

Good afternoon,

I am writing on behalf of Centrica with regards to the proposed urgent change to the Entry Capacity Statement, specifically the proposal to allow National Grid Gas to withdraw capacity from sale in weekly and monthly auctions at the Milford Haven ASEP in the period between 30 May and 31 October 2022, in the situation of a foreseen constraint.

We are supportive of this change.

While it would reduce the entry capacity at Milford Haven, we do not see it having a material impact on the price and volume of gas in GB this summer. We understand that the Milford Haven region has congestion issues and therefore we believe it is right to make this change to reduce congestion costs, which would otherwise be passed on to shippers and subsequently consumers.

However, we note that this is a short-term change for this summer only and therefore we recommend that National Grid Gas is considering how in the longer term it will manage future congestion issues on the gas network, especially when considering that there will need to be a shift to more LNG imports to better achieve energy independence from Russian Gas. National Grid Gas should consider whether it could shift to prioritising supply centres close to higher consumption areas in the future to avoid similar issues.

Finally, we would like to highlight that we see this is a specific and time-limited case. Ofgem and National Grid Gas should not be relying upon urgent timescales to make changes that affect gas shippers and LNG businesses. While we accept the volatile market and the exceptional geopolitical context, such late changes are unhelpful for business planning.

Please feel free to contact me if you would like to discuss further  
Jack



**Jack Presley Abbott**

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