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November 4, 2008

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

Dear Bob,

RWE npower supports the implementation of Mod 0220. We agree with the proposer that the raising of an interest invoice and the time at which the Transporter issues such invoices to Shippers must be clarified within the UNC. RWE npower believes that by incorporating the proposed provision into the UNC, appropriate invoice behaviour would be ensured and maintained in a timely manner, thus eliminating the perverse situation where late payment costs are only recovered by a Transporter.

We also agree with the proposer that by stipulating in Section S of the UNC, that an interest invoice must be raised no more than 35 days after the date of the late payment, would clarify the timescales of when Transporters can raise interest invoice whether debit/ or credits to relevant shippers.

RWE npower supports the implementation date of 31 December 2008 as suggested in the Draft Mod Report. We believe this is achievable as there are no system or capital cost involved in this change and lastly, it should help to promote the efficiency in the administration of the network code/ or the Uniform Network Code.

Should you wish to discuss any of the above please do not hesitate to contact me.

Regards,

Sham Afonja

Gas Codes & Agreements Analyst

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