

Julian Majdanski  
Secretary, Modification Panel  
Joint Office  
Ground Floor Red  
51 Homer Road  
Solihull  
B91 3QJ



15 January 2008

Dear Julian

**Re: Modification Proposal 0183 Provision of Data in respect of downstream networks by the iGT directly connected to the Distribution Network**

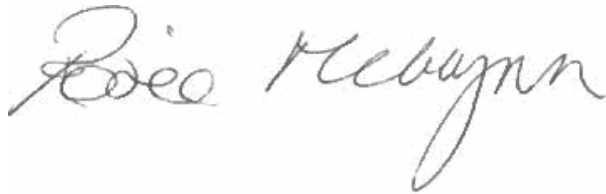
Thank you for the opportunity to comment on the above modification, EDF Energy offers qualified support.

EDF Energy welcomes the intent of this modification namely ensuring that the DN is provided with sufficient information of all the downstream connected networks. The work undertaken initially by the Gas Forum and more recently by Ofgem has highlighted the significant data quality and integrity issues which exist in relation to downstream networks.

This modification goes some of the way toward ensuring DN's receive the information they need however there is further work required to ensure that iGT's have the correct contractual framework in place to facilitate timely information provision. This modification places obligations upon the lead iGT which require co operation from the other iGT's involved in the nested CSEP without the support of an obligation on those iGTs' to provide information. To mitigate this issue a modification could be raised under the iGT UNC which mandates information provision between iGT's where nested CSEP's exist.

The modification states that only the lead iGT can submit data to the DN however without any associated change to the iGT UNC it is not clear how this could be managed / prevented. Without further clarity on how the lead iGT will be able to guarantee information provision from the other downstream networks we can only offer our qualified support at this time.

Should you require any further information please do not hesitate to contact me on 07875 111 488.

A handwritten signature in black ink that reads "Rosie McGlynn".

**Rosie McGlynn**  
Retail Regulation Manager