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**Re: Consultation on National Grid NTS proposal to adjust investment lead times in respect of the release of incremental capacity in the 2006 QSEC auction**

Dear David

E.ON UK does not support the proposed changes to investment lead times.

Ofgem stated in their initial consultation on the Transmission price control review, the importance of ensuring 'licensees bear an appropriate share of the risk of underperformance under the price controls in relation to, for example, the cost of buying back capacity rights if investment by a licensee is not focused and timely'.

The changes proposed risk undermining these fundamental incentives, through allowing NGG to tip the balance of risk, which was originally put in place to ensure focused and timely investment, away from NGG NTS and allocate more risk towards shippers, for events outside the control of those shippers.

Yours sincerely

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