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Dear Julian

**EDF Energy Response to UNC Modification 0124 “Amendment to the window for the acceptance of meter reads by the Transporter”.**

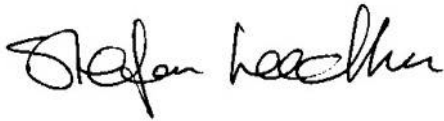
EDF Energy welcomes the opportunity to respond to this consultation and offer our full support to its implementation. This proposal will allow Shippers a longer period to validate the meter reads that have been rejected by xoserve, and allow more meter reads to be submitted. This will ensure that Shippers and NDM sites are reconciled based on accurate meter reads, and ensure that the AQs are more accurate. We believe that this will aid demand forecasting, residual balancing and encourage competition amongst Shippers. In particular we believe that:

- Extending the current window to submit meter reads from 10 days to 15 days, will provide Shippers with a longer period to validate meter reads that have been rejected by xoserve. This will provide Shippers adequate time to run their internal checks on the reads, and if necessary carry out a visual inspection of the meter prior to resubmission. This will enable more valid meter reads to be submitted.
- Increasing the number of meter reads submitted will ensure the accurate reconciliation of the Large Supply Point (LSP) sector, and so therefore a more accurate Reconciliation by Difference (RbD). This will ensure more accurate cost targeting, encouraging competition amongst Shippers and Suppliers, thereby facilitating Licence Condition A11.1 (d).
- Enabling more meter reads to be submitted will allow xoserve and Shippers to develop more accurate AQs for the sites that are in their portfolio. This should allow more accurate cost targeting than is presently the case, thereby encouraging competition between Shippers and Suppliers. More accurate AQs should also enable Transporters to build up a more accurate demand forecast. This will enable Shippers to develop a more accurate view of their position and so take appropriate actions to ensure that they are balanced, thereby reducing the balancing actions of National Grid as residual system balancer. This will therefore encourage the economic and efficient operation of the pipeline system and thereby facilitate achievement of Licence Condition A11.1 (a).
- More accurate AQs would also enable Shippers and Suppliers to bill customers more accurately when issuing an estimated bill, which is based on a seasoned profile of the customers AQ. More accurate bills are beneficial to the customer, and should also encourage competition amongst suppliers.
- EDF Energy recognises the Transporters’ and xoserve’s concerns that extending the window for submitting meter reads could have on their systems if more reads were to be

submitted. We would however note that the arrangements for submitting meter reads should reflect operational practices of both xoserve and Shippers to ensure neither party is detrimentally impacted. We therefore believe that extending the window to 15 business days will better reflect the operational practices of Shippers, whilst ensuring the protection of xoserve's systems.

I hope you find these comments useful, and please contact me should you wish to discuss these comments further.

Yours sincerely

A handwritten signature in black ink that reads "Stefan Leedham".

Stefan Leedham  
Gas Market Analyst  
Energy Regulation, Energy Branch.