



Tim Davis
Chief Executive
Joint Office of Gas Transporters
51 Homer Road
Solihull
West Midlands
B91 3QJ

E.ON UK plc
Westwood Way
Westwood Business Park
Coventry
CV4 8LG
eon-uk.com

Monday 31 October 2005

Response to UNC Modification Proposal 047 Additional Data Requirements for DM Capacity Referrals

Dear Tim

E.ON UK offers qualified support for this proposal.

We agree that some of the additional data items required as part of this proposal will ensure that the Transporter has sufficient information to address the Capacity Revision Application in a timely manner. However, we consider that some of the additional information may, in fact, impede progress.

We are concerned that the additional items carry the same weight as the existing items, in so far as providing Transporters with an opportunity to reject a referred request and that these additional items could be seen to be being used by a Transporter to effectively 'stop the clock'.

The only justified piece of information, in our opinion, is the specific Meter Point Reference Number. This is entirely reasonable and is often requested at some stage in the existing process.

As we currently complete capacity amendments electronically, the proposal builds in additional manual process. In the event that this proposal is implemented, it seems sensible that there ought to be one point of contact with Xoserve for all Capacity Revision requests.

Specific issues:

New paragraph 5.1.11 It is stated that the User will procure permission for the Transporter to visit the premises and access thereto. Placing all the emphasis on the User to ensure site access could potentially lead to needless delay as it presents an opportunity for the Transporter to make minimum effort to gain site access and then use this to stop the clock.

E.ON UK plc
Registered in
England and Wales
No 2366970
Registered Office:
Westwood Way
Westwood Business Park
Coventry CV4 8LG

Proposed Annual Quantity (AQ) AQ review/management is a separate process. We fail to see how AQ values can be relevant in assessing whether or not capacity increase or decrease is acceptable. Whilst we agree that it would help Transporters to assess future demand, we cannot see how this would provide meaningful additional information, specific to the capacity revision process. As we would be unable to prove or warrant the accuracy, we would question the useful function such additional data might provide.

Intention or otherwise to install a compression or booster This is a pressure, not a capacity issue and is only relevant to offtake rate (SHQ) and not capacity (SOQ), therefore, were this modification to be implemented, it should only be required in cases where an increased SHQ is requested.

Proposed Load profile It is often difficult to obtain Load Profile information and therefore presents a potential delay, which can be particularly onerous in the case of revisions to avoid ratchet penalties. We would argue that much of this depends on what is meant by 'reasonable requests'. For example, it seems that annual profiles are relevant for capacity increases for non-seasonal loads, where the peak day will occur in the summer. For increases in SHQ, daily profile may be useful but what if the customer changes work/shift patterns?

This proposal may theoretically improve the efficient and economic operation of the pipeline system but in so doing, it may have limiting affects for ourselves and consumers. The additional information would certainly take time to obtain.

Furthermore, this proposal establishes circumstances under which Transporters may reject a referral request, in particular, where data items, including those additionally requested, are not provided. It could be argued that this provides a disincentive for Users to ensure that the data is accurate as Users may consider that it is better to send anything, irrespective of the accuracy, than to receive a rejection.

Please do not hesitate to contact me if you wish to discuss any of the above.

Yours sincerely

Christiane Sykes
Trading Arrangements
Energy Wholesale
02476 424 737