

Julian Majdanski
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Dear Julian

UNC Modification Proposal 0152V, 152 VAV, 152 VB – “Limitation on Retrospective Invoicing and Invoice Correction”

Thank you for your invitation seeking representations with respect to the above Modification Proposals.

NGN believes all three of the proposals better facilitate the relevant objectives of the UNC and it is a matter of judgment which of the three is more appropriate.

The information provided by xoserve during the Review Group 0126 meetings demonstrated that an insignificant amount of unreconciled energy would be “lost” through the acceptance of any of the periods in question.

The amount of this “lost” value is the issue which potentially separates the stance of I&C and domestic shippers.

Review Group 126 assessment of the procedures and implementation of (any) proposals indicated that an implementation date of 1 April 2008 would be most appropriate for all industry participants. We would therefore encourage a swift decision from Ofgem to allow xoserve the necessary timeframe to align their system processes with any of the above proposals.

Yours sincerely

Robert Cameron-Higgs
Network Code Manager