



Julian Majdanski
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11 September 2006

Dear Julian

EDF Energy Response to UNC Modification 100 “Amendment to OPN/SFN Submission Times”.

EDF Energy welcomes the opportunity to respond to this modification and offer our full support to its implementation. We believe that this proposal will significantly improve the accuracy of National Grid Gas’ (NGG’s) D-1 14.00 demand forecast, which in turn will have a positive impact on prices and balancing – as identified by Ofgem in setting NGG’s SO Quality of Information Incentive. We recognise that this proposal may have impacts on shippers with “downstream” interests of the NTS, however from our perspective will believe that this proposal will have no negative impacts on our operations.

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

EDF Energy actively uses the day ahead and within day demand forecasts provided by NGG to balance its position, and are therefore heavily reliant upon this information. We are aware that under the current regime NGG constructs its D-1 forecast with little, or no, knowledge of what the market’s intentions are in relation to offtakes from the system and flows from storage facilities. We believe that Users of these exit/entry points will have a far better view on how these points will operate at the D-1 stage than NGG, and so by communicating this information at the D-1 12.00 through an OPN/SFN submission, NGG will be able to develop a more accurate D-1 14.00 forecast. We believe that this will allow shippers to better plan their actions to balance their portfolio and enable the Transporter to operate its pipeline more efficiently and economically, in accordance with Standard Special Condition A11.1 (a).

The implications of implementing the Modification Proposal on security of supply, operation of the Total System and industry fragmentation.

EDF Energy believes that by providing a more accurate demand forecast at D-1 14.00 shippers will be able to balance their position more effectively with knock on impacts on security of supply, and reducing the number of balancing actions required of the transporter.

The implications of implementing the Modification Proposal for Users, including administrative and operational costs and level of contractual risk

EDF energy recognises that some minor adjustments of our administrative practices may be required, however we do not believe that there will any costs associated with these adjustments and believe that the benefits associated with the improved accuracy of NGG’s D-1 14.00 will greatly outweigh this. For clarity we currently submit our OPN submissions

several hours before the current 17.00 D-1 requirement and have not identified any significant operational issues with submitting OPNs at 12.00 D-1 or earlier.

The implications of implementing the Modification Proposal for Terminal Operators, Consumers, Connected System Operators, Suppliers, producers and, any Non Code Party

EDF Energy recognises that there may be some operational implications for parties with downstream interests. We also believe that implementation of this modification may improve the accuracy of the D-1 14.00 demand forecast, which will in turn have knock on benefits for Consumers and the market as the whole, as identified in Ofgem's consultation document on Quality of Information Incentives (Ref 88/06). We therefore believe that any costs associated with the implementation of this modification will be outweighed by the benefits that will be delivered to the market.

Yours sincerely

Stefan

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