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By email to: Retailpriceregulation@ofgem.gov.uk

Dear Dan

Price Cap - Statutory consultation on removal of the cap end date from licence conditions | Ofgem¹

Centrica welcomes the opportunity to respond to the above consultation.

We agree that licence changes need to be made to accurately reflect changes made in the Energy Prices Act 2022, to prevent the cap from ending prematurely, and to avoid any confusion from potential differences between legislation and SLCs and models.

We have no substantive comments on the licence text contained in the Modification Notice. Our comments below are confined to the model revisions set out in the accompanying annexes:

Draft Annex	Tab	Issue
Annex 2 – Wholesale cost allowance methodology	3b demand	<p>We note that list of bank holidays included in column C does not include the forthcoming 8 May 2023 holiday.</p> <p>While this omission does not in itself appear to influence any output, we presume changes to future bank holidays could potentially have an impact so will need to be kept under review.</p>

¹ [Price Cap - Statutory consultation on removal of the cap end date from licence conditions | Ofgem](#)
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Annex 2 – wholesale cost allowance methodology	Multiple (see next column)	<p>We suggest Ofgem could simplify the model further by removing a number of columns that are no longer necessary (mostly related to transitional weightings from last year), specifically:</p> <p>In 2a (iii): Columns D:K and AX:AY In 2b (iii) and 2c (iii): columns X:Y In 8b (ii): columns D:O, AK and BC:BF In 8b (iv): columns D:K, M:N, R:T, X:Z In 8c (ii): columns Y:AC In 8c (iv): columns J:N In 8d (ii): columns Y:AC In 8d (iv): columns J:N</p>
Annex 4 - policy cost allowance methodology	3i New FIT methodology	Cells T204:AW211 – we note that the formula has not been dragged down/across to calculate the FIT Levelisation Fund in these cells

Yours sincerely

Don Wilson
Market Design and Policy