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6 November 2008

Dear Tim

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Response to UNC Modification Proposal 0220 Invoicing Arrangements for Late Payments

As proposer E.ON UK is in support of this Proposal.

UNC Section S provides for interest payments to be levied on transporters or shippers in respect of late payment of transportation invoices. However there are no timescales for transporters to issue invoices for such interest charges, either debits or credits. As shippers cannot issue these invoices themselves we feel that it is important to introduce some clarity around this process such that invoices are issued in a timely manner. We believe that a reasonable period for issue of the credit/debit interest invoice is 35 days.

This Proposal represents a relatively simple change and having consulted with shippers and transporters we feel confident that it will require no system changes for either party. The modification applies equally to debits and credits and so will ensure that neither shipper nor transporter is disadvantaged by the change.

We believe that this Proposal will better facilitate the relevant objective :-

Standard Special Condition A11.1 (f)

"... the promotion of efficiency in the implementation and administration of the network code and/or uniform network code..."

Yours sincerely

Brian Durber (by email) Retail Regulation