



Consultation - BritNed Access Rules 2019

BritNed are planning (should Brexit permit) migration to new capacity allocation systems in December 2019, and are consulting on proposed modified BritNed Access Rules to support this implementation.

New platforms will be as follows:

- Single Allocation platform (for Long Term capacity allocations, and Day Ahead Fallback explicit allocation).
- Intraday Auction platform (enhanced explicit Intraday auction process)
- Regional Nominations platform (for BritNed Nominations, all timescales).

BritNed would like to invite feedback from Market Participants on the following consultation documents.

- BritNed Access Rules

Other documents that will make up the suite of BritNed Access Rules are attached below. There are no modifications proposed to these other documents within this BritNed consultation as they are all owned by the all-TSO community, and hence they are provided here for information.

- Harmonised Allocation Rules
- BritNed border specific annex to the Allocation Rules GB – NL border
- Shadow Allocation Rules
- Channel Long Term Nomination Rules

The latest date for responses to this consultation will be 18.00 CEST on 2nd August 2019.

All responses should be titled “Response to BritNed Access Rules Consultation, 5th July 2019” and are to be submitted via email to customer.enquiries@britned.com

Changes to the BritNed Access Rules



The below is indicative of the changes made. Only changes made in the document are legally binding.

Section A

A2.2 new text. any reference in Chapters 2 and 3 to Long Term Transmission Rights shall equally apply to Day Ahead and Intraday Transmission Rights ~~the participation in Day Ahead and Intraday Auctions requires compliance with provisions related to collateral as specified in Chapter 3 (Collaterals) of the Allocation Rules.~~

A2.5 Removed.

A3 Removed

A4: Regulatory and Legal Requirements now A3.

A5 Costs of Participation now A4

A6 Registered Participant Forum now A5

A7 Collusion now A6

A8 Removed

A9 Information System Rules now A7

A7 Addition of text: "and Nomination Rules" to each article.

A7.7 Removed

A10 Bids now A8

A11 Intraday Allocation now A9

Section B

B1.3 Removed



B2.1 (a) (b) (d) (e) (f). Remaining articles renumbered accordingly.

B2.1 (g) Addition of text “and/or Luxembourgian law”

B2.3 removal of text “a consolidated”

B3.2 removed

B3.3 removed

B5 and B6 Removed

B7 Payment Security now B5

B5.10 Removed

B5.11 Removed

B5.13-B5.19 Removed. All remaining articles renumbered accordingly.

Section C

C1.0 Removal of text “shall be the total technically available Transmission Rights. Addition of text “and Intraday Auctions”

C1.1 Correction of reference to C1.19

C1.1 (a) removed. Remaining article renumbered accordingly. References Adjusted.

C1.2 removed. Rest of articles in article renumbered.

C1.3(c) addition of “long term”

C1.13 removal of “no later than two (2) hours

C1.15 (a) removal of “and within (30) minutes”



C1.27 Removed

C2 Removed. Subsequent article renumbered accordingly.

C2 Renamed Implicit Day Ahead Fallback.

The Allocation Platform will, ~~subject to paragraphs (b) and (c),~~ conduct explicit Day Ahead Auctions based on the Shadow Allocation Rules, for Units having a Product Period of a Contract Day, in accordance with this Rule C2, as a fallback of the Day Ahead Implicit Auction ~~in circumstances where time permits an explicit Day Ahead Auction to be scheduled (but not otherwise).~~

~~(b) Where time does not permit an explicit Day Ahead Auction under paragraph (a), the fallback of the Day Ahead Implicit Auction shall, subject to paragraph (c), be the explicit Intraday Auction. In the time period where there is no Shadow Allocation available or it fails, the Intraday explicit Auction shall be the fallback for the Day Ahead Implicit Auction.~~

~~(c) In respect of periods in relation to which the Allocation Platform has given notice in accordance with Rule A11.1 that an Implicit Intraday product is available, the fallback of the Day Ahead Implicit Auction shall be the Implicit Intraday Auction.~~

(c) The Use It or Sell It compensation in case of fallback for the Day Ahead Implicit to the Shadow Allocation, as per C23.1(a), shall be the ~~Weighted Average Marginal~~ Auctional Price from the Shadow Auction.;

(d) The Use It or Sell It compensation in case of fallback for the Day Ahead Implicit Auction to Intraday explicit Auction, as per C23.1(b), shall be the ~~Weighted Average Marginal~~ Auction Price from the Intraday explicit Auction for the Units that are sold in this Auction ~~cleared capacity~~. Any Long Term ~~Allocated~~ Units that are not ~~cleared~~ ~~sold~~ offered in the Intraday Explicit Auction shall be compensated based on the Weighted Average Marginal Price of the corresponding Long Term Auction in which these ~~it~~ ~~were~~ ~~as~~ ~~purchased~~ allocated.

C3.6 (old) removed

C4 Intraday Auctions now C3



C3.5 new text added “with a minimum but limited to”

C3.6 (new) Removed.

C3.7 New Article : The allocated capacity in an Intraday Auction which has not been nominated before the gate closure of the last nomination gate before the next Intraday Auction will be returned to the Allocation Platform to be offered in the next Intraday auction, without compensation to the previous owner of the Transmission Rights (Use It or Lose It principle is applied)

C3.8 The Allocation Platform has the right to restrict the offered Intraday Transmission Rights in the Intraday Auction for the purpose of limiting the ramping of the flow between different MTU’smarket time units.

C3.9 Fifteen changed to Five

C4.12 Addition of Text “A Manifest Error will not be corrected by the Allocation Platform in any instance.”

C4.13 Additional text “for intraday Auctions”

C4.16 additional text “Long Term Auctions, explicit”

C4.17 removal of text “this bid shall be considered as delivered when the Allocation Platform sends an acknowledgement of receipt to the Registered Participant”

C6 now C5

C6.2 (old) and 6.3 removed.

C6.4 removed

Section D

D1.4 Reference corrected



D2.2 Removal of text: “The timescales for submitting Nominations are contained Schedule 4”

D2.19 Addition of “long term” and “intraday”

D2.22 Additional text “For the avoidance of doubt, The Allocation Pplatform shall not pay any positive charges which arise fromof such a failure as described in Rule D2.22 to the Unit Holder.

D2.25 New article : Unit holders may assign other parties to fulfil any of the obligations under Rule D2 as Nominator on its behalf.

D3, D4, and D5 removed.

D6 Use it or Lose It now D3

D6.1 (old) removed text “the means by which” replaced with “how”

D6.2-6.4 removed. References in article corrected.

D6.7 (d) additional text “ for the same business day”

D6.7 Additional sub bullet – (e) (d)(e) Any Unit which has not been nominated in the last nomination gate before an Intraday Auction for the same business day is considered as an Unused Unit

D7 Outages now D4

D7.2-7.5 removed



D8 Curtailment now D5

D8.6 (old) additional Text: In the circumstances described in Rule D5.1, the Intraday Transmission Rights of all Unit Holders in an affected Settlement Period in the direction of the Capacity Shortage will be Curtailed by the Allocation Platform under this Rule D5, where applicable, and each relevant Unit Holder will lose all its entitlement to use Intraday Transmission Rights.

D9 Curtailment Reconciliation now D6

D9.4 and 9.5 removed

Section E

E4.2 Removal of text “and in any event not less than ten (10) Business Days, to review and give written comments to the Allocation Platform on the proposed amendment. If the Allocation Platform decides to modify a proposed amendment as a result of comments from Registered Participants, they may give Registered Participants a further opportunity to review and comment on the modified proposals under this Rule indicating timescales for provision of such comments.”

E4.3 removal of text “later of:

the start of the Contract Day commencing 10 Business Days after the Amendment Notice is notified to Registered Participants by the Allocation Platform; or the”



E4.5 removal of text “in the event that” replaced with “if”

E4.11 removed

E4.13-4.14 removed

Schedule 1

Part 1 Definitions

New Definitions

Nomination Tool - means the IT system used for processing nominations;

“Shadow Allocation Rules” means the means the Joint Allocation Office Shadow Allocation Rules for day ahead explicit fallback allocation, pursuant to the Channel TSOs proposal for fallback procedures

“Shadow Auction” means the Daily Explicit Auction run by the Allocation Platform(s) by which daily Cross Zonal Capacity is offered as fallback procedure for the Day Ahead Implicit Auction and allocated to Registered Participants who submit Bid(s)

Removed Definitions

Standard Training

Nomination Participation Agreement

Schedule 2

Removed

Schedule 3

Removed



Schedule 4

Now Schedule 2

Part 3

3.1 – 3.10 removed

Part 4

Now Reads : 4. Day Ahead explicit shadow Auction (this is the fallback to the Day Ahead Implicit Auction)

The fallback for the Day Ahead implicit Auction will be operated in line with the JAO shadow allocation rules

Part 5

5.3 Intraday Unit with a Unit Validity of 00:00 to 15:59 hrs of the Contract Day D – Removed

5.4 now reads “...for the period of time corresponding to the latest intraday auction of the Contract Day D in each direction, pursuant to Rules D1, no later than 10 minutes after the end of the auction (or at any other time specified in advance by the Allocation Platform).”

5.5 5.5 now reads “Unit Holders can submit Intraday Mid North Sea Nominations of Intraday Units with a Unit Validity Time of 00:00 to 23:59 hrs of the Contract Day D, from the respective nomination gate opening until the closure of the nomination gate, as detailed in the table below.

5.6 to 5.25 Removed

Table: Timings changed.

Schedule 6 and 7

Removed.