



Tim Davis  
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9 April 2009

Dear Tim,

UNC Modification Proposal 242: "Changes to the window for the submission of Valid Meter Readings".

Thank you for the opportunity to comment on the above proposal relating to the extension of the performance parameters for the submission of meter reads. For the avoidance of doubt Corona Energy (CE) supports modification 242.

CE notes that with the rollout of smart metering and gas AMR the expected performance of shippers in the provision of reads is likely to change significantly over the next ten years. Generally we would expect these new technologies to shorten the read submission windows and improve meter read performance. In the interim however the current issues surrounding collection and validation of meter readings remain.

The implementation of this proposal will provide Shippers with a longer period to validate their meter reads. This will ensure that prior to the rollout of smart metering and AMR, more accurate meter reads are submitted resulting in a more accurate AQ and so a more accurate allocation of costs between Shippers. This proposed change would therefore reduce the RbD risk and be beneficial to competition through the more accurate targeting of costs.

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