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24 December 2014

Dear Phil,

**RE: Consultation on the compatibility of current planned UK Link downtime with UNC changes proposed in respect of the Nominations and Re-nominations processes at Interconnection Points, to ensure Great Britain's compliance with the new European Network Codes**

E.ON welcomes the opportunity to respond to this consultation. We offer the following comments in response to the questions posed:

**1. Do you agree with the pros and cons of each option? If not please explain.**

Yes.

**2. Are there any additional costs or benefits associated with any of the options identified?**

None that we are aware of at this stage.

**3. Do you believe that there are any other options that should be considered? If so, please provide details.**

No.

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**4. Which option or options do you believe comply with the Interoperability Code requirement to minimise system downtime in the context of the Re-nominations process at IP points?**

No particular view.

**5. Which Option would you prefer to be implemented?**

Looking at the issue from a Pan-European perspective, it is our understanding that National Grid is (possibly) the only Transmission System Operator which does not provide “24/7” availability of their systems. In contrast, the Shipper community works with systems and processes that are operational on a 24/7 basis. This makes the daily outage of Gemini seem outdated in our view.

Ideally, we would like to see the full 24/7 availability of Gemini (“Option 3”). We recognise, however, that National Grid has more insight to the inner workings of the Gemini system and understands in much more depth the necessity of a system downtime and as such we support the NG recommendation proposed here. On balance, we consider that a high level of system reliability for the normal operating hours is more important to us than full system availability during the ‘housekeeping window’.

**6. If you support option 2A, 2B or 3 would you consider User Pays to be the appropriate funding mechanism?**

Yes.

**7. Are there any other issues that you would like to highlight that have not been addressed within this Consultation document?**

Understandably, this consultation only focusses on the UK market, but of course flows across the Interconnection Points will depend not just on the UK market but also on the state of adjacent markets.



Yours sincerely,

Richard Fairholme  
Senior Analyst, Upstream Market Development  
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