

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



06 November 2009

Dear John

EDF Energy Response to UNC Modification Proposal 0259: “Removal of Obligations to Install UK Link User Equipment and UK Link User Software for UK Link Users who utilise the services of an UK Link User Agent”.

EDF Energy welcomes the opportunity to respond to this UNC Modification Proposal. We support implementation of modification proposal 0259.

As recognised by the Modification Proposal the UNC currently requires the installation of UK Link equipment and software at the Shipper’s premise, even if the Shipper is intending to utilise the services of a UK Link Agent to facilitate their obligations. EDF Energy understands that the installation of this equipment and software is part of the User Admission User Pays Service as set out in the Agency Charging Statement (ACS). Therefore currently a new Shipper is charged for the installation and provision of equipment and software that they do not require and do not intend to use. This appears neither economic nor efficient and enforces an unnecessary charge on incoming Shippers that opt to use a UK Link Agent. This proposal seeks to remove these costs by allowing a Shipper who utilises a UK Link Agent to opt not to have the equipment and software installed.

We would also note that as recognised by the proposal, in the event that a UK Link Agent ceases to act as an agent on behalf of the Shipper, then the Shipper will still have access to the UK Link through the XPI token process. This should enable the Shipper to remain compliant with UNC obligations until such time as an alternate Agent is appointed, or the required equipment and software is installed.

In addition to the particular points raised in the UNC Modification Proposal EDF Energy would make the following observations:

3. Extent to which implementation of the proposed modification would better facilitate the relevant objectives:

Standard Special Condition A11.1 (d): so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition: (i) between relevant Shippers;

Currently the UNC requires the installation of this equipment and software regardless of whether the Shipper intends to utilise the equipment. This is funded through a User Pays charge. Whilst the cost of this is understood to be relatively small, this cost could still (theoretically) represent a barrier to entry. This proposal could therefore be beneficial to competition by removing a theoretical barrier to entry, and so facilitate compliance with this Licence Condition.

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