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Victoria Volossov
Ofgem
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Dear Victoria,

EDF Trading's response to Ofgem's statutory consultation on the proposed modification to Standard Licence Condition 1(1) of gas shipper licences

We appreciate the opportunity to comment on the proposed modification of the Standard Licence Conditions.

We agree with the proposed change to the definition of "day" in Licence Condition 1 (1), but would like to draw your attention to licence condition 3. Once the gas day changes to 5-to-5 in the NTS, shippers that deliver gas to the NTS from beach sub terminals that continue to operate on a 6-to-6 gas day will not be able to comply with licence condition 3.

Licence condition 3 sets out that:

The licensee shall not knowingly or recklessly act in a manner likely to give a false impression to a relevant transporter as to the amount of gas to be delivered by the licensee on a particular day to that transporter's pipe-line system or as to the amount of gas to be comprised in its offtakes therefrom on that day.

From 1 Oct, shippers that deliver gas to the NTS from 6-to-6 sub-terminals will nominate a 5-to-5 quantity to National Grid, but will at all times be allocated a different and unpredictable quantity of gas. Under the solution that is being developed to mitigate the mismatch, that quantity is the result of an adjustment that will scale 6-6 allocations to 5-5 allocations. This means that shippers will knowingly nominate volumes to National Grid that are different from what shippers expect they will deliver to the system.

Though we do not have a suggested solution for how this could be overcome at this point, it would make sense for Ofgem to ensure that shippers can comply with their Licences.

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

Yours sincerely,


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