

Gas Distribution Networks



20 December 2007

Dear Gas Distribution Networks

EDF Energy Response to Discussion Document: “DN Interruptible Capacity Methodology Statement.”

EDF Energy welcomes the opportunity to respond to the Discussion Document. We are supportive of this proposal; however have some minor comments to make regarding the content of the paper.

In general we believe that this document is reflective of the discussions that took place as part of the UNC Mod 90 Development Workgroup, and provides a clear methodology for determining the format of the tender process to be commenced next year. As a point of clarity it would be appreciated if the GDNs or Ofgem could identify how any delay to the implementation of exit reform may impact on interruption reform.

We would note that in paragraph 2.9 (i) the SHQ is a voluntary requirement in terms of an offer for a tranche of interruptible capacity, however in paragraph 4.1 (e) it is a mandatory requirement. We would request clarity on this apparent inconsistency. Further under paragraph 3.2 it would appear beneficial if the GDNs could identify the minimum notice requirements for an ad hoc interruptible tender. Ideally it would be beneficial if the GDNs could identify the notice period that they would intend to give for some generic ad hoc invitations. This will provide certainty to Users as to the processes that they would need to follow for an ad hoc tender, and ensure that they had the correct procedures in place to participate in this.

I hope you find these comments useful, however please contact me should you wish to discuss these in further detail or have any questions.

Yours sincerely

A handwritten signature in black ink that reads "Stefan Leedham".

Stefan Leedham
Gas Market Analyst
Energy Regulation, Energy Branch