



Tuesday 25 October 2005

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**Response to UNC Modification Proposal 048 Preparation of Legal Text for User's Modification Proposals**

Dear Tim

E.ON UK supports this modification proposal.

We consider that this proposal better facilitates the relevant objective (f) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code, through ensuring that there is a more level playing field for both Transporter and non Transporter proposals, when requesting legal text to be drafted at the point where the Draft Modification Report is published.

Furthermore, the provision of legal text can greatly improve respondent's understanding of a proposal and therefore better inform their response and as a result, better support the Authority in making their decision. The Authority is also likely to have legal text available at an earlier date than might otherwise be the case and so this proposal may speed up the governance process.

We consider that any potential additional cost, resulting from the implementation of this proposal is immaterial, when weighed against the benefits of the efficiencies gained. Moreover, under the current arrangements, the potential always exists for legal text to be written and the proposal to be later rejected.

We do not agree that this proposal would reveal the voting preference of the Panel at an early stage; legal text should be requested to provide clarity for a proposal and should not be interpreted as support or otherwise.

We hope you have found these comments useful.

Yours sincerely

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