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Dear Andrew,

Consultation on the NTS Exit Capacity Release Methodology Statement (ExCR)

InterGen welcomes the opportunity to respond to this consultation.

As one of the UK's largest independent generators, InterGen is supportive of regular review and refinement of the NTS exit capacity release methodology statement (ExCR). Whilst simplifying the document to relate solely to the Enduring Exit Period, by deletion of Part A following the end of the Transitional Exit Period, reduces the complexity and improves understanding, the industry would be better served by the incorporation of the document in to the rules of the Unified Network Code (UNC). InterGen recommends this suggestion be investigated and implemented at the earliest opportunity.

InterGen welcomes the inclusion of text to provide for the implementation of UNC Modification 439, if approved. It is InterGen's position that the modification improves competitiveness within the industry and its approval and implementation is required to enable Users to respond appropriately to changing market conditions.

The proposed change to the way that User Commitment can be satisfied in specific circumstance as detailed in paragraph 89 is fully supported by InterGen. The current arrangement is overly onerous on Users who made increases to their Exit Capacity during the Transitional Exit Period and were required to submit an identical increase request for the start of the Enduring Exit Period, thereby triggering a User Commitment from 1st October 2012. This amounts to an effective User Commitment period of up to 7 years (depending on when within the Transitional Exit Period the request was granted) rather than the 4 years usually required. The proposed change addresses this disparity and removes the onerous burden which exists

purely due to administrative purposes as the regimes progress from Transitional arrangements to the Enduring Exit Period.

Yours Faithfully,

Scott Keen

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