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Dear Bob,

RE: Modification Proposal 0295 – “Allocation of Daily NTS Entry Capacity Within-Day”

E.ON UK (the proposer) **supports** implementation of Modification Proposal 0295. We believe that implementation of this proposal will serve to enhance certainty that bids submitted by Shippers for firm daily NTS entry capacity will be dealt with in a timely and efficient manner by National Grid NTS (NG NTS). Whilst we acknowledge NG NTS’s view that this proposal simply reflects what it endeavours to do as best practice already, we consider that codifying this process will enhance the current arrangements, by eliminating uncertainty and improving transparency for Shippers.

As set out in the Modification Proposal, we believe that implementation would better facilitate the achievement of the following Relevant Objectives:

SSC A11.1 (d) (i):

Should help secure effective competition between Shipper Users by not disadvantaging those Shipper Users who have submitted daily capacity bids and who are awaiting allocation of Daily NTS Entry Capacity at an ASEP. Undue delay by National Grid NTS and the resultant uncertainty may have adverse commercial implications on a Shipper User, if they are unable to flow gas whilst waiting for NG NTS to allocate capacity in response to their bid.

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Furthermore, by ensuring all daily capacity bids are dealt with in a timely fashion, Entry Shipper Users will gain commercial benefits from the enhanced certainty and timeliness of the daily entry capacity allocation process. This proposal removes the ability for NG NTS to exercise undue discretion over when to initiate the daily entry capacity allocation process and promotes the equal treatment of all bids submitted.

SSC A11.1 (f):

Will promote efficiency in the administration of the Uniform Network Code, by clarifying existing Daily NTS Entry Capacity allocation rules, removing (or at least reducing) the current scope for disagreement between Shipper Users and NG NTS, in respect of when a daily capacity bid must be accepted and capacity allocated.

Yours sincerely,

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