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4 July 2022

Sent by email to: office@apcs.at

Public consultation 9 – GTC-BGC 1.4 Termination of the contractual relationship

Dear Sirs and Madam

In reference to APCS's proposal on changes to GTC-BGC 1.4 Termination of the contractual relationship, Centrica Plc welcomes the possibility to provide the following comment.

Centrica supports the proposal as we believe that trading balancing groups should operate with the objective to support the system balance as much as possible. Market participants play an important role to help balance energy flows in a cost-efficient manner.

However, we would welcome a definition of APCS's yardstick criteria on the frequency, duration and extend of imbalance energy use that contradicts the system serviceability for the assessment of when those criteria are exceeded, and punitive action might be taken to avoid disputes on a case-by-case basis and help to set operative boundaries. It is challenging for market participants to forecast the system imbalance and therefore unintended balance group deviations might occur to a certain extend. Additional clarity on the assessment criteria will therefore help to limit these unintended deviations.

Further, we would be grateful for more clarity on how the assessment would be done, e.g. would that competency lie within a single person or rather following a defined process with several layers of assessment and decision making.

Centrica would like to encourage the APCS to thoroughly assess the outlined arguments and take them into consideration in their final decision. We look forward to engaging with APCS on the points highlighted in the letter and remain available for discussion.

Yours sincerely

Cathrin Stadler
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