNGS.

In the event of an incident due to a technical problem in the NNGS, the staff of DESFA will take all efforts and make all suitable operations to mitigate or eliminate the consequences of the incident, according to, if necessary, the relevant instructions issued by the General Secretariat for Civil Protection.

- i. When demand can be met without the need for non market-based measures, the CMU Head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, Users, Interruptible Consumers, Major Customers directly connected to the NNGTS.

Measures: The CMU will, within six (6) hours from declaration of Alert Status 2, inform the other Involved Parties about the NNGS technical problem which caused Alert Status 2, as well as about the estimated time for restoration, proposing market-based measures to mitigate the effects of Alert Status 2.

- ii. When demand cannot be met without taking non market-based measures, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, affected Transmission Users, affected LNG Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution Systems Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4. Failure to comply with the above procedure due to the nature of the technical problem, DESFA will immediately interrupt supply to consumers, according to the Priority List of Annex 1 hereto, in order to ensure safe operation of the NNGS and the continued supply of Protected Customers.

F. Distribution System Emergency.

In the event of an incident due to extraordinary circumstances in a Natural Gas Distribution System, the staff of the Distribution System Operator will take all efforts and make all suitable operations to mitigate or eliminate the consequences of the incident, according to, if necessary, the relevant instructions issued by the General Secretariat for Civil Protection.

When measures must be taken in the NNGS to deal with an emergency situation that occurs in a distribution system, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users delivering Natural Gas to the distribution network, Distribution System Operator involved in an emergency situation.

Measures: The Distribution System Operator will immediately take all expedient measures referred to the Emergency Manual for its distribution network, and inform the CMU and RAE using any expedient means about the measures to be taken at the NNGS to deal with the emergency. The CMU will take the measures recommended by the Distribution System Operator.

G. Exit of Supplier from the Greek market of Natural Gas.

- i. In case of inability to supply Major Customers, the CMU Head will declare Alert Status 1.

Involved Parties: DESFA, RAE, Natural Gas Suppliers, Transmission Users, affected Major Customers.

Measures: The involved Major Customers will submit to the CMU, within twelve (12) hours from dispatch of a relevant request, a report on their status of supply with Natural Gas and the measures they have taken or plan to take to ensure smooth supply of their facilities. The involved Major Customers must immediately notify using any expedient means the CMU of any detail or information which may lead to Alert Status 0. The Natural Gas Suppliers will notify the CMU within six (6) hours from submission of a relevant request (by the CMU) of their ability to supply the Greek market with additional Quantities of Natural Gas, specifying the size of said quantities and the duration of supply. The CMU will inform RAE about the shortage in the supply of Natural Gas, the additional Quantities which can be made available by Natural Gas Suppliers, and the period of availability. The CMU will post on DESFA's website a list of Natural Gas Suppliers which may supply the market with additional quantities of Natural Gas.

- ii. In case where supply is ensured to Customers which are not Major Customers, upon intervention of DESFA as set out in Article 30(6)(1) of the Licensing Regulation, (Government Gazette 464/19.04.2010), as in force, the CMU Head will declare Alert Status 2 on decision of the CMU.

Involved Parties: DESFA, RAE, Natural Gas Suppliers, Transmission Users, affected Major Customers.

Measures: The CMU will inform RAE determining the size of shortage in supply, and implement the provisions of Article 30(6) of the Licensing Regulation (Government Gazette 464/19.04.2010).

- iii. In case of inability to supply Customers which are not Major Customers, the CMU Head will declare Alert Status 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, Natural Gas Suppliers, Operators of upstream Transmission Systems, IPTO, Interruptible Consumers, Major Customers, Distribution System Operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Alert Status 3 and its considerations regarding this development. RAE will convene the CMG within four (4) hours of receiving the relevant notice from the CMU. The CMG meeting will be attended by IPTO and any Involved Parties whose participation is considered necessary by RAE. During the meeting, the CMU (in collaboration with IPTO, where the operation of power plants is affected) will propose those non market-based measures which must be taken to mitigate the effects of Alert Status 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of Natural Gas supply to consumers, their implementation will be made in accordance with the procedures of Annexes 2, 3 and 4.

UNOFFICIAL TRANSLATION

ANNEX 1: PRIORITY LIST FOR INTERRUPTION OF NATURAL GAS SUPPLY IN AN EMERGENCY

The necessary interruption/limitation of Natural Gas supply to consumers is the key measure to manage an alert status 3 in order to ensure the reliable and safe operation of the NNGS, and the supply of residual demand and in particular of Protected Customers, and to limit impacts on the Power Transmission System.

The CMG, on recommendation of the CMU, decides to interrupt/limit Natural Gas supply to Customers in the following order of priority:

- Interruptible Consumers.
- Licensed Power Producers using Natural Gas.
- Natural Gas Consumers in the following order of interruption:
 - i. Major Industrial Consumers with Annual Quantity of Natural Gas Consumption greater than 100 GWh, which use the Natural Gas as raw material for the production of caloric fluids (e.g. steam) and Heat and Power cogeneration.
 - ii. Major Industrial Consumers with Annual Quantity of Natural Gas Consumption greater than 100 GWh, which use the Natural Gas for processes (furnaces, etc.).
 - iii. Small Industrial Consumers with Annual Quantity of Natural Gas Consumption equal to or less than 100 GWh, which are not Protected Customers and use the Natural Gas as raw material for the production of caloric fluids (e.g. steam) and Heat and Power cogeneration.
 - iv. Small Industrial Consumers with Annual Quantity of Natural Gas Consumption equal to or less than 100 GWh, which are not Protected Customers and use the Natural Gas for processes (furnaces, etc.).
 - v. Commercial Consumers that are not Protected Customers, according to the Emergency Plan of the Natural Gas Distribution System Operator.
- Protected Customers whose interruption/limitation is considered necessary to ensure reliable and safe operation of the NNGS and the distribution networks, according to the Emergency Plan of the respective Distribution System Operator.

Under the responsibility of the Transmission Systems Operators and the Distribution System Operators, a list per Consumer category according to items (i) up to (v) above is drawn up.

Under their responsibility, Large Customers may be Interruptible Consumers under the No. 344/2014 resolution of RAE, as in force, by submitting a written statement to DESFA. DESFA keeps Registry of Interruptible Consumers. DESFA does not enter in the Registry those Customers who: (a) do not belong to the category of Large Customers or (b) consume Natural Gas for power production. The Large Customers, who have registered in the Registry of Interruptible Consumers kept by DESFA, are obliged to submit to the Operator on a monthly basis information about their interruption.

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ANNEX 2: SUPPLY INTERRUPTION/LIMITATION PROCEDURE TO INTERRUPTIBLE CONSUMERS

To alleviate the Alert Status 3 consequences and in order to ensure reliable and safe operation of the NNGS, the interruption/limitation of Natural Gas supply to Interruptible Consumers may be required.

The CMU assesses the supply of Natural Gas at regular intervals to check whether the Natural Gas demand, as estimated by DESFA, is met. The CMU, by using historical data of Natural Gas demand, the Natural Gas nominations and estimations of the Natural Gas Transmission Users, the Natural Gas Distribution System Operators and the IPTO in the forthcoming period, develops and considers, through hydraulic simulation, scenarios of Natural Gas Deliveries/Off-takes in the NNGS, identifying any mass imbalance in the forthcoming period.

Then, if considered necessary by the above analysis, and in order to eliminate the daily Natural Gas Delivery/Off-take mass balance deficit and mitigate the Emergency (Alert Status 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU determines:

- the maximum daily limitation (up to interruption) of the Natural Gas supply to the Interruptible Consumers (in MWh of Natural Gas), taking into account relevant information provided by the Suppliers serving them; and
- the estimated duration of Alert Status 3.

The CMG decides to interrupt/limit the Natural Gas supply to Interruptible Consumers, on recommendation of the CMU, or requests alternative interruption/limitation scenarios to be considered by the CMU. Unless the CMG members agree on the measures to be taken, the final decision is made by the representative of RAE.

To implement the above decision, DESFA issues and sends a relevant Operational Flow Order to the Transmission User(s) that serve the Natural Gas Suppliers of the Interruptible Consumers to which Natural Gas supply will be interrupted/limited, in accordance with the provisions of Article 65 and Annex III of the NNGS Network Code.

ANNEX 3: PROCEDURE OF NATURAL GAS SUPPLY INTERRUPTION/LIMITATION TO GAS-FIRED POWER PLANTS

If the measures for the limitation of the Natural Gas supply to Interruptible Consumers are not sufficient to mitigate the consequences of Alert Status 3, and in order to ensure the reliable and safe operation of the NNGS, the interruption/limitation of Natural Gas supply may be required to licensed electricity producers using Natural Gas.

The CMU assesses the supply of Natural Gas at regular intervals to check whether the Natural Gas demand, as estimated by DESFA, is met. The CMU, by using historical data of Natural Gas demand, the Natural Gas nominations and estimations of the Natural Gas Transmission Users, the Natural Gas Distribution System Operators and the IPTO in the forthcoming period, develops and considers, through hydraulic simulation, scenarios of Natural Gas Deliveries/Off-takes in the NNGS, identifying any mass imbalance in the forthcoming period.

Then, if considered necessary by the above analysis, and in order to eliminate the daily Natural Gas Delivery/Off-take mass balance deficit and mitigate the Emergency (Alert Status 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU determines:

- the geographical area where limitation/interruption of Natural Gas supply is required. It is indicatively mentioned that the NNGS may be divided into two geographical areas:
 - South and Central Greece (south of and including Thessaly); and
 - North-East Greece (Macedonia to Thrace);
- the estimated duration of Alert Status 3; and
- the maximum energy (MWh of Natural Gas) which may be received in the specific geographical area by Transmission Users, exclusively for the supply of gas-fired Power Plants.

The IPTO, by considering the results of the above analysis and taking into consideration the safe and smooth operation of the Power Transmission System, the maximum power production by the available Natural Gas supply and the available capacity of gas-fired Power Plants that can operate with alternative fuel, recommends to the CMG the interruption/limitation of Natural Gas supply to the plants in the specific geographical area selected based on the above criteria. If the above criteria do not clearly demonstrate the order or method to implement limitations, then these will be implemented in turns or proportionally among the plants.

The CMG decides to interrupt/limit the Natural Gas supply to gas-fired Power Plants Gas, on recommendation of the IPTO, or request alternative interruption/limitation scenarios to be considered by

the IPTO. Unless the CMG members agree on the measures to be taken, the final decision is made by the representative of RAE.

To implement the above decision, DESFA issues and sends a relevant Operational Flow Order to the Transmission User(s) that serve the gas-fired Power Plants to which Natural Gas supply will be interrupted/limited, in accordance with the provisions of Article 65 and Annex III of the NNGS Network Code.

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ANNEX 4: PROCEDURE OF NATURAL GAS SUPPLY INTERRUPTION/LIMITATION TO OTHER CUSTOMERS

If the measures for the limitation of the Natural Gas supply to Interruptible Consumers and gas-fired Power Plants are not sufficient to mitigate the consequences of Alert Status 3, and in order to ensure the reliable and safe operation of the NNGS and the continued supply of the residual demand and in particular the demand of Protected Customers, the interruption/limitation of Natural Gas supply may be required to Other Customers.

The CMU, by using historical data of Natural Gas demand, the Natural Gas nominations and estimations of the Natural Gas Transmission Users, the Natural Gas Distribution System Operators and the IPTO in the forthcoming period, develops and considers, through hydraulic simulation, scenarios of Natural Gas Deliveries/Off-takes in the NNGS, identifying any mass imbalance in the forthcoming period.

Then, if considered necessary by the above analysis, and in order to eliminate the daily Natural Gas Delivery/Off-take mass balance deficit and mitigate the Emergency (Alert Status 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU determines:

- the geographical area where limitation/interruption of Natural Gas supply is required. It is indicatively mentioned that the NNGS may be divided into two geographical areas:
 - South and Central Greece (south of and including Thessaly); and
 - North-East Greece (Macedonia to Thrace);
- the estimated duration of Alert Status 3; and
- the maximum energy (MWh of Natural Gas) which may be received by the Transmission Users which Other Customers in the specific geographical area;

and send the results of the above analysis to the Natural Gas Transmission User(s).

Upon cooperation with the relevant Distribution Network Operator and taking into account (a) the Priority List of Annex 1, (b) the interruption method for similar Customers, and (c) the minimum notice required for the safe resumption or interruption of production of affected Customers, the Natural Gas Transmission User(s) recommend(s) to the CMG the interruption/limitation of supply to Other Customers in the specific geographical area, that are selected based on the above criteria, and at the same time notifies(y) the CMU about the maximum energy (MWh of Natural Gas) to be received by that User(s) at the NNGTS Exit Points from which the interruptible Customers are served.

The CMG decides to interrupt/limit the Natural Gas supply to Other Customers, according to the aforementioned recommendation, or requests the consideration of alternative scenarios for interruption/limitation by the Natural Gas Transmission User(s) that serve Other Customers. Unless the CMG members agree on the measures to be taken, the final decision is made by the representative of RAE.

To implement the above decision, DESFA issues and sends a relevant Operational Flow Order to the Transmission User(s) that serve the Other Customers of which Natural Gas supply will be interrupted/limited, in accordance with the provisions of Article 65 and Annex III of the NNGS Network Code.

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