

John Bradley
UNC Panel Secretary
31 Homer Road
Solihull
West Midlands
B91 3LT



08 June 2009

Dear John

EDF Energy Response to UNC Modification Proposal 0250: “Introduction of the Code Contingency Guidelines Document”.

EDF Energy welcomes the opportunity to respond to the UNC Modification Proposal. We support implementation of 0250.

The existing contingency arrangements have been in place for a number of years without any significant review or update during this period. The Gemini system failure in 2007 highlighted to the industry the importance of having clear, accessible, well understood and tested contingency arrangements in place. In response to this National grid Gas (NGG) raised UNC Review Group 217. EDF Energy was an active participant of this review group and fully supports the recommendations and findings of this group. Modification Proposal 250 enacts these recommendations and so we fully support this proposal.

As noted in the proposal Review Group 217 recommended that the proposed Code Contingency Arrangements should be governed under TPD Section V as a UNC Related Document, with all contingency arrangements available in one place. However NGG is now proposing that they should be governed by Section U as an appendix to the UK Link Manual. EDF Energy is disappointed that this issue was not raised and discussed as part of Review Group 217 by NGG; however we are supportive of NGG’s recommendation. We believe that including the Code Contingency Arrangements as a UK Link Manual Appendix will ensure that all of the arrangements are available in a single location whilst also removing the issues of dual governance. However we would expect this document to be available on the Joint Office website from implementation of this proposal.

EDF Energy also supports NGG’s proposal to transfer the UK Link Manual from xoserve’s website to the Joint Office website so that it is available in a common area that is not password protected and easy to find. We believe that this will improve transparency in this area and so help to ensure that Shippers have access to this information when required. As noted by NGG any change to the UK Link Manual will require a UK Link Modification Proposal. We would also note that at the last UK Link Committee meeting it was recognised that there was a requirement to also introduce Exit Capacity arrangements into the contingency arrangements. There is therefore clearly a need for any proposal to be raised and enacted as soon as possible so that the industry can immediately benefit from these improved arrangements.

I hope you find these comments useful, however please contact my colleague Stefan Leedham (Stefan.leedham@edfenergy.com, 020 3126 2312) should you wish to discuss these in further detail.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Seb Eyre".

Dr. Sebastian Eyre
Energy Regulation, Energy Branch