



Tim Davis  
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Dear Tim

**Re: Modification Proposal 0213V - Introduction of User Pays Governance Arrangements into the UNC**

Corona Energy (CE) offers qualified support to EDF's Modification 213V which seeks to introduce the principle of user pays arrangements into the UNC governance process. CE notes that EDF has developed this modification with the full support of the GB gas industry and has made efforts to meet the views of all UNC parties.

CE agrees that with the introduction of the User Pays principle into the Gas Transporter's licenses, changes to the UNC are now required to allow the alteration of non-core agency services or the creation of entirely new services. These changes need to include an appropriate framework for the allocation of any costs which arise from such changes.

CE agrees with EDF that modification 213V is now sufficiently developed to be implemented with considerable benefit in terms of clarity of the governance process to the UNC parties. This clarity will provide a framework for all new User Pays modifications which will allow them to progress more efficiently.

It should be noted that, as with any new regime, there are a number of areas where further work is likely to be required in the short to medium term. CE believes that the implementation of this modification should be viewed as the first and largest change in the governance process to allow the User Pays principle to operate effectively.

I trust these comments are helpful. If you have any queries regarding this response please contact me on 0208 632 8169.

Yours,

Richard Street\*  
Regulatory Affairs Manager  
Corona Energy

\*please note as this letter has been delivered electronically a signature will not be attached