



Steve Ladle
iGT UNC Representative
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LONDON
EC3R 8AJ

8th August 2007

Dear Steve

EDF Energy Response to iGT UNC Modification Proposal 003 - AQ Tables

EDF welcomes the opportunity to respond to this consultation, we **do not** support the implementation of this modification.

The introduction of the AQ values derived as a result of the 2006 AQ review would not better facilitate the relevant code objectives (d and f) for the following reasons. The robustness of the AQ Review process has been called into question following the 2006 Review. The substantial variations in values between the 2005 and 2006 Review indicates that there may be underlying process issues with the way the Review is carried out. The removal of thresholds has led to the creation of erroneous AQ values which are not reflective of actual consumption.

We do not support the proposer's view that the introduction of the 2006 values would mean that the "most up to date" values would be utilised. Once the 2007 AQ Review has been completed, those values will be the most recent. However as set out above, the AQ Review Process does not appear to be robust and requires a thorough review to ensure that it is fit for purpose

Yours sincerely

A handwritten signature in black ink that reads 'Rosie McGlynn'.

Rosie McGlynn
Retail Regulation Manager
Energy Regulation, Energy Branch