

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



10 December 2009

Dear John

EDF Energy Response to UNC Modification Proposal 0269: “Provision of Exit information at all NTS Exit Points for the transitional exit period”.

EDF Energy welcomes the opportunity to respond to this UNC Modification Proposal. We support implementation of modification proposal 0269.

This proposal essentially publishes the information that will be published when modification proposal 0195AV is fully implemented with effect from 1 October 2012, although recognising that the exit capacity products that are available are different post 1 October 2012. We would in fact note that NGG is already publishing some of this information regarding enduring capacity bookings and available exit capacity for the enduring period. We therefore do not believe there are any issues with publishing this information in the transitional period to ensure that NGG is compliant with Article 6 of EC Regulation 1775/2005. We would also note that similar information is also published for the entry capacity regime, although recognise that this is materially different to the exit regime. In particular on entry there are less points and the majority of entry points have numerous Shippers booking entry capacity, unlike exit where there are numerous single Shipper points.

EDF Energy would further welcome the development work that NGG has undertaken regarding this proposal. In particular we believe that this proposal is now sufficiently clear regarding the publication of firm and interruptible capacity bookings and how capacity bookings will be treated for new sites connecting and registering capacity in the transitional period. We believe that the publication of this information will lead to improved transparency in the market, but note that the implications of this is less than those that for the rest of mainland Europe.

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 (b): so far as is consistent with sub-paragraph (a), the coordinated, efficient and economic operation of: (i) the combined pipe-line system, and/or (ii) the pipe-line system of one or more other relevant gas transporters;

As previously noted the majority of exit points are single Shipper sites. It is therefore likely that Shippers will already be aware of their capacity bookings and requirements at these exit points. We therefore do not believe that making information publicly available that is already held internally would result in more accurate information in signals. We do however believe that the ability to partially assign capacity between users should result in more economic signals. We are therefore surprised that NGG believes that this proposal will result in more

accurate information signals, whilst the ability to assign capacity to Shippers that require it will not.

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;

EDF Energy agrees that improved transparency should be beneficial to competition. However we would also note that this is expected to be a marginal benefit. The UK market is already liberalised and competitive, with capacity being available to those who require it.

10. Consequence on the legislative and regulatory obligations and contractual relationship of each Transporter and each User and Non Code Party of implementing the Modification Proposal

As recognised by NGG implementation of this proposal would allow NGG to exceed the requirements of Article 6 of EC Regulation 1775/2005. However we would note that an element of this requirement was on the TSO to consult with interested parties to identify what the relevant points were that this information should be published for. EDF Energy does not believe that this represents a consultation on relevant points. This proposal is only to release the information for all NTS Exit Points.

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