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April 8, 2009

Re: Proposed UNC Modification 0281: "Introduction of an Implementation Timeframe for Modification Proposals"

Dear Bob,

On behalf of RWE npower, I would like to thank you for the opportunity to respond to the above titled UNC Mod Proposal.

RWE npower support the implementation of Mod 0281. We believe that 0281 provides a better solution than the current baseline method by providing more structure and greater clarity of likely implementation dates of modifications and brings the UNC more into line with the arrangements under the BSC and the CUSC. The inclusion of the requirement for a justification of the proposed implementation dates ensures that the Authority is aware of the benefits to industry participants of implementing modifications within the indicated timescales.

We agree with the rationale that the proposed change allows for improved efficiency in the discharge of the licensee's obligations and better promotes efficiency in the implementation and administration of the Code.

We believe that the proposed modification may not go far enough insofar as it does not provide a binding mandate for implementation to take place on the dates specified by the proposer. Further benefits could be gained by making the dates specified binding.

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

Regards,

Robin Healey

Dual Fuel Analyst

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