



Tim Davis
Joint Office of Gas Transporters
31 Homer Road
Solihull
West Midlands
B91 3LT

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Dear Tim

EDF Energy Response to UNC Modification Proposal 0185VV: "Meter Error Notification Process."

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

This proposal will provide additional transparency to the industry regarding meter errors and enable active participation in the discussions around them. Under the current 643 process Shippers can only become engaged in the meter error discussion at the very end of the process when the cause and impact of the meter error has been identified. This is despite the fact that discussions take place between the upstream and downstream Transporters prior to involving Shippers. This results in Shippers duplicating questions and discussions that have already taken place which cannot be seen as efficient.

In addition despite their being an unconstrained timetable for the identification and resolution of a measurement error, the timetable for shipper participation under 643 is very aggressive. This proposal has been developed on the back of the 131 review group with the aim of addressing these short comings and providing a Transparent and open forum for the discussion of commercially sensitive issues.

We fully support all of the points made in the modification proposal, and would also comment that this proposal has been developed with the support of both Transporters and Shippers. We would therefore note that this proposal should answer all of the industries concerns with the current arrangements.

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

Yours sincerely

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

Stefan Leedham
Gas Market Analyst
Energy Regulation, Energy Branch