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Dear Tim,

Consultation Response: Modification Proposal 0123 (Urgent) - Provision of Demand Information to Meet the 14:00 Total System Demand Forecast

E.ON UK does not support this Urgent Modification and the associated implementation date. We believe that this particular proposal should have been considered and raised by the proposer at a much earlier stage in the modification process and such late notification introduces unnecessary financial and system enhancement burdens on Shippers.

We believe that this Modification Proposal highlights one of the weaknesses of the current UNC modification procedures which allow proposals¹ that are apparently “fully developed” to be sent straight out to consultation without due scrutiny by a Workstream.

Under the Electricity Balancing and Settlement Code (BSC) even the simplest of proposals are invariably referred to a modification group for consideration. This practice provides, where appropriate, the opportunity for any better alternative to emerge from expert discussion within such a modification group.

¹ The practice adopted by some Parties to allow consideration of draft proposals is helpful but in our view is not a good substitute for consideration of an actual proposal.

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We urge Ofgem to delay implementation of Mod 0100 by a further two months and to revise the urgent timetable for Modification Proposal 0123 to schedule in Transmission Workstream discussion. This would allow adequate debate of this new proposal and its interaction with Mod 0100 and associated timescales.

If you have any questions or queries regarding this response, please do not hesitate to contact me.

Yours sincerely

Richard Fairholme
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E.ON UK