

John Bradley Modification Panel Secretary Joint Office of Gas Transporters 31 Homer Road Solihull B91 3LT

8<sup>th</sup> December 2008

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## Re: UNC Modification Proposal 0235 "Recovery of Debt and Smearing of Revenues via Energy Balancing Neutrality"

Dear John

Thank you for the opportunity to comment upon this Modification Proposal, I can confirm that we, WWU, are fully **supportive** of its implementation.

This Modification Proposal has been raised following a review, carried out by the Energy Balancing Committee (EBCC), of the Energy Balancing Credit Rules and Section X ("Energy Balancing Credit Management") of the Uniform Network Code (UNC) Transportation Principal Document (TPD).

This review was undertaken, due to the recent uncertainty in the financial markets, as a proactive measure to ensure that energy balancing and credit arrangements are suitably robust and fit for purpose. We are fully supportive of such measures and recognise that this Proposal has the unanimous support of both the EBCC and the Transmission Workstream where this, and Modification Proposal 0233\* and Modification Proposal 0234\*\*, were developed and discussed.

We agree with the Proposer that implementation of this Modification Proposal would be expected to better facilitate the relevant objective contained within Standard Special Condition A11.1(c) & (d) of the Transporters licence. Implementation of this Modification Proposal will ensure that Users are not unduly discriminated against and costs are more appropriately allocated.

We therefore **fully support** the implementation of Modification Proposal 0235.

If you have any questions in relation to this Representation then please do not hesitate to contact me.

24 hour gas escape number Rhif 24 awr os bydd nwy yn gollwng

0800 111 999\*

<sup>\*</sup>Modification Proposal 0233 – "Changes to Outstanding Energy Balancing Indebtedness Calculation" raised on 31st October 2008

<sup>\*\*</sup> Modification Proposal 0234 – "To Correct Drafting Inconsistencies between Sections X and V of the UNC in Respect of User Default and Termination" raised on 31st October 2008



Yours sincerely

Simon Trivella Commercial Manager Wales & West Utilities