

Number	Party	Comment	BritNed Response
1	EDF	Concerning the timing of the day ahead explicit auctions, we consider them to be a bit late, especially the ATC publication and the bids submission . At least 30 min prior to the suggested deadlines would be a good improvement. It would mean to have the ATC around 9:00 CET instead of 9:35 CET	The timings will be changed for the daily explicit auctions. The ATC will move to 09:00 CET
2	EDF	For the suggested nominations deadlines between 12:30 and 13:30, we recommend to extend this deadline to 14:00 in order to provide the scheduling/operations team more time to nominate the day ahead flow. Also 14:00 D-1 is the deadline for most of the other day ahead cross border flow nominations.	It would not be possible for BritNed to extend this deadline to 14:00 due to our own submission deadline to submit to TenneT.
3	EDF	BritNed, NEMO Link, and IFA should coordinate and harmonize the timing of those day ahead explicit auctions, instead of having 3 different timings for each interconnector. It would make more sense that bidding capacity on all interconnectors with UK are done at the same time in the morning of D-1.	BritNed is aiming to harmonise its timings with NEMO for the Daily Explicit.
4	EDF	These day ahead explicit auctions have never been performed in the past (even as fall back solution which never occurred). Tests with market participants should start as soon as possible and not later than early January 2019 in order to provide enough time for counterparties to adapt their scheduling, nominations and IT process.	Testing should start week commencing 14 January 2019.
5	EDF	Regarding intraday, as we already discussed this topic, we would like to see improvements on the intraday access, especially for the capacity auctions and the nomination windows. We need to be able to have more nominations windows and closer to real time to re-optimize the BritNed cable in the most efficient possible way. We hope to have those “quick wins” to be implemented by September 2019 .	BritNed takes note of this comment and will take it into account when developing future Intra-Day auctions

6	Engie	<p>We read in the document the proposed timing:</p> <ul style="list-style-type: none"> - ATC publication @ 09:35 - Bids Submission between 09:50 > 10:15 - Results between 10:20 > 10:40 - Nominations between 12:30 > 13:30 <p>We also read in the currently ongoing consultation for NEMO link the following timing: 09:00 D-1 is the deadline for auction specifications to be published on the Auction Platform and ends at 09:30. The Auction Platform then calculates the results after the auction closes and will publish the provisional results as soon as possible.</p> <p>We suggest Britned to have close collaboration with IFA and NEMO in order to harmonize the timing for bid submission, results communication and nominations. We appreciate to have the NTC published as soon as possible and hence, welcome the proposed timing of 09:00 for NEMO.</p>	BritNed is aiming to harmonise its timings with NEMO for the Daily Explicit.
7	Energy UK	consultations lack, in our view, a more detailed specification of the exact timelines for triggering the contingency planning, should the no deal Brexit scenario materialise. We would therefore appreciate some more clarifications on that specific point.	Contingency planning timelines are not the purpose of the Access Rules consultation. A separate notice would be sent out to as soon as practicable that should cover these points.
8	Energy UK	<p>In addition, we would also welcome clarity at least on the following three points:</p> <ul style="list-style-type: none"> - The proposed timing for the explicit day-ahead auctions; - The proposed rules for firmness of long-term and day-ahead capacity (incl. will the market continue to receive the day-ahead market spread in case the interconnector capacity is unavailable. How would the day-ahead market spread be calculated?); and - What the use-it-or-sell it rule will be for non-nominated long-term capacity? Will it be paid the clearing price of the day-ahead explicit auction? . 	There is no market spread as for Day-Ahead Explicit there would be only the Clearing Price.
9	Energy UK	Given the importance of the issue, we would also suggest that National Grid (NG) organises a workshop, with the aim of explaining all these details across to the market participants, across the portfolio of NG interconnectors.	BritNed believes this would be a point to raise with National Grid and is out of scope of this consultation.