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Dear Bob

WWU offer the following comments in respect of UNC Modification Proposal 0341 "Manifest Errors in Entry Capacity Overruns".

WWU are sympathetic to the issue under consideration and that the overrun charge is significant, and potentially not of the magnitude considered when the original UNC drafting was agreed to protect against Users overrunning when booking entry capacity.

To that end, it may be appropriate to consider a ceiling or specific cap that prevents future occurrences impacted on Users to the extent highlighted within this proposal.

Similarly, consideration should be given to Users being alerted to any instances where there is an apparent error which is compounded day by day if it is left unresolved. WWU do not believe it is the responsibility of NGG to be the guardian of Users commercial positions, equally where there is information suggesting an 'obvious' issue, it would be prudent to proceduralise alerts to this effect. This in theory could be a User Pays service to ensure NGG were not operating beyond its current remit and providing value added services without reflecting the work involved.

WWU do have concerns concerning elements of the proposal. The role of Committee or Panel members as proposed, puts them in the role of experts/assessors in an area where for the most part they will have little or no experience. WWU are concerned that no amount of guidance would make up for this experience and knowledge shortfall, leaving voting members in a very difficult position.

Much debate has centred on the retrospective element of this proposal. This is an area that underpins much of the commercial certainty the UNC delivers. Accepting that the proposal seeks to explain why this retrospective issue is potentially in scope, WWU would welcome any view from Ofgem on its view to assist in this area.

I trust you find these comments helpful

Yours sincerely

Simon Trivella

**24 hour gas escape number**  
**Rhif 24 awr os bydd nwy yn gollwng**

**0800 111 999\***

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