



Julian Majdanski
Joint Office of Gas Transporters
First Floor South
31 Homer Road
Solihull
West Midlands
B91 3LT

5 June 2008

Dear Julian

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

www.eon-uk.com

Please respond to:
Brian Durber
Tel: 01538 386923
Mob: 07768 031942

Brian.durber@eonenergy.com

Response to UNC Modification Proposal 0202: Improvement to More Frequent Readings Provisions to allow benefits of AMR

E.ON UK supports the principle that increased consumption information should improve settlement processes, we therefore welcome proposals that support this principle. However we have a concern with regard to Modification Proposal 0202 in that it seeks to mandate the use of AMR as a means of providing this additional consumption information for sites below 73,200 kWh annual usage.

We note that the Government have recognised the value of 'Advanced Meters' for certain business customers by introducing an amendment to the Energy Bill, mandating the installation of AMR for sites with annual consumption above 732,000 kWh. However they did not take the view that a robust business case existed for sites below this annual consumption threshold.

Whilst the Government's initiative is primarily involved in controlling energy usage and reducing carbon emissions, their conclusions on the case for AMR at smaller sites may help to inform the debate about the efficacy of AMR for gas settlement at smaller sites, at least on compulsory basis.

Notwithstanding, E.ON UK believes that whilst Users should have the facility to provide increased frequency of reads at their discretion, we do not believe that it is the role of UNC to mandate the means by which these reads are obtained. This is a commercial decision for the User. Shipping/supply businesses may have associated or subsidiary businesses engaged in the provision of meter reading services, these may or may not involve the use of AMR. Clearly the creation of industry business rules that favour certain of these businesses, would appear to



conflict directly with the relevant objective; the securing of effective competition between shippers and suppliers.

Therefore E.ON UK can only offer qualified support to this proposal.

Yours sincerely

Brian Durber (by email)
Retail Regulation