

## UNC Mod 0395 – Limitation on Retrospective Invoicing and Invoice Correction

The Major Energy Users Council (MEUC) supports the implementation of this modification; however we would hope that this is just an interim stage in a move to reduce back-billing even further as the graph in the proposal shows the real reduction in un-reconciled energy occurs between 0 and 1 year with only small movements in following years. In fact I believe the graph supports a move to 1 to 1+364 days.

This would help companies to close their books without the fear that a back-bill for energy is going to emerge some years after the event. One thing a company cannot do is go back to their customers and say “Oh by the way, I will have to charge you extra for those goods I supplied same years ago as my gas supplier has just sent me a back-bill.”

I would however say that I would not expect this limit to apply to consumers who have knowingly avoided paying for the gas they have consumed; this I believe is theft of gas and should be pursued vigorously.