

IOOA Response to Legal Drafting for A071 – 18/07/2017

Hi,

See below some comments from IOOA's members on the proposed wording for the A071 code modification:

- Part H (Section 2.3.3 & 2.3.3) – In order for the refund mechanism to work the TSO must notify the affected shippers of an interruption to an entry point. Will this be done by issuing an OFO? The wording in Section 2.3.2 & 2.3.3 states that it may issue an OFO on a Restricted Capacity Day. However, IOOA's members believe that the TSO must issue a notification of some form for each interruption at an entry point regardless of whether the interruption is 30 minutes or 30 days subject to the conditions set out in section 5.10.5 .
- Part 5 (Section 5.10.2 (c)) – the maintenance limits may not necessarily be exhausted when a capacity charge rebate is applicable. For example say the transporter plans to take 5 days maintenance during the summer and an outage occurs for one day during the winter at short notice (less than seven days' notice). In this case the maintenance limits will not have been exhausted but a capacity refund is applicable.
- Does a communications protocol needs to be put in place between GNI and shippers active at each entry point to ensure the timely issuing of OFO's which is the mechanism (we think) to inform shippers of Restricted Capacity Days.

Best Regards,

Brian