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9th June 2014

Informal consultation on the draft licence condition to implement the Electricity Ten Year Statement in National Grid Electricity Transmission plc's electricity transmission 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.

Summary

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Paul Mott on 0203 126 2314, or me.

I confirm that this letter and its attachment may be published on Ofgem's website.

Yours sincerely,

Mark Cox
Head of Transmission and Trading Arrangements

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Attachment

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EDF Energy's response to your questions

Question 1: Do you agree with our revised timetable for submission of the future scenarios to Ofgem?

We disagree with the removal of the obligation to consult stakeholders on the future scenarios for a minimum of 56 days. We believe that that WAS an "appropriate form of engagement with Grid's customers and other stakeholders". It is unfortunate to remove this minimum requirement; we do not wish to see that change made.

The proposed timing is otherwise reasonable : NGET must submit its proposed future scenarios to Ofgem by 31st January rather than 1st June. The ETYS is not finalised and published until November (leaving plenty of time for the 56 day consultation that was in the first draft of the new licence).

We note that Ofgem proposes to take 28 days to review and approve (or specify amendments to) the scenarios that are remitted to it by Grid, instead of the original proposal that Ofgem could have 42 days to do so. The original proposal seems more reasonable; we consider it beneficial to all that Ofgem have sufficient time to scrutinise the scenarios and discuss them with Grid if there are issues, and therefore would support the original proposal that Ofgem be given 42 days.

Question 2: Should NGET publish within-year updates to the ETYS focusing on changes to the contracted background? If so, how frequent should these be (e.g. quarterly or six-monthly)?

We believe that there should be quarterly updates, as per the initial consultation on this matter. It would be acceptable if on occasion, these specified no change other than changes in contracted generation background within the previous 3 months; however, the scope of the quarterly updates should not be explicitly limited to changes in contracted generation background.

EDF Energy
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