



Tim Davis
Joint Office of Transporters
51 Homer Road
Solihull
B91 3LT

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

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Response to UNC Modification Proposals:

053 Extending Established Uniform Network Code governance arrangements to include the Network Code Operations Reporting Manual referenced in Section V9.4

056 Extending established Uniform Network Code governance arrangements to include the Code Credit Rules referenced in section V3.1.2

059 Extending established Uniform Network Code governance arrangements to include the Network Code Validation Rules document referenced in Section M1.5.3

063 Extending established Uniform Network Code governance arrangements to include the GRE Invoice Query Incentive Scheme Methodology document referenced in Section S4.6

064 Extending established Uniform Network Code governance arrangements to include the CSEP Ancillary Agreement Document referenced in Section J.5.9

Dear Tim

E.ON UK supports implementation of the above proposals.

The proposals build on our previous proposal 730 Extending established Network Code governance arrangements to relevant Transco documents. We raised this proposal to ensure consistent treatment and apply established best practice to all Network Code Modification Procedures.

The above proposals will better facilitate the relevant objectives (f) the promotion of efficiency in the implementation and administration of the network code and/or the uniform network code and relevant objective (d) the securing of effective competition between relevant shippers, suppliers and/or between DN Operators and relevant shippers through improving transparency and accountability and creating a more level playing field, enabling both Users and Transporters to propose changes to the relevant documents.

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

The proposed arrangements would also ensure consistency with Ofgem's principles of good governance set out in their June 2003 consultation document, 'Gas Retail Governance – Further Consultation'.

We would support the creation of a list of the relevant documents, along with the creation of a section detailing common governance arrangements, which would better facilitate the administration of the network code and improve transparency. We would expect such changes to be developed within the Governance Workstream.

Yours sincerely

Christiane Sykes
Trading Arrangements
Energy Wholesale
E.ON UK
02476 424 737