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Paul McGlone
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31/03/2015

Dear Paul,

EDF Trading's comments on the proposed changes to the recognition process for EU Guarantees of Origin for GB Fuel Mix Disclosure

We welcome the opportunity to comment on Ofgem's proposed changes to the recognition process for EU Guarantees of Origin (GoO).

Our suggestions include:

- the possibility to black out confidential information in the GoO cancellation statement;
- a degree of flexibility in the cancellation statement file name; and,
- the addition of a column for comments.

We have explained these suggestions in more detail below.

Possibility to black out confidential information in the GoO cancellation statement

Further to the questions we raised during the *Workshop on EU GoOs for GB FMD 2015* on 9th March 2015, we would like to reiterate our concern with providing GB electricity suppliers with the GoO cancellation statements that we receive from trading counterparties. The GoO cancellation statements include the name of sellers, which can be considered confidential information.

The specific section of the GoO cancellation statement we are referring to is the following table:

From	
Name of Account Holder:	Seller's Name
Account:	
Domain:	



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Street:	
Postal Code and City:	
Country:	

If the new process strictly requires that only GB electricity suppliers submit all relevant documentation for EU GoO recognition, we suggest that it should be possible for non-GB electricity suppliers to black out the relevant confidential text in the GoO cancellation statement and password protect the sheet. The concerned market participant (that is listed in the "Name of Beneficiary" field of the GoO Cancellation Statement) would then send a separate email to the CCL and REGO Team communicating the unique password. This would only be known to Ofgem and could be used by Ofgem in case access to the blacked-out information is required.

Cancellation statement file name

With regards to point 2.10 in the Draft new process guidance, it would be useful to have a degree of flexibility in the Excel file names that can be used for the GoO cancellation statements. Rather than a strict requirement to use the transaction number, we would suggest a requirement to match the file name with the value entered in the column "Cancellation Statement Transaction Number" on the Tab "Supplier INPUT DATA". Please note that some GoO Cancellation Statements issued in some countries (such as Spain) might not have Transaction numbers.

Addition of a column for comments

We would also suggest the addition of a Comments column after the last required column (X) to be completed by the Supplier, where additional information can be included.

Please do not hesitate to contact us, should you wish to discuss any of these comments further.

Yours sincerely,



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Regulatory Advisor

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