

Mr. John Bradley
UNC Panel Secretary
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Our Ref. Your Ref.

6 November 2008

Dear John,

RE: Modification Proposals 0220: "Invoicing Arrangements for Late Payment"

Thank you for the opportunity to comment on this proposal. British Gas supports its implementation.

The industry is clearly reliant upon transporters, usually via their agent xoserve, raising invoices, and doing so in a fair, equitable and timely manner. Having reviewed the current Code wording in the light of this proposal, it would appear that current arrangements provide too much leeway for transporters in the matter of raising timely interest invoices. Indeed, we have first hand experience that the timing of the production of interest invoices can be highly variable. We therefore agree that a tightening of the Code is required in order to provide a backstop period by which interest invoices must be provided.

We agree with the proposer that implementation of this proposal would lead to more efficient administration of the UNC, further to A11.1 (f), and indeed more certainty for those reliant upon transporters for invoices.

Should you have any queries with regard to this response please do not hesitate to contact me.

Yours sincerely,

Chris Wright Commercial Manager