



Tim Davis
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Dear Tim

EDF Energy Response to UNC Modification Proposal 0174: “Revised Tender Timescale for DN Interruption Arrangements.”

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

EDF Energy was an active participant in the Mod 0090 Development Workgroup, from which the new interruption model was developed and subsequently implemented. We are therefore slightly disappointed that these issues were not raised during the development workgroup discussions, however we recognise that timetables slip and issues are identified as the full consequences of proposals are understood. Given the level of the change that mod 0090 will introduce to the interruption regime, we believe that it is appropriate that sufficient time is provided to the GDNs to analyse the outcome of this tender and therefore their exit requirements, especially in the first year when the industry is exploring an entirely new regime. This proposal therefore represents a reasonable change to the UNC to facilitate the GDNs’ internal processes, and is a significant improvement over the original proposal raised by the GDNs. We therefore welcome the work that the GDNs have undertaken in developing this proposal and responding to User concerns, so that a suitable proposal has been developed and submitted.

In particular we believe that this proposal will:

- Allow the GDNs sufficient time to analyse and determine their NTS Exit requirements, thereby ensuring the efficient and economic operation of the pipeline system and satisfying SSC A11.1 (a) and (b).
- Enable the GDNs to conduct as full an analysis, as possible, of their capacity requirements to meet their 1 in 20 licence obligations in light of the results of the first tender for interruption. This will therefore facilitate SSC A11.1 (c).
- Ensure that Shippers have sufficient time after the April contracting round to meet with eligible customers and develop the bids that they may wish to submit. This will facilitate SSC A11.1 (d) the securing of effective competition between Shippers, as Shippers who have just won a new site in the April contracting round will be able to compete with Shippers who have retained a site, when submitting a tender bid.

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