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Friday, 3 October 2008

Dear John,

RE: CODE MODIFICATION PROPOSAL 0222 - 'Amendment of Interconnector UK's Minimum Wobbe Limit'

E.ON UK **supports** the implementation of this Proposal.

We believe that this Modification Proposal offers a sensible solution to a problem encountered by Interconnector UK (IUK), which if left unresolved has the potential to restrict gas imports to the UK (or exports to the continent) via the Interconnector. This is due to a higher minimum Wobbe Index being specified in the relevant Network Entry and Exit Provisions (NEPs) than currently is required by the *Gas Safety (Management) Regulations 1996*. By amending the NEPs, IUK should be able to flow a wider specification of gas into the UK without any adverse impact on safety or security of the NTS.

The Proposer acknowledges that "*in some cases...more stringent requirements are set out for specific sites in their Network Entry Provisions or Network Exit Provisions (NEPs)*". Based on the proposer's representations, there does not appear to be any specific reason for the more stringent Wobbe Index requirements currently detailed in the relevant NEPs for IUK. Therefore, in the absence of any further information which may contradict this assumption, we support implementation of this Proposal. Should any additional, significant information come to light following consultation, then we would expect a re-consideration of the issue by National Grid NTS.

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We consider that this Proposal better facilitates the following relevant objectives, as set out in the Gas Transporter's Licence, Standard Special Condition A11.1:

- (d) The securing of effective competition between relevant shippers; and*
- (f) The promotion of efficiency in the implementation and administration of the...Uniform Network Code.*

The Proposal achieves these objectives by ensuring IUK is able to maximise its physical capability to transport gas into or out of the NTS by the removal of an unnecessary contractual limit. This should allow shippers to make better use of the Interconnector's ability to flow gas, expanding opportunities to trade gas on the wholesale market and thereby enhancing competition between shippers.

We believe it is appropriate and consistent with efficient implementation and administration of the UNC to consult on this Proposal via the Modification process, because it potentially affects a large number of NTS Users.

Yours sincerely

Richard Fairholme (by email)
Trading Arrangements
E.ON UK