

Email received 23 August 2013 from Natasha Ranatunga, EDF Energy

Lesley,

EDF Energy welcomes the opportunity to comment on the Entry Capacity Substitution Methodology Statement (ECS). We note that in its consultation covering letter NGG NTS indicated that it proposed changes to align the ECS references and terminology with the revised Gas Transmission Licence. We welcome the retention of the capacity terminology section within the ECS. It helps to provide industry with clarity over the Licence terms and illustrates how substituted entry capacity is treated.

We have identified a few editing issues which we believe should be clarified.

Ref	Document Ref	Issue
1	p4	Title: About the Statement (as per proposed ECR)
2	p4	Define NTS as per paragraph 1.
3	paragraph 10	Add the Licence reference for Legacy TO Entry Capacity (Special Condition 5F. Determination of Incremental Obligated Entry Capacity volumes and the appropriate revenue drivers to apply - Table 8).
4	paragraph 13	To assist stakeholders to find the document, can NGG add either a specific link or describe further exactly where the document could be found.
5	paragraph 32	Amend Network Code to UNC for consistency across document.
6	Diagrams 2 & 3	Update example dates from 2013 as Statement will be valid from January 2014.
7	Appendix 1	For clarity to industry, it would be beneficial if NGG inserted a footnote for 'Obligated Capacity' stating "This figure is made up from Licence Baseline Entry Capacity and Legacy TO Entry Capacity that has been adjusted for substitution".

Kind Regards

**Natasha Ranatunga**

Transmission and Trading Arrangements

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