

## Representation

### Draft Modification Report

#### **0340 - Clarification of the AUG Year in respect of UNC Modification 0229 (alternative)**

**Consultation close out date:** 14 February 2011

**Organisation:** **E.ON UK**

**Representative:** Brian Durber

**Date of Representation:** 11 February 2011

#### **Do you support or oppose implementation?**

Qualified Support

#### **Please summarise (in one paragraph) the key reason(s) for your support/opposition.**

We welcome the intent of 0340 to establish clarity around the date of the AUG year. However we appreciate concerns from LSP shippers that the 1 April date does not fit with the timetable for the production of the AUGS and so will not allow costs applied in April to be predicted. Therefore our preference is for UNC 0339A which balances the need for predictable costs with the need to apply costs to different market sectors on a fair and equitable basis.

Our comments on 0339A can be found in the document :

0339 **0339A – (Alternative to Mod 0339)**, Clarification of the AUG Year in respect of UNC Modification 0229

#### **Are there any new or additional issues that you believe should be recorded in the Modification Report?**

#### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

#### **Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

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### **Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

### **Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

*NB: while formal legal text has not been provided, Suggested Text has been included in the modification and comments on this will be helpful when the text is finalised.*

### **Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*