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Office of Gas and Electricity Markets
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Statutory consultation: Modifying the electricity generation licence of Secure and Promote licensees – market making on the afternoons of the preceding business day to the 25 December and 1 January

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.

EDF Energy fully supports this change and welcomes the statutory consultation. We have previously informed Ofgem that as a 'Secure and Promote licensee' we have concerns with our market making obligations on the afternoons of the preceding business day to 25 December and 1 January. These concerns arise as the markets for primary fuels used for price derivation are effectively closed at these times. The effective closure of such markets has the effect of exposing obligated parties to undue risk in posting prices without having the vital information necessary to do this without a high degree of discretion.

We therefore fully support Ofgem's proposed licence amendments and the arguments presented in relation to the original intent of the licence condition which was to make products available when they are likely to be demanded, and create robust prices for those products when they are required.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact Sebastian Eyre on 020 7752 2167, or myself.

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

Yours sincerely,

A handwritten signature in blue ink that reads 'Paul Delamare'.

Paul Delamare
Head of Customers Policy and Regulation