

Centrica plc Legal & Regulatory Affairs Millstream Maidenhead Road Windsor Berkshire SL4 5GD <u>www.centrica.com</u>

Dan Norton Deputy Director, Price Protection Ofgem 10 South Colonnade Canary Wharf London E14 4PU

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By email to: Retailpriceregulation@ofgem.gov.uk

Dear Dan

Price Cap – Removal of the cap end date from licence conditions¹

Centrica welcomes the opportunity to respond to the above consultation in which Ofgem proposes to modify Standard Licence Condition (SLC) 28AD in the gas and electricity supply licences to reflect changes made in the Energy Prices Act 2022.

We agree that changes need to be made to accurately reflect the new legislation, to prevent the cap from ending prematurely, and to avoid any confusion from potential differences between legislation and SLCs and models. Insofar as this is what the proposed drafting changes achieve, we have no substantive comments on the licence text itself at this time.

However, we note that further consultation will be necessary in relation to price cap models given that, at present, these models cease their calculations at the end of 2023, when the price cap was originally set to expire. While we welcome Ofgem's recognition of the need for further consultation on this aspect, we urge Ofgem to ensure all proposed changes are fully explained and to allow stakeholders adequate time to review and respond given the technical nature of the subject matter and materiality in the event of error. We reserve the right to comment further on proposed amendments as necessary in the light of the further consultation.

Finally, we understand that the proposed licence amendments are relative to the SLCs as they stand following the recent move to quarterly cap changes.² These changes are not yet reflected in the consolidated versions of the supply licences published on Ofgem's website.³ While we note Ofgem's disclaimer regarding reliance on its electronic public register, it would nevertheless be helpful if Ofgem could ensure that any changes (or proposed changes) not yet consolidated are clearly signalled in future consultations to avoid any possible confusion.

- ² Price cap Decision on changes to the wholesale methodology | Ofgem
- ³ Licences and licence conditions | Ofgem
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Yours sincerely

Don Wilson Market Design and Policy