



Tim Davis
Joint Office of Gas Transporters
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6 November 2008

Dear Tim

Re: UNC Modification Proposals 0220: “Invoicing Arrangements for Late Payments”.

Thank you for the opportunity to comment on the above proposals relating to the creation of a responsibility for the timely issuing of Interest Invoices. Corona Energy (CE) supports modification 220.

The UNC is currently mute on the timescales under which Interest Invoices must be raised. In situations where a credit payment is due to shippers this could create an incentive on Gas Transporters to process debit invoices quicker than credit invoices.

The implementation of this proposal will ensure failure to issue Interest Invoices in a timely manner would result in a breach of the UNC. Shipper’s who experience inequitable treatment by a Gas Transporter would therefore have a route and mechanism to address this poor performance.

CE notes that the proposer has significantly revised and simplified this proposal following feedback from the Distribution Workstream. CE believes this has ensured that the proposal now provides a low cost solution to the problem, reflecting the relatively low level of materiality of the issue.

I trust these comments are helpful. If you have any queries regarding this response please contact myself or Richard Street 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