
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

- VERSION 1.0 FEBRUARY 2013 -

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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, as in force.

b. The Plan aims, in particular, to:

- i. Determine the responsibilities, obligations and actions of the State, the Competent Authority, Natural Gas System Operators (TSOs), the Independent Power Transmission Operator (IPTO), Natural Gas Undertakings and Major Natural Gas Customers, in order to effectively address supply disruption or 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. Establish procedures and measures to be followed for each crisis level in accordance with Article 10(3) of the Regulation; and
- iii. Establish 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 Article 1 of the Network Code for the Regulation of the NNGS or in individual provisions of the Code, and the terms below will have the following meaning:

- Crisis: any event which leads or may lead to Crisis Level 1 (Early Warning Level), an Crisis Level 2 (Alert Level), or an Crisis Level 3 (Emergency Level) as defined in Article 10 of the Regulation.
- Involved Parties (Parties): The supervisory authorities, the Natural Gas and Power System Operators, and power market undertakings involved in the process of dealing with emergencies and crisis management, including the users of the NNGS, Major Customers and Gas Supply Companies.

- Confirmed User LNG Stock: the sum of LNG Stock of LNG Users at the end of a D Day, as calculated by the TSO, pursuant to the provisions of article 77 of the Network Code for the Regulation of the NNGS, plus the LNG Cargo Quantity of LNG User(s) for which the TSO has received a Notice of Arrival, as provided for in article 67(4) of the Network Code for the Regulation of the NNGS.
- Confirmed LNG Stock for Balancing purposes: the sum of LNG Balancing Stock in the tanks of the LNG Facility at the end of a D Day, plus the LNG Balancing Quantity to be supplied to the TSO within Days D+1, D+2 and D+3, under the Cargo Balancing Agreements made, as provided for in article 47 of the Network Code for the Regulation of the NNGS.
- Protected Customers: Means all household customers and customers who offer sensitive social services (particularly health facilities, schools, nursing homes, nurseries) and are connected to a natural gas distribution network.

3. Scope

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

Crisis or emergency situations can be caused either by extrinsic or intrinsic risks, as detailed in Chapter 5 of the Risk Assessment Report on the Security of Gas Supply in Greece (the "Risk Assessment Report"), prepared pursuant to the provisions of Article 9 of the Regulation and communicated to the European Commission on 12.12.2011. Such situations include, but are not limited to, the following:

- Technical problems in 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 gas suppliers, users, TSOs of upstream interconnected systems (Upstream TSOs), 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 Security Standards

Article 8 of the Regulation establishes the Supply Standard for natural gas supply of energy markets in EU Member States.

In the context of the above Standard, the measures taken during periods of Crisis, as defined in the Regulation, aim (as a minimum) to ensure natural gas supply to the Protected Customers in the following cases:

- i. extreme temperatures during a 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 for 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.

Additionally, the following two standards were considered and taken into account in the Risk Assessment Report:

- iv. Ensuring the adequacy of alternative primary energy sources to meet total demand for electricity. The targets for unserved demand for electricity as a result of gas supply crisis are: 0 MWhe, and
- v. Ensure early warning at least forty eight (48) hours before interrupting supply to the Industry.

5. Plan revisions

DESFA shall prepare and propose amendments, modifications or revisions 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 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, Regulation 715/2009 of the European Parliament and of the Council, Regulation 994/2010 of the European Parliament and of the Council, and Law of 4001/2011 and legislative texts on the basis of the power conferred by the said law.

2. DESFA Crisis Management Unit

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

- Gas Operation, Maintenance & Transportation Services Division Director (CMU Head);
- Gas Dispatching Manager;
- Regulated Services Trading Manager;
- NNGTS Operation and Maintenance Manager;
- LNG Manager; and
- Health, Safety, Quality & Environment 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 Crisis Level (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

- Organise 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 Crisis Level. The CMG shall have the following mission:

- Evaluate the recommendations of the CMU and the IPTO,
- Decide on measures for an Crisis Level 3, except in cases where such a situation has been caused by a major accident in the NNGS or the security of supply standards have been breached on occurrence of the crisis, and
- Take measures to support supply of natural gas to neighbouring 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 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 Minister of Environment, Energy and Climate Change, on recommendation of RAE or DESFA, and shall consists 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 information file issued by General Secretariat for Civil Protection in relation to natural gas operations, as amended, and

- Decide to make an appeal 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 Parties.

5. Crisis Levels - Responsibilities and obligations of 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 (Crisis Level 1)

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

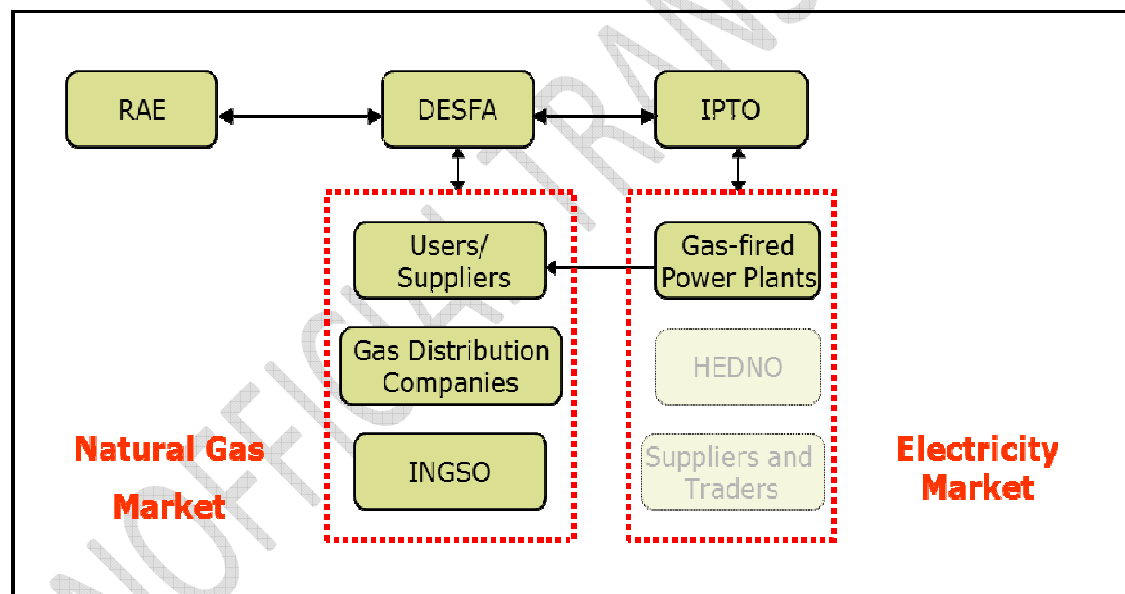


Chart 1: Involved Parties and information flow on the Early Warning Level

The following Table 1 details the roles and responsibilities of the Involved Parties:

Organisation	Roles and responsibilities
RAE	Informs the competent department of the European Commission and the Ministry for Environment, Energy & Climate Change on the crisis level. Monitors the balance of supply - demand based on data submitted by DESFA/CMU. Communicates information provided by the European Commission to DESFA/CMU.
DESFA/CMU	Collects and evaluates data and information from Users and upstream TSOs. Establishes the balance of supply - demand for the next seven (7) days. Immediately informs all Involved Parties in relation to the upgrade/downgrade of the crisis level.
IPTO	Makes estimates of the demand of natural gas plants and assesses the ability of alternative fuel in capacity, and sends them to RAE and DESFA/CMU.
Users/Suppliers	Provide DESFA/CMU with estimates about future consumption and supply of natural gas, in the form and analysis determined by DESFA/CMU.
Gas Supply Companies	Provide DESFA/CMU with estimates about future consumption of Protected Customers they serve, in the form and analysis determined by DESFA/CMU.
INGS Operators	Provide DESFA/CMU with estimates about future natural gas consumption in the INGS they operate, in the form and analysis determined by DESFA/CMU.
Natural gas power plants	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 (Crisis Level 2)

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

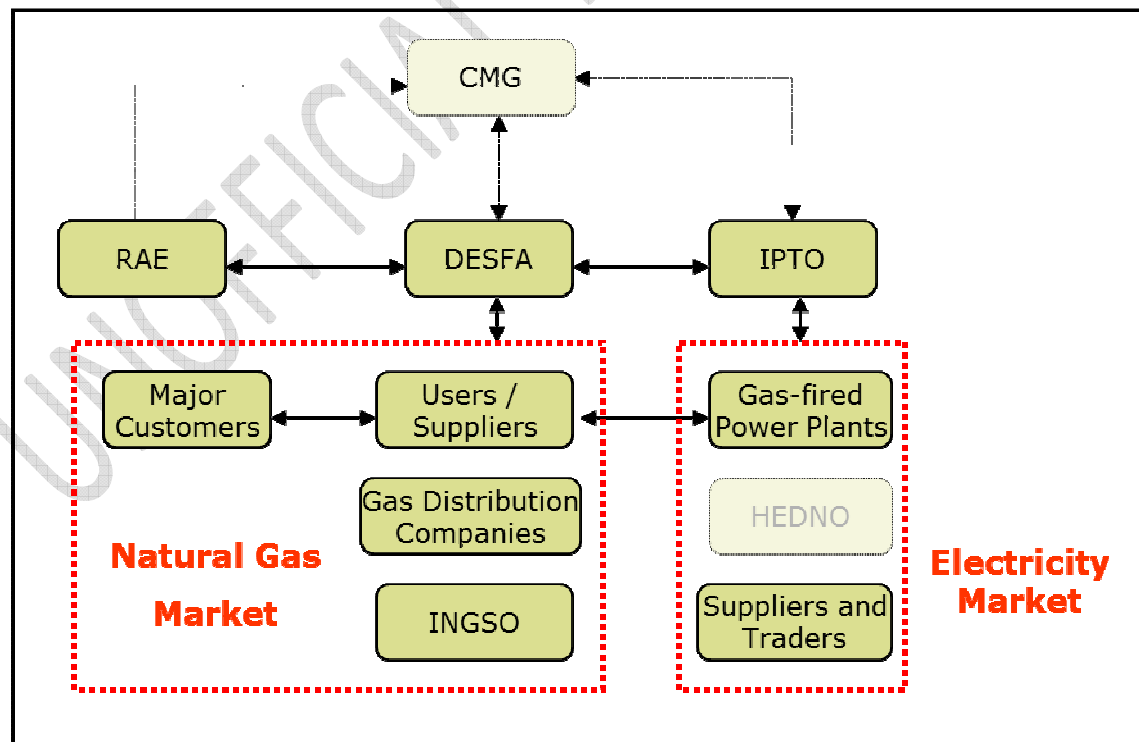


Chart 2: Involved Parties and information flow on Alert Level

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	Monitors the balance of supply - demand and the effectiveness of market measures in managing the crisis. Convenes the CMG if necessary.
DESFA/CMU	Establishes the balance of supply - demand for gas for the next seven (7) days, taking into account the market measures taken. Daily briefs RAE about the adequacy of market for the supply of Protected Customers and recommends the convening of the CMG if the measures are considered to be inadequate.
IPTO	Customizes the natural gas plant allocation plan, where necessary for their participation in a natural gas demand management mechanism.
CMG	Considers the need for non-market measures to ensure the supply of Protected Customers.
Users/Suppliers	Request from their Major Customers to reduce demand as set out in the demand management agreement. Take actions for increased supply of natural gas from alternative sources. Inform RAE and DESFA/CMU on the adoption of specific market measures and the relevant timeframe.
Gas Supply Companies	Provide DESFA/CMU with estimates about future consumption of Protected Customers they serve, in the form and analysis determined by DESFA/CMU.
INGOs Operators	Provide DESFA/CMU with estimates about future natural gas consumption in the INGOs they operate, in the form and analysis determined by DESFA/CMU.
Natural gas power plants	Implement the contractual term on demand management.
Major Customers	Implement the contractual term on demand management.
Suppliers and traders	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 (Crisis Level 3)

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

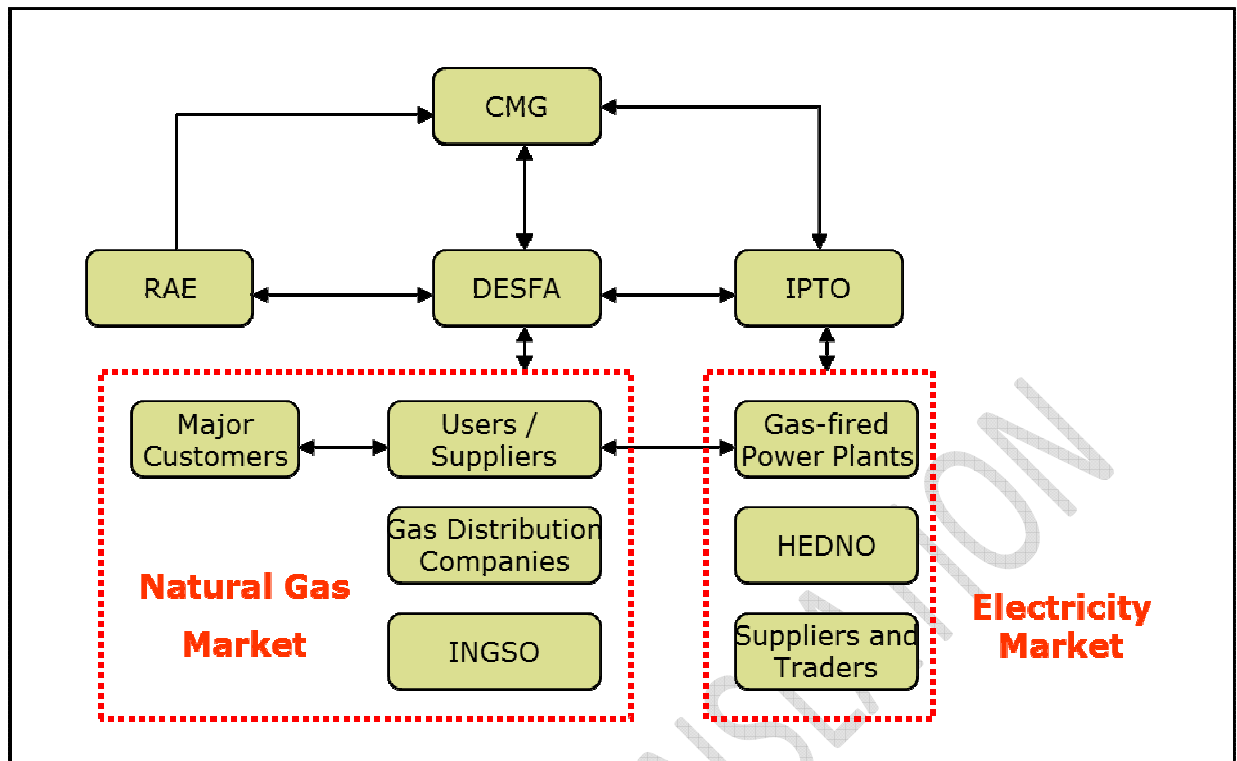


Chart 3: Involved Parties and information flow on Emergency Level

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

Organisation	Roles and responsibilities
RAE	Convenes the CMG
DESFA/CMU	Establishes the balance of supply - demand for the next seven (7) days, taking into account the market measures taken and determines the maximum quantity of natural gas that may be received in a particular geographic area. Implements non-market based measures as decided by the CMG.
CMG	Decides the adoption of non-market based measures to ensure the supply of Protected Customers. Recommends the convening of the CCEM if the standards of supply referred to in Chapter 1(4) hereof are violated.
IPTO	Participates in the decisions of the CMG, particularly in relation to limitations to power plants using natural gas. Issues the necessary allocation orders to plants using alternative fuel.
Users/Suppliers	Take actions for increased supply of natural gas from alternative sources. Request their major customers to reduce or interrupt demand on decision of the CMG issuance of a relevant order by DESFA/CMU.
Gas Supply Companies	Provide DESFA with estimates about future consumption of Protected Customers they serve, in the form and analysis determined by DESFA/CMU. Proceed to necessary demand interruptions on the networks they manage, on a relevant decision of the CMG.
INGS Operators	Implement measures to address emergencies/crises, following a decision of the CMG.
Natural gas power plants	Reduce demand on orders provided by the User serving them, on decision of the CMG and a relevant order of the DESFA/CMU.
Major Customers	Reduce demand on orders provided by the User serving them, on decision of the CMG and a relevant order of the DESFA/CMU.
HEDNO	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, e.g. 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:

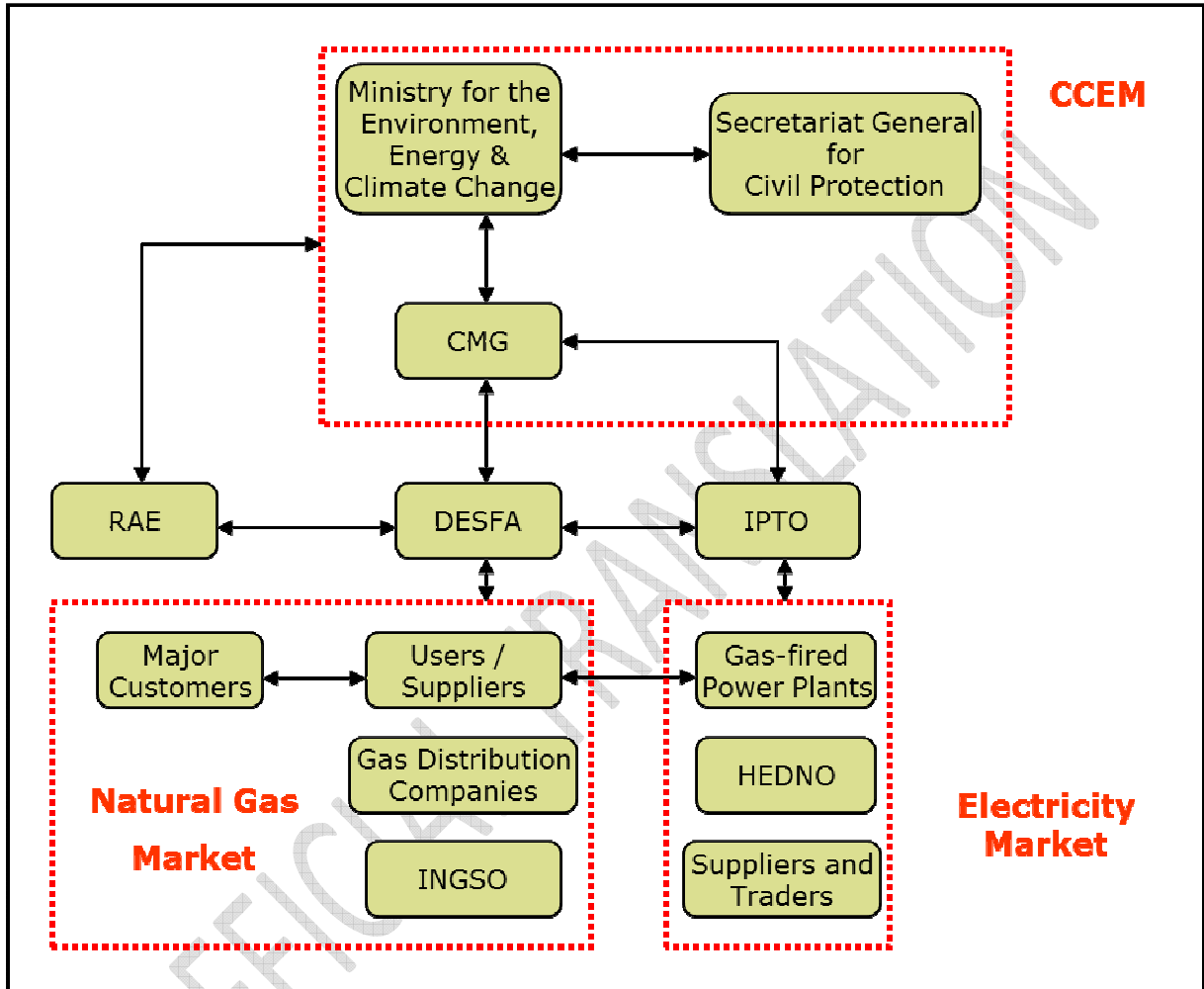


Chart 4: Involved Parties and information flow on Emergency Level

Table 4 below 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	Recommends the convening of the CCEM to the Minister for Environment, Energy and Climate Change. On decision of the CCEM, makes an appeal for assistance from the European Union and its Members States.
DESFA/CMU	Recommends the convening of the CCEM to RAE or the Minister for Environment, Energy and Climate Change.

CMG	Participates in the CCEM.
Gas Supply Companies	Make the necessary limitations to Natural Gas demand on their network, according to emergency plans drawn up.
CCEM	Coordinates government agencies to address the crisis or accident, taking into account the recommendations of the CMG, DESFA/CMU and the natural gas companies. Decides to make an appeal for assistance from the European Union and 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 must inform DESFA about any available information related to historical data and gas delivery/ reception projections for the NNGS, long-term planning data, technical information about major customers.

The Involved Parties must designate qualified contacts 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 every 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 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 standards of security of supply 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 at 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.

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CHAPTER 3: Crisis Management Tools

1. Crisis Levels - Operations

1.1 Crisis Level 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 Crisis Level 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 Receptions and Deliveries at the NNGTS, and reports on LNG Cargo Unloading at the LNG Facility of Revithousa.

1.2 Crisis Level 1

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 of natural gas, which is likely to lead to the activation of Crisis Level 2 or Crisis Level 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 Crisis Level 1 notifying all members of the CMU, and immediately informing RAE, the IPTO and all users on the declared Crisis Level 1 and the reasons that caused it.
- The CMU meets not later than twelve (12) hours from declaration of Crisis Level 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 Crisis Level.
- Under the responsibility of the head of the CMU, RAE will be informed on a daily basis and using any available means about the current situation and its likely outcome.

1.3 Crisis Level 2

Activated in case of supply disruption or extremely high demand for gas, which result in a significant deterioration of supply, which may, however, be dealt with by taking market-based measures, 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 Crisis Level 2, convenes the CMU and immediately informs RAE, the IPTO and all Users on the declared Crisis Level 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 Network Code for the Regulation of the NNGS, 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 Crisis Level.
- 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 convene 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 will be kept, which will be 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 Crisis Level 2 may have on the smooth supply of the natural gas market, if so prepared at the CMG meeting.

1.4 Crisis Level 3

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 gas is not sufficient to meet the remaining 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 Head of the CMU will evaluate the relevant information and if deemed that there is evidence of transition to Crisis Level 3, will convene the CMU.
- The CMU will convene 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 Network Code for the Regulation of the NNGS, 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 Crisis Level.
- On decision of the CMU, the head of the CMU will declare Crisis Level 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 TSO in execution of its duties, as set out in the Network Code for the Regulation of the NNGS. RAE convenes the CMG within four (4) hours of declaration of Crisis Level 3 specifying, where appropriate, the Involved Parties to participate in this meeting.
- The CMG will convene at the Crisis Management room of the Gas Control and Dispatching Centre of DESFA in Patima, Elefsina. The CMG will evaluate the information presented by the CMU and the Involved Parties and decide 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 participants at the end of the meeting, and include a list of measures to deal with the consequences brought on by Crisis Level 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 head of the CMU will inform immediately in any expedient manner the Involved Parties and Users which are or may be affected by Crisis Level 3, stating the reasons which caused it, its effects and estimated duration.
- The CMU will closely monitor the implementation of the measures and evaluate their effectiveness and daily draw brief reports which will be communicated to the CMG members.
- After resetting the status to Crisis Level 0, DESFA will prepare a report on the incident, as set out in Article 63 of the Network Code for the Regulation of the NNGS.

2. Measures to deal with Crisis Levels

2.1 Measures to deal with/ manage a Crisis Level 1

To deal with an Crisis Level 1, 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 and to restore Crisis Level 0 as soon as possible. In particular the measures taken are:

- Immediate notification of all NNGS Users by the CMU on declaration of Crisis Level 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 (daily) 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 power plants using natural gas and assessment of the ability of using alternative fuel in capacity.
- Provision of estimates of future consumption and natural gas supply to the CMU by the Users. Provision to the CMU of estimates of future consumptions of Protected Customers by the natural gas companies serving them.

2.2 Measures to deal with/manage Crisis Level 2

To deal with an Crisis Level 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 Crisis Level 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 Crisis Level 2 and the reasons that caused it.
- Regular communication of the CMU with Transmission and/or LNG Users (within eight (8) hours from occurrence and on a daily basis thereafter).
- Increase of deliveries through pipeline Gas Supply Agreements with a Daily Load Factor less than 85%.

- Increase of deliveries through LNG stand-by agreements upon timely notice to the producer/supplier.
- Additional Capacity of LNG Regasification on a short-term basis.
- Reduced deliveries through natural gas demand contracts between Suppliers and Natural Gas Customers.

2.3 Measures to deal with/manage Crisis Level 3

To address an Crisis Level 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:

- Enforced interruption/limitation of demand from natural gas customers, according to the Priority List of Annex 1 hereto.
- Stand-by natural gas supply agreements for TSO balancing purposes.
- Submission by RAE of an appeal for assistance from the European Union or its Member States.

Adoption of 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 IPTSO within the CMG

The IPTSO 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 a Crisis Level 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.
- Desynchronisation of power plants using natural gas during low-load hours.

- Order to dispatch natural gas plants on alternative fuel.
- Emergency power imports.
- Reduction/ interruption of power exports, provided that this does not compromise smooth supply to protected customers in EU Member States.

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3. Activation of Crisis Levels – Involved Parties - Measures

The CMU Head will activate the appropriate Crisis Level upon occurrence of any of the following incidents, when in his opinion this affects or could affect the smooth and secure supply of the country with natural gas, and provide relevant justification to RAE. In any other case where, in the Head's judgment smooth and safe supply of the country with natural gas is or may be affected, he will activate the appropriate Crisis Level on consent of RAE.

A. Delivery at an Entry Point of a Natural Gas Quantity equal to or less than 80% of that declared, 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 NNGTS Imbalance is greater than or equal to zero, the CMU head declares Crisis Level 1.

Involved Parties: DESFA, RAE, Transmission Users who have booked Delivery Transmission Capacity at the Entry Point, Suppliers delivering natural gas at said Entry Point, Upstream TSOs.

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 Crisis Level 1, the measures taken or planned to be taken in order to prevent a possible development to Crisis Level 2 or 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level changes. The involved Users and Suppliers must immediately notify the CMU of any detail or information which may lead to a change in the Crisis Level, by using any expedient means. DESFA will communicate with Upstream TSOs (where appropriate) in order to be informed about issues which may affect the progress of the Crisis Level, and inform RAE on a daily basis.

- ii. Where the Daily NNGTS Imbalance is less than zero, and demand can be met and only market-based measures need to be taken, the CMU Head will declare Crisis Level 2.

Involved Parties: DESFA, RAE, Transmission Users who have booked Delivery Transmission Capacity at the Entry Point, Suppliers delivering natural gas at said Entry Point, Upstream TSOs.

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 Crisis Level 2, the

measures taken or planned to be taken in order to prevent a possible development to Crisis Level 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level changes. The involved Users and Suppliers must immediately notify the CMU of any detail or information which may lead to a change in the Crisis Level, by using any expedient means. The TSO will communicate with Upstream TSOs in order to be informed about issues which may affect the progress of the Crisis Level. The TSO will assess the possibility of dealing with Crisis Level 2 using 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 Crisis Level 2. The CMU will send on a daily basis a report to RAE, on the development of the Crisis Level. 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 Crisis Level 0.

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

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Upstream TSOs, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution system operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5.

B. Reception of Natural Gas at a quantity greater than or equal to 120% of that declared, for a period greater than or equal to two (2) consecutive days.

- i. Where the Daily NNGTS Imbalance is greater than or equal to zero, the CMU head declares Crisis Level 1.

Involved Parties: DESFA, RAE, Transmission Users submitting inaccurate Daily Statements, Major Natural Gas 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 Crisis Level 1, the measures taken or planned to be taken in order to prevent a possible development to Crisis Level 2 or 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level 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 Crisis Level. 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 Crisis Level 1 and the estimated time to Crisis Level change. The CMU will inform RAE on a daily basis.

- ii. Where the Daily NNGTS Imbalance is less than zero, and demand can be met and only market-based measures need to be taken, the CMU Head will declare Crisis Level 2.

Involved Parties: DESFA, RAE, Transmission Users submitting inaccurate Daily Statements, Major Natural Gas 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 Crisis Level 2, the measures taken or planned to be taken in order to prevent a possible development to Crisis Level 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) until the Crisis Level 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 Crisis Level. 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 Crisis Level 2 and the estimated time to restore Crisis Level 0. Major Customers will send the relevant information to the CMU within three (3) hours from dispatch of the relevant request from the CMU. The TSO will assess the possibility of dealing with Crisis Level 2 using 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 Crisis Level 2. The CMU will send on a daily basis a report to RAE, on the development of the Crisis Level. 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 Crisis Level 0.

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

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Upstream TSOs, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution system operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5.

C. Confirmed Stock of User LNG less than or equal to four times the Average Daily Quantity of LNG regasified and injected into the NNGTS during the immediately preceding four (4) days.

- i. Where the Daily Reception Quantity of natural gas by the NNGTS is less than the Booked Transmission Capacity at a pipeline Entry Point, as estimated by the TSO, the CMU Head will declare Crisis Level 1.

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

Measures: The involved Users will submit to the CMU, within twelve (12) hours after sending a relevant request, a report on the causes of Crisis Level 1, the measures taken or planned to be taken in order to prevent a possible development to Crisis Level 2 or 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level 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 Crisis Level. The CMU will inform RAE on a daily basis.

- ii. Where the Daily Reception Quantity by the NNGTS is greater than the Booked Transmission Capacity at pipeline Entry Points, as estimated by the TSO, and demand can be met only by taking market-based measures, the CMU head will declare Crisis Level 2 on decision of the CMU.

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

Measures: The involved LNG Users and Transmission Users having booked Delivery Transmission Capacity at 'Agia Triada' Entry Point will submit to the CMU, within six (6) hours after sending a relevant request, a report on the causes of Crisis Level 2, the measures taken or planned to be taken in order to prevent a possible development to Crisis Level 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level 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 Crisis Level. The CMU will contact (if necessary) Transmission Users which have booked Delivery 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 regasified and injected into the NNGTS during the immediately preceding four (4) days. Transmission Users which have booked Delivery 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 Crisis Level 2. The CMU will send on a daily basis a report to RAE, on the development of the Crisis

Level. 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 Crisis Level 0.

- iii. Where the Daily Reception Quantity by the NNGTS is greater than the Booked Delivery Transmission Capacity at pipeline Entry Points, as estimated by the TSO, and demand cannot be met without the need for non market-based measures, the CMU head will declare Crisis Level 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, TSOs of upstream transmission systems, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution system operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5.

D. Confirmed LNG Stock 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 Reception Quantity of Natural Gas by the NNGTS, as estimated by the TSO, is less than or equal to the Daily Reception Quantity of Natural Gas estimated by the TSO at the NNGTS, the CMU Head will declare Crisis Level 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 Crisis Level 1, the measures taken or planned to be taken in order to prevent a possible development to

Crisis Level 2 or 3, and the actions taken or planned to be taken in order to restore Crisis Level 0. The above report will be submitted on a daily basis (or more frequently if required by the CMU) to the CMU until the Crisis Level 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 Crisis Level. Transmission Users will submit to CMU, by 18:30 on each Day, estimates of the Daily Natural Gas Deliveries/Receptions 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 Reception Quantity of Natural Gas by the NNGTS, as estimated by the TSO, is greater than the Daily Delivery Quantity of Natural Gas at the NNGTS, as estimated by the TSO, and demand can be met only by taking market-based measures, the CMU head will declare Crisis Level 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 Deliveries/Receptions of Natural Gas Quantities 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 Crisis Level. 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 Stock 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 Crisis Level 2. The CMU will send on a daily basis a report to RAE, on the development of the Crisis Level. 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 Crisis Level 0.

- iii. Where the Daily Reception Quantity of Natural Gas by the NNGTS, as estimated by the TSO, is greater than the Daily Delivery Quantity of Natural Gas at the NNGTS, as estimated by the TSO, and demand cannot be met without the need for non market-based measures, the CMU head will declare Crisis Level 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, LNG Users, Natural Gas Suppliers, Upstream TSOs, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution system operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5.

E. Inability to settle Daily User Statements 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 reduce or stop the incident, according to the Information File issued by the Secretariat Secretariat for Civil Protection in relation to natural gas operations, as amended.

- i. Where demand can be met without the need for non market-based measures, the CMU head will declare Crisis Level 2 on decision of the CMU.

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

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

- ii. Where demand cannot be met without taking non market-based measures, the CMU Head will declare Crisis Level 2 on decision of the CMU.

Involved Parties: DESFA, RAE, affected Transmission Users, affected LNG Users, Natural Gas Suppliers, Upstream TSOs, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution systems operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5. Failure to comply with the above procedure due to the nature of the technical problem, DESFA will immediately interrupt supply to customers, 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 network emergency.

In the event of an incident due to extraordinary circumstances in the National Natural Gas Distribution System, the staff of the Distribution System will take all efforts and make all suitable operations to reduce or stop the incident, according to the Information File issued by the Secretariat General for Civil Protection in relation to natural gas operations, as amended.

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

Involved Parties: DESFA, RAE, Transmission Users delivering Natural Gas to the distribution network, operator of a distribution network involved in an emergency situation.

Measures: The distribution network Operator will immediately take all expedient measures referred to in 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 network 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 Crisis Level 1.

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

Measures: The Major Customers involved 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 Major Customers involved must immediately notify using any expedient means the CMU of any detail or information which may lead to Crisis Level 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 Authorisations Regulation, the CMU Head will declare Crisis Level 2 on decision of the CMU.

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

Measures: The CMU will inform RAE determining the size of shortage in supply, and implement the provisions of Article 30(6) of the Authorisations 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 Crisis Level 3 on decision of the CMU.

Involved Parties: DESFA, RAE, Transmission Users, Natural Gas Suppliers, TSOs of upstream transmission systems, IPTO, Interruptible Customers (as defined in Article 73 of Law 4001/2011, other customers, distribution system operators.

Measures: The CMU will immediately notify using any expedient means the Involved Parties about Crisis Level 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 Crisis Level 3 and transit to a lower alert level. Where the measures pertain to the reduction or interruption of natural gas supply to customers, their implementation will be made in accordance with the procedures of Annexes 2, 3, 4 and 5.

UNOFFICIAL TRANSLATION

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

The necessary interruption/limitation of natural gas supply to customers is the key measure to manage a Crisis Level 3 in order to ensure reliable and safe operation of the NNGS and supply of residual demand and especially 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:

- Licensed power producers using natural gas that have made entered into an interruption agreement with DESFA for Major Customers, in accordance with Article 73(2) of Law 4001/2011, for prioritised interruption/limitation of natural gas supply against a consideration in case of an emergency (Crisis Level 3).
- Major Customers that have entered into an interruption agreement with DESFA for prioritised interruption/limited supply of natural gas supply against a consideration, in case of an emergency (Crisis Level 3), pursuant to the provisions of Article 73(2) of Law 4001/2011.
- Power plants using natural gas, which have not made an agreement with DESFA for interruption/limitation of natural gas supply in case of an emergency (Crisis Level 3).
- Other Customers in the following order of interruption:
 - i. Major Industrial Customers with an annual natural gas consumption greater than 100 GWh using natural gas as raw material for the production of caloric fluids (e.g. steam) and heat and power cogeneration.
 - ii. Major Industrial Customers with an annual natural gas consumption greater than 100 GWh using Natural Gas for processes (furnaces, etc.).
 - iii. Small Industrial Customers with an annual natural gas consumption equal to or less than 100 GWh using natural gas as raw material for the production of caloric fluids (e.g. steam) and heat and power cogeneration.
 - iv. Small Industrial Customers with an annual natural gas consumption equal to or less than 100 GWh using Natural Gas for processes (furnaces, etc.).

- v. Commercial Customers that are not Protected Customers, according to the Emergency Plan of the Natural Gas Distribution 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.

UNOFFICIAL TRANSLATION

ANNEX 2: PROCEDURE OF NATURAL GAS SUPPLY INTERRUPTION/LIMITATION TO INTERRUPTIBLE POWER PLANTS

To mitigate the impact of Crisis Level 3 and in order to ensure reliable and safe operation of the NNGS, the interruption/limitation of natural gas supply may be required to licensed electricity producers using natural gas that have signed a relevant interruption agreement with DESFA.

The CMU will assess the supply of natural gas at regular intervals to check whether demand for natural gas, as estimated by DESFA, is met. Using historic data of natural gas demand, the statements and projections of Natural Gas Transmission Users, Natural Gas Distribution Operators and IPTO for the near future, the CMU develops and considers through hydraulic simulation scenarios of natural gas delivery/reception quantities, identifying any mass balance for the near future.

Subsequently, if considered necessary in the above analysis, to eliminate the daily mass balance deficit and mitigate the emergency (Crisis Level 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU will determine:

- the geographic area where limitation/interruption of natural gas supply is required. It is indicatively mentioned that the NNGS may be divided into two geographic areas:
 - South and Central Greece (south of and including Thessaly); and
 - North-East Greece (Macedonia to Thrace);
- its estimated duration, and
- the maximum energy (MWh of natural gas) which may be received in the specific geographic area by Transmission Users supplying power plants which must keep reserve fuel.

Considering the results of the above analysis and taking into consideration the safe and smooth operation of the Transmission System, maximum production of electricity using the available natural gas supply and the available capacity of natural gas power plants that can operate on reserve fuel, the IPTO will recommend to the CMG the interruption/limitation of natural gas supply to the aforementioned plants in the specific geographic area selected based on the above criteria. If the above criteria do not clearly demonstrate the order or method to implement limitations, these will be implemented in turns or proportionally.

The CMG will decide to interrupt/limit natural gas supply to licensed power producers using natural gas that have entered into an interruption agreement with DESFA, on recommendation of the IPTO, or

request that alternative interruption/limitation scenarios are 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 will issue and send a relevant Operational Flow Order to the competent Transmission User(s) serving the power plants at which natural gas supply will be interrupted/limited, in accordance with the provisions of Article 63 and Annex III of the Network Code for the Regulation of the NNGS.

UNOFFICIAL TRANSLATION

ANNEX 3: SUPPLY INTERRUPTION LIMITATION PROCEDURE TO INTERRUPTIBLE MAJOR CUSTOMERS

To mitigate the impact of Crisis Level 3 and in order to ensure reliable and safe operation of the NNGS, the interruption/limitation of natural gas supply may be required to Major Customers that have signed a relevant interruption agreement with DESFA.

The CMU will assess the supply of natural gas at regular intervals to check whether demand for natural gas, as estimated by DESFA, is met. Using historic data of natural gas demand, the statements and projections of Natural Gas Transmission Users, Natural Gas Distribution Operators and IPTO for the near future, the CMU develops and considers through hydraulic simulation scenarios of natural gas delivery/reception quantities, identifying any mass imbalance for the near future.

Subsequently, if considered necessary in the above analysis, to eliminate the daily mass balance deficit and mitigate the emergency (Crisis Level 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU will determine:

- the geographic area where limitation/interruption of natural gas supply is required. It is indicatively mentioned that the NNGS may be divided into two geographic areas:
 - South and Central Greece (south of and including Thessaly); and
 - North-East Greece (Macedonia to Thrace);
- its estimated duration, and
- the maximum energy (MWh of natural gas) which may be received by Transmission Users supplying Interruptible Major Customers in the specific geographic area.

Taking into account the results of the above analysis and having regard to the safe and smooth operation of the Natural Gas Transmission System, the CMU will recommend the interruption/limitation of natural gas supply to the above interruptible Major Customers in the specific geographic area.

The CMG will decide to interrupt/limit natural gas supply to Major Customers that have entered into an agreement with DESFA for interruption against valuable consideration, on recommendation of the CMU, or request that alternative interruption/limitation scenarios are considered by the CMU. Unless the CMG members agree on the measures to be taken, the final decision is made by the representative of the Competent Authority.

To implement the above decision, DESFA will issue and send a relevant Operational Flow Order to the competent Transmission User(s) serving Interruptible Major Customers to which natural gas supply will be interrupted/limited, in accordance with the provisions of Article 63 and Annex III of the Network Code for the Regulation of the NNGS.

UNOFFICIAL TRANSLATION

ANNEX 4: PROCEDURE OF NATURAL GAS SUPPLY INTERRUPTION/LIMITATION TO POWER PLANTS

To mitigate the impact of Crisis Level 3 and in order to ensure reliable and safe operation of the NNGS and the continued supply of residual demand and particularly Protected Customers, the interruption/limitation of natural gas supply may be required to power plants using natural gas.

Using historic data of natural gas demand, the statements and projections of Natural Gas Transmission Users, Natural Gas Distribution Operators and IPTO for the near future, the CMU develops and considers through hydraulic simulation scenarios of natural gas delivery/reception quantities, identifying any mass imbalance for the near future.

Subsequently, if considered necessary in the above analysis, to eliminate the daily mass balance deficit and mitigate the emergency (Crisis Level 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU will determine:

- the geographic area where limitation/interruption of natural gas supply is required. It is indicatively mentioned that the NNGS may be divided into two geographic areas:
 - South and Central Greece (south of and including Thessaly); and
 - North-East Greece (Macedonia to Thrace);
- its estimated duration, and
- the maximum energy (MWh of natural gas) which may be received by Transmission Users supplying power plants in the specific geographic area.

Considering the results of the above analysis and taking into consideration the safe and smooth operation of the Transmission System and maximum production of electricity using the available natural gas supply and the available capacity of natural gas, the IPTO will recommend to the CMG the interruption/limitation of natural gas supply to the plants in the specific geographic area which are selected based on the above criteria. If the above criteria do not clearly demonstrate the order or method to implement limitations, these will be implemented in turns or proportionally among similar plants.

The CMG will decide to interrupt/limit natural gas supply to power plants using natural gas, on recommendation of the IPTO, or request that alternative interruption/limitation scenarios are considered

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

To implement the above decision, DESFA will issue and send a relevant Operational Flow Order to the competent Transmission User(s) serving the power plants at which natural gas supply will be interrupted/limited, in accordance with the provisions of Article 63 and Annex III of the Network Code for the Regulation of the NNGS.

UNOFFICIAL TRANSLATION

ANNEX 5: SUPPLY INTERRUPTION/LIMITATION PROCEDURE TO OTHER CUSTOMERS

To mitigate the impact of Crisis Level 3 and in order to ensure reliable and safe operation of the NNGS and continued supply of residual demand and particularly Protected Customers, the interruption/limitation of natural gas supply may be required to Other Customers.

Using historic data of natural gas demand, the statements and projections of Natural Gas Transmission Users, Natural Gas Distribution Operators and IPTO for the near future, the CMU develops and considers through hydraulic simulation scenarios of natural gas delivery/reception quantities, identifying any mass imbalance for the near future.

Subsequently, if considered necessary in the above analysis, to eliminate the daily mass balance deficit and mitigate the emergency (Crisis Level 3) so that uninterrupted supply of Protected Customers is ensured in all cases, the CMU will determine:

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

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

Upon consultation 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 safe resumption or interruption of production of affected Customers, the Natural Gas Transmission User(s) will recommend to the CMG the interruption/limitation of supply to Other Customers in the specific geographic area, that are selected based on the above criteria, at the same time 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 natural gas supply to Other Customers, according to the aforementioned recommendation, or requests the examination of alternative scenarios for interruption/limitation by the Natural Gas Transmission User(s) serving 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 will issue and send a relevant Operational Flow Order to the competent Transmission User(s) serving Other Customers to which natural gas supply will be interrupted/limited, in accordance with the provisions of Article 63 and Annex III of the Network Code for the Regulation of the NNGS.

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