

Email received 23 August 2013 from Natasha Ranatunga, EDF Energy

Lesley,

EDF Energy welcomes the opportunity to comment on the Entry Capacity Release Methodology Statement (ECR) and understand the rationale for undertaking the review earlier in the year in order to accommodate a further review if UNC modification proposal 0452 is implemented.

- We welcome the retention of the capacity terminology section within the ECR. It helps to provide industry with clarity over the Licence terms and illustrates how substituted entry capacity is treated.
- We are concerned that the revenue drivers need to be included within the Licence by an 'appropriate date' which is to be the day before the QSEC invitation letter is issued. Industry does not currently have visibility of this date; will NGG NTS publish this date in advance in order to maintain transparency?
- We also believe that the new ECR structure makes it easier for the reader to follow and that the explanation of proposed changes along with the track changed document is very useful.
- The inclusion of links to NGG NTS' website will assist industry to find associated documents which can be difficult to locate.

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

Ref	Document Ref	Issue
1	p5	Define NTS as per paragraph 1.
2	p5	Team name and department are different to what is in ECS statement.
3	Paragraph 5, first bullet	Licence definition is Non-incremental Obligated Entry Capacity.
4	Paragraph 34, first bullet	Licence definition is Non-obligated Entry Capacity.
5	Paragraph 46	Paragraph needs to be reformatted.
6	Paragraphs 42 or 66	Should Interconnection Point be defined within the Statement if not referred to in either the UNC or Licence?
7	Paragraph 77	Can NGG clarify which term is to be used here 'Developer or developer or Reservation Party'. Paragraph changes Developers to either developers or Reservation Party.
8	Paragraph 79	Currently industry does not have visibility of this date.

Kind Regards

Natasha Ranatunga

Transmission and Trading Arrangements

Corporate Policy and Regulation

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