



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

Thursday, 7th February 2008

**Response to UNC Modification Proposal 188 & 188A: Introduction
into the UNC of the Agency Charging Statement ("User Pays")**

Dear Tim,

E.ON UK does not support the implementation of Proposal 188 but we do support the implementation of the Alternative Proposal 188A.

The underlying principle of Modification Proposal 188 is sound as it attempts to aid in the facilitation of the 'User Pays' concept.

Considering the implications for the services provided to shippers by the GTs agent it is imperative that the principles of good governance are extended to include this document.

Referencing the ACS in the UNC as a Related Document (as defined in Section V, paragraph 12) would ensure that the governance of the document was more robustly managed and hence our preference for the alternative Modification Proposal 188A.

We also have concerns over the list of 'Code Services' that are defined within Modification Proposal 188. The proposal details a list of suggested Code ACS services which does not include Annual Quantity Speculative Calculations.

These are defined within the UNC, Section G 1.6.19 in which it is implied that the service will be delivered by the GTs via the UK Link system.

E.ON UK plc
Newstead Court
Sherwood Park
Little Oak Drive
Annesley
Nottinghamshire
NG15 0DR

www.eon-uk.com

Alex Travell
T +44 (0) 2476 181386
M +44 (0) 7879 802325

alex.travell@eonenergy.com
alex.travell@eon-uk.com

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



There is also a requirement on GTs within Section G 1.6.18 to provide reporting on the use of the Speculative Calculator by shippers. It is not clear how this requirement would be met if the service is not a Code Service within the ACS and potentially provided by numerous service providers.

Yours sincerely

Alex Travell
Retail Regulation
E.ON UK