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Date 01 April 2005

Dear Andrew,

Long Term Development Statements

Thank you for providing EDF Energy with the opportunity to respond to the above consultation on future arrangements for producing Long Term Development Statements (LTDS) by Gas Transporters (GTs). We have set out our views below in relation to the specific areas where you have sought views.

Scope and format of LTDS produced by the NTS and DNs

We agree with Ofgem that DN operators should be required to publish in their LTDS the following information:

- A full description of the development plans at LTS level (Local Transmission Level) including details of all expected projects and forecasts 10 years ahead
- Forecasts of demand at LDZ (Local Distribution Zone) level
- Updated information in relation to new significant investments including storage or large connected supply points similar to VLDMCs (Very Large Non Daily Metered Customers) on the DNs
- Updated information in relation to used/ unused capacity (ullage) across the network and a forecast view of spare capacity going forward in relation to demand and supply scenarios
- Likely commercial development plans including any relating to reform of existing exit arrangements.
- How development plans on the NTS relate to the development plans of the DNs and vice versa, taking into account LDZ demand and supply forecasts.

Format of LTDS for the NTS and DNs

EDF Energy believes that the format for NTS and DN statements should be similar to the format currently adopted by Transco in their Transportation Ten Year Statement. This would include the same formatting of tables and units of measurement.

Timing and publication of LTDS by the NTS and DNs.

In terms of publication timing, EDF Energy believes that both the NTS and DNs should co-ordinate their statements so that they are able to publish a single industry development statement. We therefore agree with Ofgem's timetable for DNs to publish their statement by the 30th September each year and 3 months before the NTS so that the NTS has time to consider and include any relevant information pertaining to their own statement.

We would also suggest a close working relationship in this regard so that methodologies and views are consistent and allow for constructive dialogue to evolve between the two parties which should ensure that the best available information and data is being made available to the market.

We hope that you will find these comments helpful. If you would like to discuss any of the issues raised in our response please contact myself or John Costa on 020 7752 2522.

Yours sincerely

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