

John Bradley
Secretary, UNC Modification Panel
Joint Office of Gas Transporters
31 Homer Road
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11 June 2009

Dear John,

E.ON UK plc Westwood Way Westwood Business Park Coventry West Midlands CV4 8LG eon-uk.com

Richard Fairholme Trading Arrangements T 02476 181421 richard.fairholme@eon-uk.com

Re: UNC Modification Proposal 0250 - Introduction of Code Contingency Guidelines

E.ON UK fully **supports** implementation of Modification Proposal 0250.

We believe this proposal represents a significant step towards ensuring all Shippers are adequately equipped for the contingency arrangements during an unplanned outage or failure of the Gemini system. We agree with the proposer's reasoning behind the extent to which this proposal better facilitates achievement of the 'Relevant Objectives' and have nothing further to add in this regard.

It was noted during the Review Group 217 process, in which this proposal was developed, that during the last Gemini system failure, there were some Shippers who were inadequately prepared for the contingency or unaware of the arrangements which applied. It was also acknowledged that there was room for improvement by National Grid NTS, for example by adding clarity to Code contingency processes and improving communications. To this end, we believe it is critical to the success of the proposed arrangements that <u>all</u> Shippers and National Grid NTS are tested on their ability to cope with a Gemini system failure. We therefore welcome the proposal that Shippers and National Grid NTS will be tested on at least a biennial basis. It is important that all Shippers are aware of this responsibility that will be placed on them, if this proposal is implemented.

Yours sincerely,

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