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12 August 2008

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Dear Bob

**Response to UNC Modification Proposal 0192:
Introduction of DNO obligations to facilitate resolution of
unresolved USRV's**

One of the conclusions of Review Group 0158 was that a change to the USRV incentive mechanism, of itself, would not be sufficient to ensure that USRV's did not time out as a consequence of the limited invoice period introduced via Modification Proposal 0152v. One solution identified was the formulation of a 'backstop' mechanism. Proposal 0192 provides this.

Often the resolution of USRV's requires analysis involving historic data items that the incumbent shipper may not have access to. In many cases the only party that holds all the necessary records is the transporters agent.

Therefore it would seem appropriate that transporters, via their agent provide a backstop resolution service to ensure that invoices are released in a timely manner resulting in appropriate cost allocation.

A thirty month period is proposed to allow a User sufficient time to carry out the USRV resolution. If still unresolved the DNO would take over responsibility; this in itself is an incentive and should foster more proactive resolution behaviour on Users. It also allows for the User to put in place alternative commercial arrangements at their discretion.



We believe therefore that the Proposal serves two key objectives, firstly it introduces a new incentive by allowing a reasonable time for a User to resolve a USRV before moving to the backstop process and secondly it ensures that costs are allocated appropriately.

Consequently E.ON UK supports this Proposal.

Yours sincerely
Brian Durber (by email)
Retail Regulation