



PETCO Trading (UK) Ltd
One New Ludgate, 9th Floor
60 Ludgate Hill
London EC4M 7AW

13th March 2023

Chris Logue
Head of Markets
National Grid

Dear Chris,

RE: National Grid Transmission's Consultation on Entry Capacity Release Methodology Statement ("ECRMS").

Thank you for the opportunity to comment on the latest proposed changes to the ECRMS.

As stated in our previous responses submitted on this matter, (26th April 2022 and 11th January 2023) PETCO Trading (UK) Ltd, (PTUK) continue to be disappointed with the ongoing uncertainty and challenges we face in running our business resulting from the ongoing short-term amendments to the operating environment.

Whilst we appreciate National Grid's attempts to introduce flexibility into the latest capacity release methodology statement via potential dynamic alignment with the Gassco maintenance schedule, unfortunately short-term revisions to and uncertainty as to the future availability of entry capacity provides an unacceptable level of risk to LNG suppliers given the typical timelines involved in contracting for cargoes in the LNG market.

Therefore, our position has not fundamentally changed from that set out in our previous responses to you in that we continue to be disappointed that the existing constraint management tools formulated for National Grid to address exactly these types of issues are being abandoned in favour of shifting the risk associated with a lack of long-term investment in the capability of the network to LNG shippers and suppliers.

National Grid has stated that "...investment in the physical network to increase the Milford Haven summer capability would take a number of years to deliver" and so again would encourage National Grid and Ofgem to address this and highlight what is being done in this area to alleviate market participants concerns that this issue is becoming an annual exercise which will serve to reduce the longer-term attractiveness of Milford Haven as a destination for LNG cargoes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "S. Parle".

Stephen Parle

Head of Strategy & Business Development

PETCO Trading (UK) LTD

Open

PETCO TRADING (UK) LIMITED

Registered in England under company number 06695912

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