

Tim Davis
Joint Office of Gas Transporters
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Dear Tim

EDF Energy Response to UNC Modification Proposal 0165: “Change to Measurement Provisions Change Process.”

EDF Energy welcomes the opportunity to respond to this modification proposal. We support the implementation of this proposal.

We believe that this proposal will ensure that non contentious changes to the NEA or NExA measurement provisions can be progressed without the need to raise a modification proposal and the associated consultation process, whilst ensuring that a route is available to registered Shippers to raise objections if required. We believe that this will improve efficiency in the implementation and administration of the code, and may possibly improve security of supply by ensuring that gas is not stranded due to the current consultation process.

In particular we believe that this proposal will:

- Allow the registered Users sufficient time to raise objections to a NEA or NExA Measurement Provision change that will detrimentally impact them. However we would also note that we are not aware of any objections being raised to the previous two measurement provisions change and so do not believe that this will be a regular occurrence.
- Ensures that where an objection is raised the registered User and any other interested party has the ability to raise these concerns in a public manner through the consultation process that is currently employed and understood.
- Ensure that where a NEA measurement provision change is required to allow additional sources of gas to flow to the UK, this additional gas is not stranded due to the consultation process, thereby improving security of supply.
- Ensure that where a NExA measurement provision change is required to satisfy additional demand, the ability to service this demand is not constrained by a consultation process.



I hope you find these comments useful, however please contact me should you wish to discuss these in greater detail.

Yours sincerely

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

Stefan Leedham
Gas Market Analyst
Energy Regulation, Energy Branch