

## Consultation on IUK's Reshuffling service

---

July 23, 2015

EDF and EDF Trading welcome the opportunity to comment on IUK's proposed Reshuffling. Please find our comments below.

We support the introduction of the potential for Reshuffling into the IUK Access Agreement and Code. Both the time shift (including after 1 October 2018) and the location shift could provide additional flexibility to shippers.

On the service itself, it is difficult to comment on the proposals without details of the Reshuffling Rules that would apply.

Based on the arrangements described, we suggest that the concept of the 'multiplier' that would apply to the value or volume of swapped capacity is eliminated. We suggest arrangements similar to the reshuffling services offered by Fluxys, where reshuffling is carried out against an administrative charge.

Concerning the capacity sales process to be held before 31 October 2015, we are not sure, in relation to the recent sales process, that it will make sense if the terms and conditions are similar due to the fact that this is a long term issue and that only a few months have elapsed between the two sales.

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

ooOoo