

Jacob Kane
Office of Gas and Electricity Markets
9 Millbank
London
SW1P 3GE

Email to: Jacob.kane@ofgem.gov.uk

28 February 2014

Statutory Consultation on changes to Special Condition 1 of the Independent Gas Transporters' (iGTs) licence

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

We welcome the opportunity to comment on Ofgem's consultation on changes to Special Condition 1 of the iGTs licence. It is important that iGTs are regulated to the same extent and levels of efficiency as Gas Distribution Networks who are subject to a full price control.

- We agree that the proposed changes to Special Condition 1 will address some of the specific policy issues identified in Ofgem's May 2013 consultation.
- We note that in your letter on the statutory consultation it is stated there will be consultation on whether to remove paragraphs 12 and 13 of Special Condition 1 alongside similar paragraphs in licences held by electricity Independent Distribution Network Operators. We would welcome clarity on when Ofgem intends to undertake this review.
- There is one minor drafting error in paragraph 5(b): Entry-point is a defined term and the licence drafting should reflect this.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Natasha Ranatunga on 020 3126 2312, or me. I confirm that this letter may be published on Ofgem's website.

Yours sincerely,



Mark Cox
Head of Transmission and Trading Arrangements
Corporate Policy and Regulation

EDF Energy
40 Grosvenor Place, Victoria
London SW1X 7EN
Tel +44 (0) 20 7752 2200

edfenergy.com
EDF Energy plc.
Registered in England and Wales.
Registered No. 2366852.
Registered office: 40 Grosvenor Place,
Victoria, London SW1X 7EN