

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



11 May 2009

Dear John

EDF Energy Response to UNC Modification Proposal 0249: “Introduction of an Enduring Annual NTS Exit (Flat) Capacity Invitation Letter”.

EDF Energy welcomes the opportunity to respond to the UNC Modification Proposals. We support implementation of 0249.

EDF Energy would like to take the opportunity to express our concern with the timescale that this modification proposal has been progressed. In particular we would note that this issue should have been addressed at a much earlier stage. We would note that this was an issue raised by Ofgem in its decision on 0243V another proposal also relating to the implementation of 0195AV. Given the concerns expressed by Ofgem in its decision letter on 0195AV and the conduct of certain parties raising issues very late in the consultation process, EDF Energy is surprised that these organisations are still raising proposals to address aspects of the legal text of 0195AV.

- We would also question the value of publishing this information? Whilst we recognise that in the constrained period (Gas Years Y+1 to Y+3 inclusive) this information will be useful in enabling Shippers to identify what capacity is available and where. This will be of particular relevance, if exit capacity substitution is introduced. However in Gas Years Y+4 onwards the system is unconstrained and theoretically NGG is able to invest to release capacity wherever it is required –unless it plays a joker card. It is therefore unclear what value this information would provide to Shippers, other than the strategies and configurations of their competitors although given the products that are available we believe that the value of this will be limited. We therefore support this proposal, as whilst we are unable to identify any benefits, we do not believe there are any reasons why it should be not be published.

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