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Dear Julian

**EDF Energy Response to UNC Modification 0097 “Modification to Release Aggregated Ex-Post Information for Pipeline Interconnector Offtake Flows”.**

EDF Energy welcomes the opportunity to respond to this modification proposal and offer our full support for its implementation. EDF Energy continues to believe that information transparency is a fundamental requirement of a functioning competitive market, and welcome the recent steps Ofgem has implemented in facilitating this requirement. We believe that in addition to releasing new information to the market, this proposal will also address information access by making the Gemini Meter list available on the public website, and so ensure that all interested parties have access to this information.

We would further note that a benefit of this proposal is that it maintains the Gemini system as an interface for shippers. If the information were only to be published on the public website for certain meter reads, and not on the Gemini system, then shippers would be faced with the same information dispersed across numerous platforms, rather than available from one source. This can be most clearly seen with the Operational Information available on National Grid’s website, where there are numerous reports measuring demand at different levels on the same day, and reports that are mixing nominated flows in with physical ones. EDF Energy would therefore question whether this is an efficient use of resources, and whether an exercise should be undertaken by National Grid, identifying which sources of information are required and acting upon this.

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

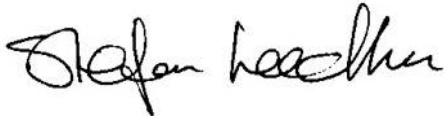
EDF Energy believes that implementation of this modification would release additional information to the market. This would enable Shippers to better forecast demand, and thus take the appropriate trading decisions to ensure that their portfolio was balanced. This would result in an improved balance on the system as a whole, and so reduce the residual balancing actions required of National Grid, thereby facilitating the relevant objective of the efficient and economical operation of the pipe-line system. We would further note that as Shippers would be better able to forecast demand and balance their portfolio this would positively impact on security of supply, thereby facilitating relevant objective A11.1 (c), the efficient discharge of the licensee’s obligations. We would further note that this relevant objective is further facilitated as by making the full Gemini Meter List available on the public website, larger customers will be able to identify the supply and demand balance and

decide whether to offer a Demand Side Response to the market, thereby improving security of supply. We would further note that implementation of this modification would ensure all Shippers, and Suppliers; have access to this information on a level playing field. We believe that this would facilitate relevant objective A11.1 (d), the securing of effective competition (i) between relevant shippers, (ii) between relevant suppliers.

EDF Energy further welcome's the proposal's proposed phased approach to implementation, to ensure that this information is available through at least one source as soon as possible and hopefully in time for this winter. We concur with the Proposer that this information is sufficiently important that all possible are actions are taken to ensure that this information is available to the market this winter.

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 Market Strategy, Energy Branch.