

# AGENDA PARTICIPANTS' FORUM

WELCOME

2 COMMERCIAL UPDATE

3 EU CBAM

4
OPERATIONAL UPDATE

- TEA & COFFEE -



# AGENDA PARTICIPANTS' FORUM

5 EMPIRE UPDATE 6 REMA:

An Update on the REMA Decision

UK-EU COOPERATION:

The reintegration of the UK into the Internal Energy Market

- QUESTIONS -



## OUR SPEAKERS



GINEKE VAN DIJK
COMMERCIAL DIRECTOR



PHIL SPAIN OPERATIONS DIRECTOR



JON COLE
CUSTOMER & MARKETS MANGER



KICK VAN HOUTEN
COMMERCIAL OPERATIONS & PLANNING MANGER



MAITRAYEE BHOWMICK-JEWKES

**SENIOR REGULATORY ANALYST** 





## COMMERCIAL TEAMS

**2025 UPDATES** 



Key Empire Updates

## CUSTOMER & MARKETS

BritNed Flows and Auction Performance

Customer Satisfaction and Feedback

## POLICY & REGULATION

UK and EU Bidding Zone Reviews

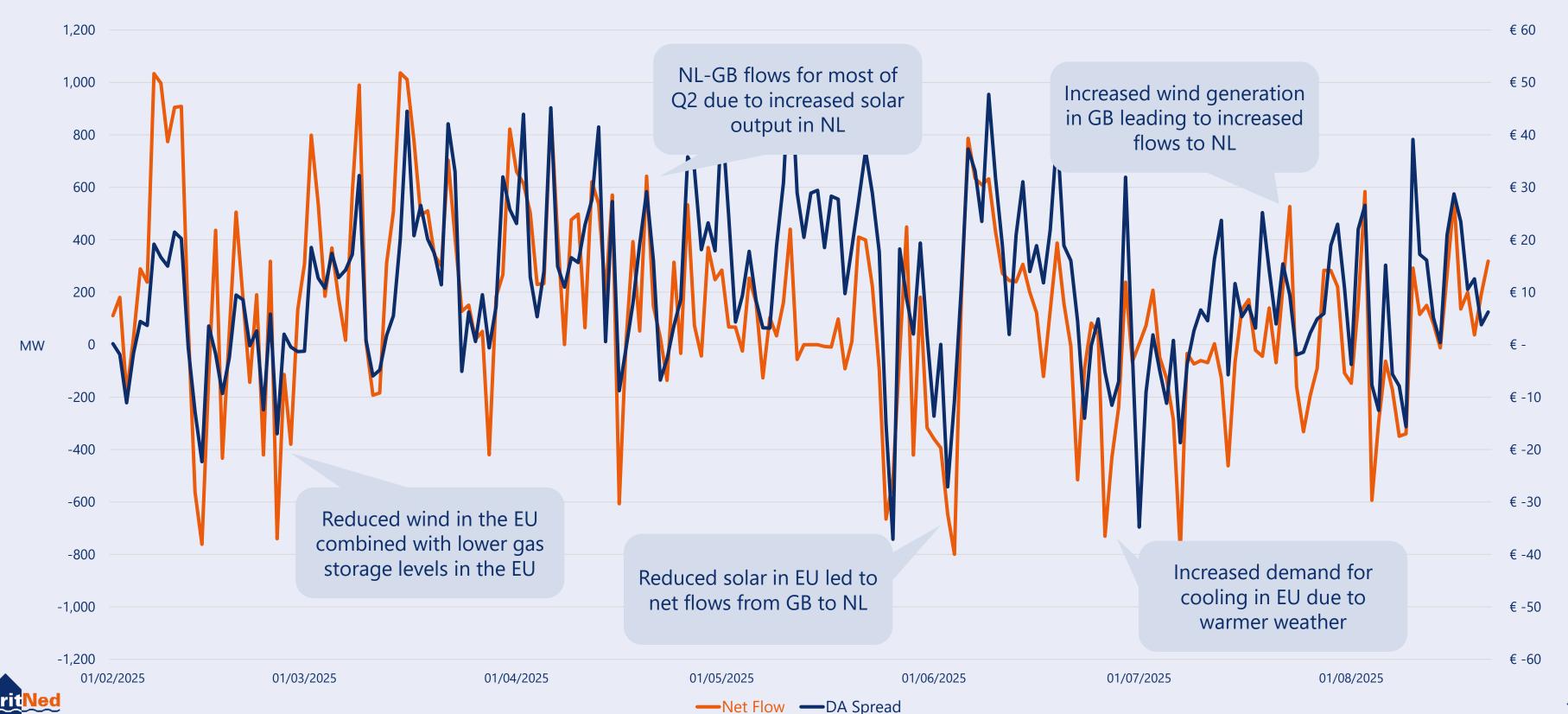
UK-EU Cooperation

Access Rules Updates



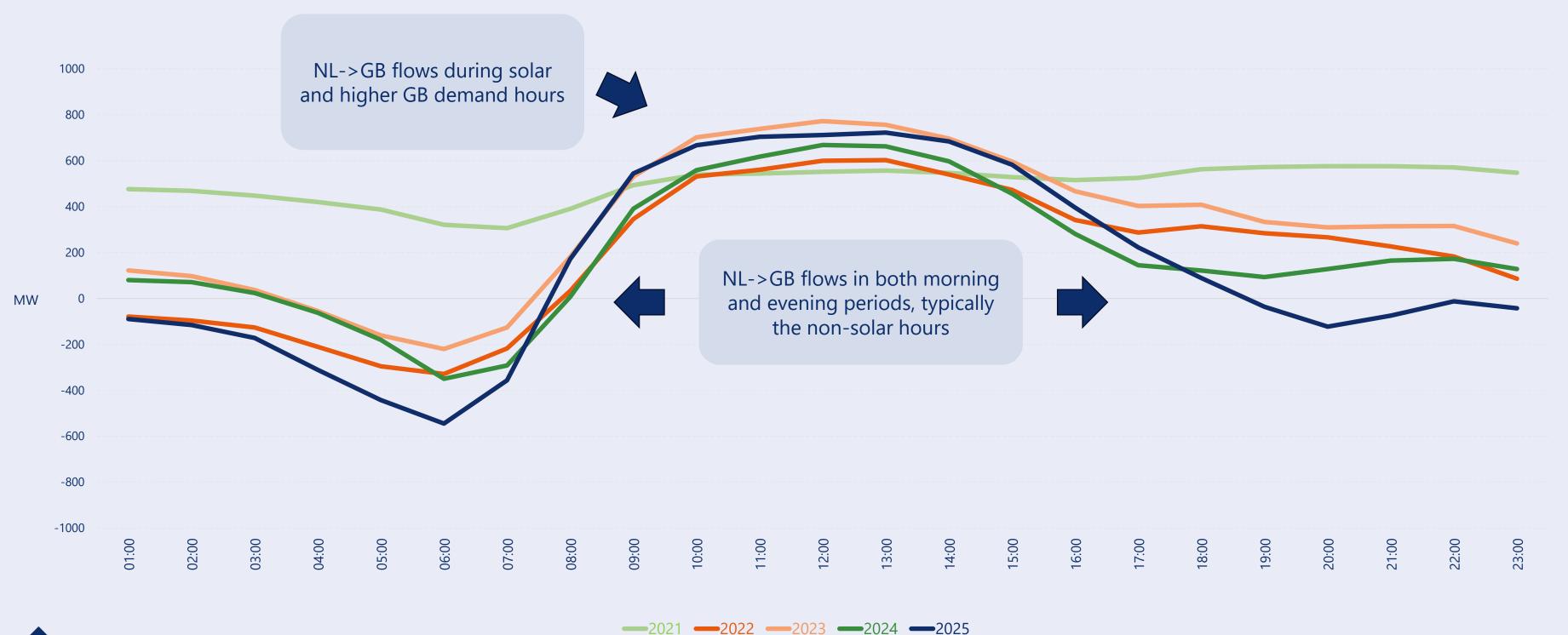
### DAY-AHEAD SPREADS & FLOWS

2025



### **BRITNED FLOWS**

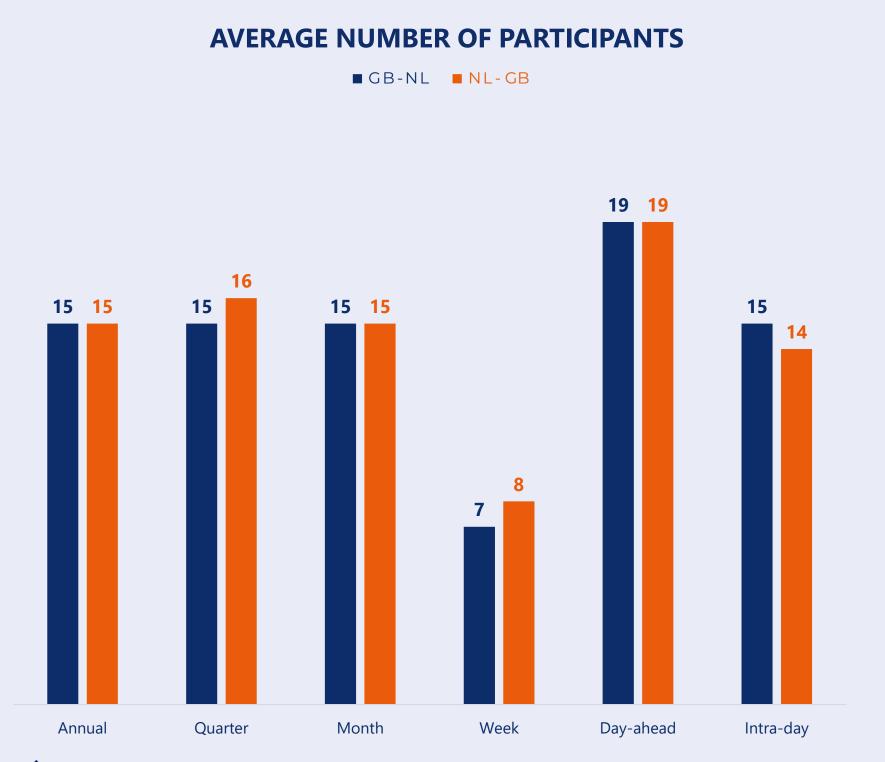
#### **AVERAGE DAILY FLOW PROFILES 2021 - 2025**

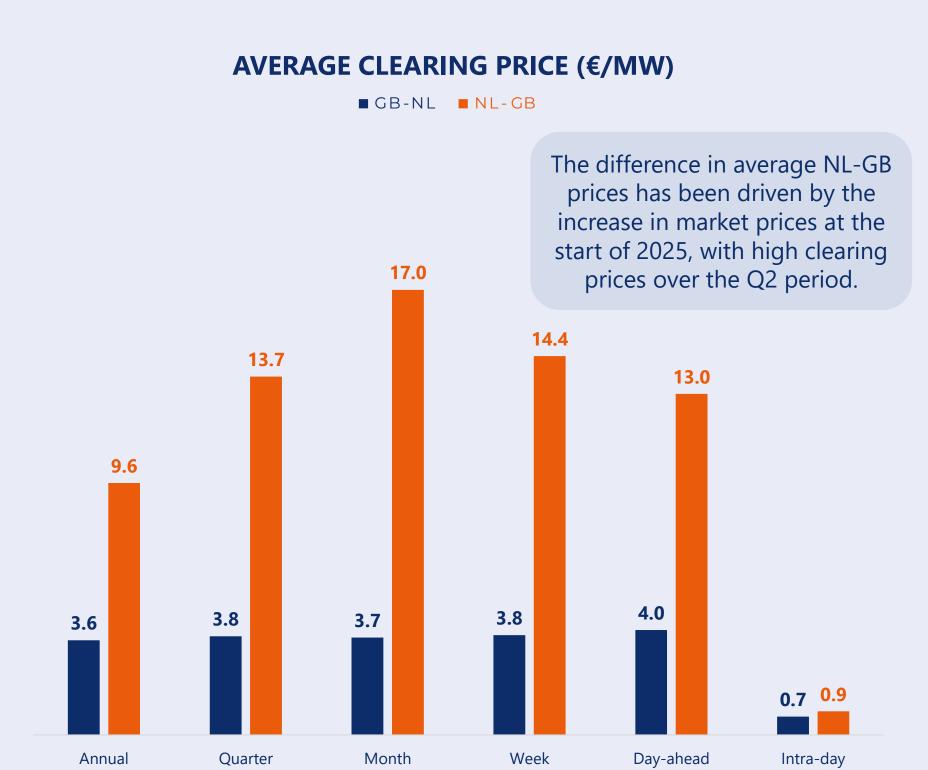




### **AUCTIONS OVERVIEW**

**JANUARY - AUGUST 2025** 

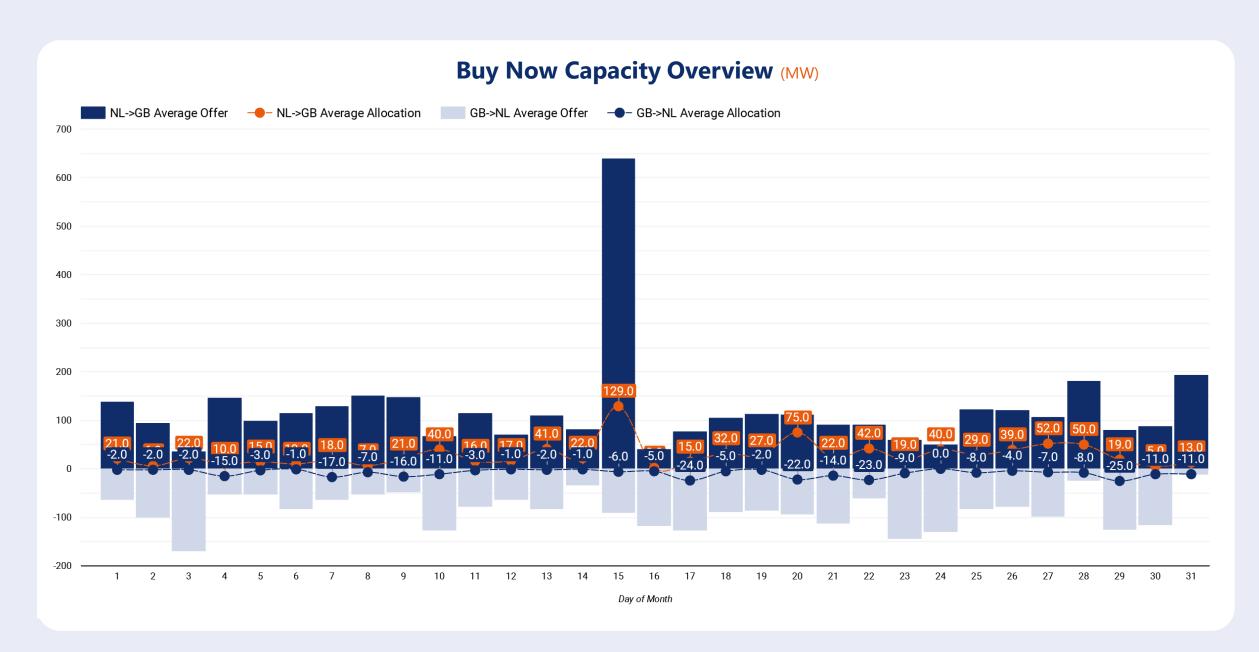






### MONTHLY TRADING REPORT

#### **AUCTION & FLOW PERFORMANCE REPORTING**



#### August 2025 Data

#### **KEY DATA FROM ALL AUCTIONS**

- Designed to provide a comprehensive but concise breakdown of the Long Term,
   Day-Ahead, Intraday and Buy Now auctions, as well as nominations and flows.
- In each edition, we highlight key trends and data that we believe market participants would find useful to analyse the potential value they could achieve through trading via BritNed.
- Register now using the QR code

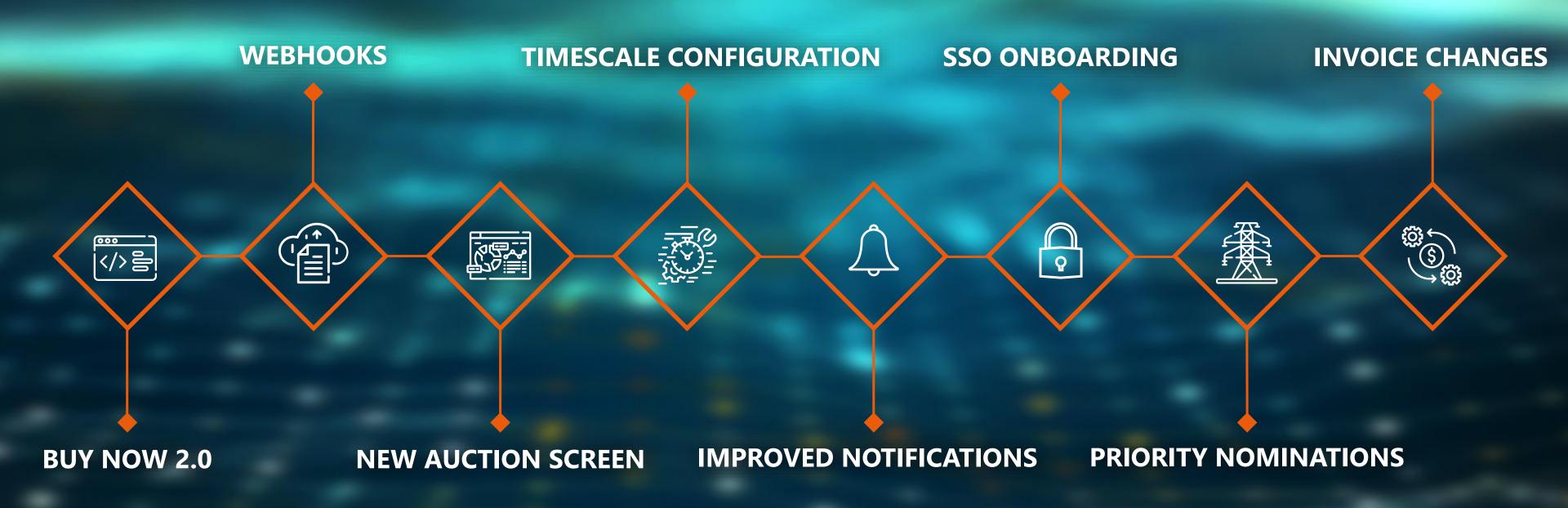






## EMPIRE IMPROVEMENTS

2024 & 2025 UPDATES

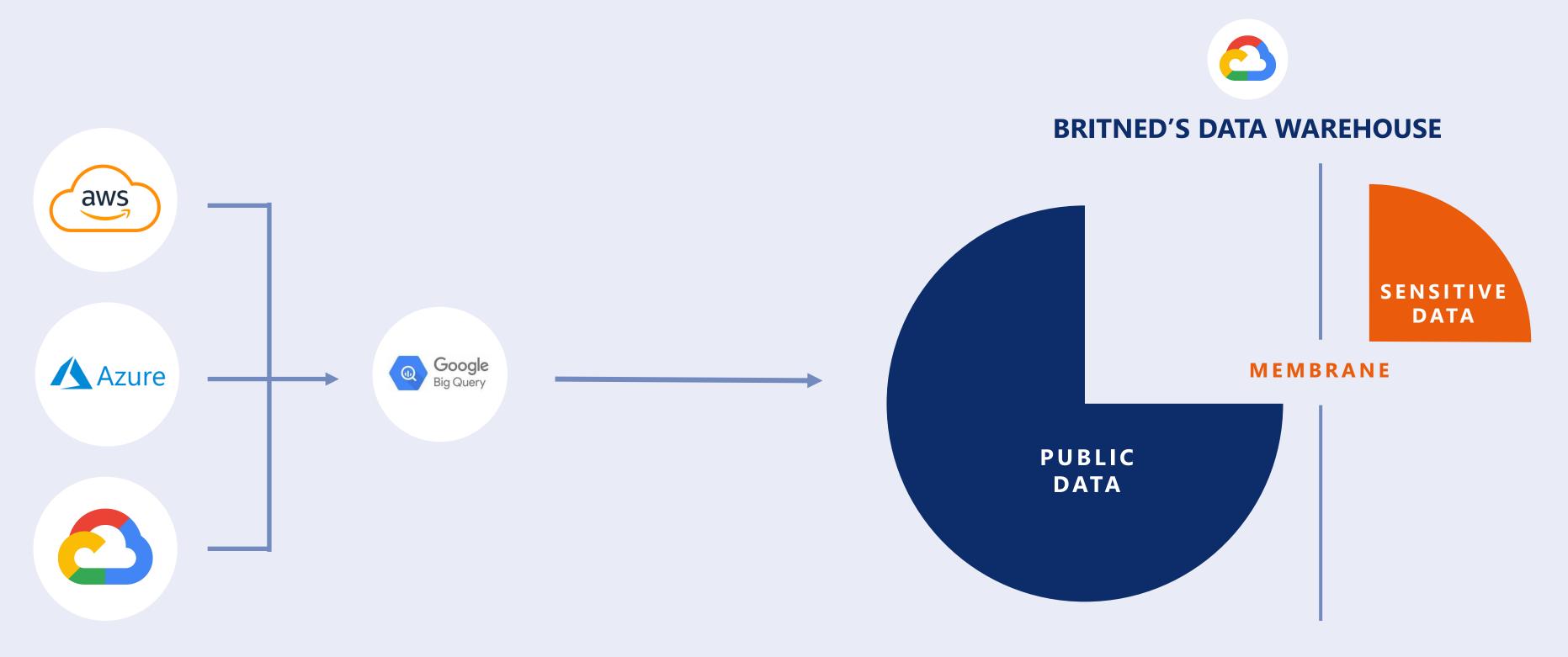






## CONNECT

#### DIRECTLY INTO BRITNED'S DATA WAREHOUSE



**Your Cloud** 

### CONNECT

#### **DIRECTLY INTO BRITNED'S DATA WAREHOUSE**

#### WHAT DATA IS AVAILABLE?

- ✓ Auction clearing prices
- ✓ Auction clearing volumes
- ✓ Anonymised bid curves
- ✓ Aggregated nominations
- ✓ Buy Now auction data

#### **KEY BENEFITS**

- ✓ Save time with simplified access to historic BritNed data\*
- ✓ Access data (including auction results) across all auction products
- ✓ The service will be available free of charge

# CONNECT

66 77

Working with BritNed to setup CONNECT has been an exciting and extremely useful opportunity.

The CONNECT product has opened a plethora of useful data points for us to be able to use, for back testing and as inputs to models that inform trading decisions.

Now, rather than having to scrape and aggregate data ourselves or pay for data through a third party (which is often unreliable or faulty in our experience), we can get the true raw data from the source with CONNECT for the full history of all BritNed auctions.



## POLICY & REGULATION

**2025 UPDATES** 

## EU BIDDING ZONE REVIEW

No changes planned for the Netherlands

#### EU CBAM PAYMENTS

Reporting required from January 2026 but payments delayed until 2027, although charges apply for 2026

Governments working towards Energy Trading Scheme linkage between EU and UK

## UK REVIEW OF EM ARRANGEMENTS

DESNZ have announced their decision to reform the electricity system while retaining a single national wholesale price, which will include NESO balancing reform and improving interconnector flows

#### UK-EU COOPERATION

Possible reintegration of the UK into the EU Internal Electricity

Market





### EU CBAM OVERVIEW

#### **BACKGROUND**

The EU's CBAM regulation is part of the 'Fit for 55' package.

CBAM is a regulatory tool, implemented by the EU, to address carbon leakage and encourage greener global trade practices. It effectively places a carbon price on imported goods based on their embedded greenhouse gas emissions.

#### **CONCERNS**

EU CBAM is applied to electricity imported into the EU. The complex nature of electricity as commodity, and heavily interconnected electricity system, makes it challenging or even counter-productive to it to reduce greenhouse gas emissions.

This would be detrimental to UK-EU cross border electricity trade as it would introduce heavy import tariffs. Cross-border electricity trade would particularly be exposed to the unintended consequences of the EU's CBAM given the interdependencies of markets as well as UK's net zero targets and infrastructure development for renewables.





### EU CBAM IMPLEMENTATION

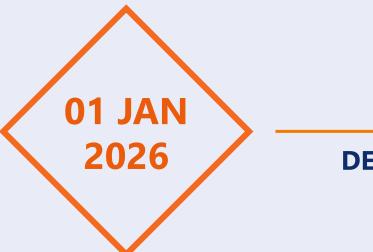


#### PHASE 1

TRANSITIONAL PHASE



- **Focus on Reporting**: Importers of CBAM goods (e.g., iron, steel, aluminium, cement, fertilizers, hydrogen, and electricity) are required to report quarterly on the embedded emissions of their imports.
- No Financial Obligations: While reporting is mandatory, there are no financial adjustments (like buying certificates) during this phase.
- Potential Penalties: Failure to comply with reporting obligations can lead to penalties.
- **First Report Deadline**: The first CBAM report was due on 31<sup>st</sup> January 2024, covering the period from 1<sup>st</sup> October 2023.



#### PHASE 2

**DEFINITIVE PHASE** 

- **Financial Adjustments Begin:** Importers will need to purchase CBAM certificates to account for the carbon emissions embedded in their imported goods.
- Businesses need to get ready well before 2026 to access emissions data and putting systems in place to calculate and track embedded carbon accurately.
- **Process**: To purchase and use CBAM certificates, companies must first register as authorized CBAM declarants



### IMPLEMENTATION: DEFINITIVE

#### **ENDURING CBAM ARRANGEMENTS**

- Financial Adjustments Begin: Importers will need to purchase CBAM certificates to account for the carbon emissions embedded in their imported goods.
- Businesses need to get ready well before 2026 to access emissions data and putting systems in place to calculate and track embedded carbon accurately.
- **Process**: To purchase and use CBAM certificates, companies must first register as authorized CBAM declarants

- **Potential Deferral**: However, in 2025 EC published a **CBAM Simplification Package** which might potentially defer the obligation to purchase CBAM certificates for goods imported in 2026 to February 2027.
- Reporting for Definitive CBAM Arrangements:
- CBAM declaration containing the following:
  - Total quantity of goods imported during the preceding calendar year
  - Total embedded emissions in those goods
  - Emissions to be verified by EU accredited verifier
  - Total number of CBAM certificates to be surrendered
  - The carbon price effectively paid in the country of origin for the embedded emissions
- Declaration to be submitted each year

#### How to get and manage CBAM certificates

- Apply via your National Competent Authority (NCA)
- 2 Receive CBAM account and access to the CBAM Registry
- 3 Purchase certificates through the registry
- 4) Surrender certificates annually based on reported emissions



### **CBAM MITIGATION**

#### **ROUTE 1**

## Shape CBAM Enduring Methodologies to avoid short term financial impact

- Goal is for EC to amend the mechanism of calculating the import tax & recognise the UK ETS price to minimise potential financial impacts through various legislative acts/ amendments prior to 1st January 2026
- Proactive engagement with EU/UK policymakers and wider industry partners to shape detailed technical provisions for the enduring regime and influence the upcoming review of EU CBAM to mitigate impacts until a linkage agreement is achieved.

#### **ROUTE 2**

Ensure political support for UK-EU ETS Linkage to progress as soon as possible and agree interim mutual CBAM exceptions

- Now that ETS linkage has been included in the "reset" discussions between the EU and UK, the goal is to have a linkage agreement as soon as practicable and in the interim, to get a CBAM exemption while linkage is being negotiated to avoid impacts as of 1 January 2026;
- Linkage negotiations may take at least 12-18 months. Continued engagement with EU/UK policymakers & stakeholders to support linkage discussions; advocate for a flexible a pragmatic approach in negotiations & for the need for urgent clarity on exemption possibilities to avoid costs.
- It is widely recognised that the best way to mitigate the risks from CBAM would be to align the EU and UK ETS (Emissions Trading Scheme).
- After considerable amount of advocacy, the ETS linkage has been agreed following the UK-EU Summit on 19th May.
- The following routes are being considered in how the risks from CBAM are going to be mitigated until the ETS Linkage is finalised and implemented between UK and EU
- Joint EU Associations' letter to keep the attention high on ETS linkage and CBAM exemption sent to EC and Council on 10th July
- The letter reiterates that time is of the essence to ensure industry and consumers do not bear unnecessary costs



### IMPLEMENTATION TIMELINE

#### **Timeline**



Aug 23

Oct 23

Jan 24

Q4/24

Q1/25

Q2/25

Q3/25

Q4/25

Jan 26

Transitional phase: data deporting submissions

Establishing CBAM exemptions and/or Third Country Agreements EC work on developing methodologies & requirements for the enduring regime



17 August 23: Transitional period Implementing Acts published



1 Oct 23: Transitional period start



31 Jan 24: First CBAM report due



By Q4/2024: Implementing IA: technical arrangements for the CBAM Registry; Implementing Act on conditions for authorisation of CBAM declarants



Q1/2025: IA: conditions for CBAM application to goods brought to EEZ



Q2/2025: DA: conditions for sale and repurchase of CBAM certificates



Q3/2025:

IA: calculation of emissions and CBAM declarations; IA: accreditation of verifiers and verification principles;

of verifiers and verification principles; DA: conditions for accreditation and verifiers



Q4/2025:
IA: carbon price and price of certificates;
IA: adjustment for free allocation;
IA: Customs communication and information

on imports



01 Jan 26: Enduring regime start: financial Implementation





# AGENDA OPERATIONAL UPDATE

Asset Overview 2

**Current Asset Performance** 

3

The Cable Repair Project

4

Future Plans and Investment

5

Questions



### THE ROUTE OF THE INTERCONNECTOR

#### AN OVERVIEW OF BRITNED'S ASSETS



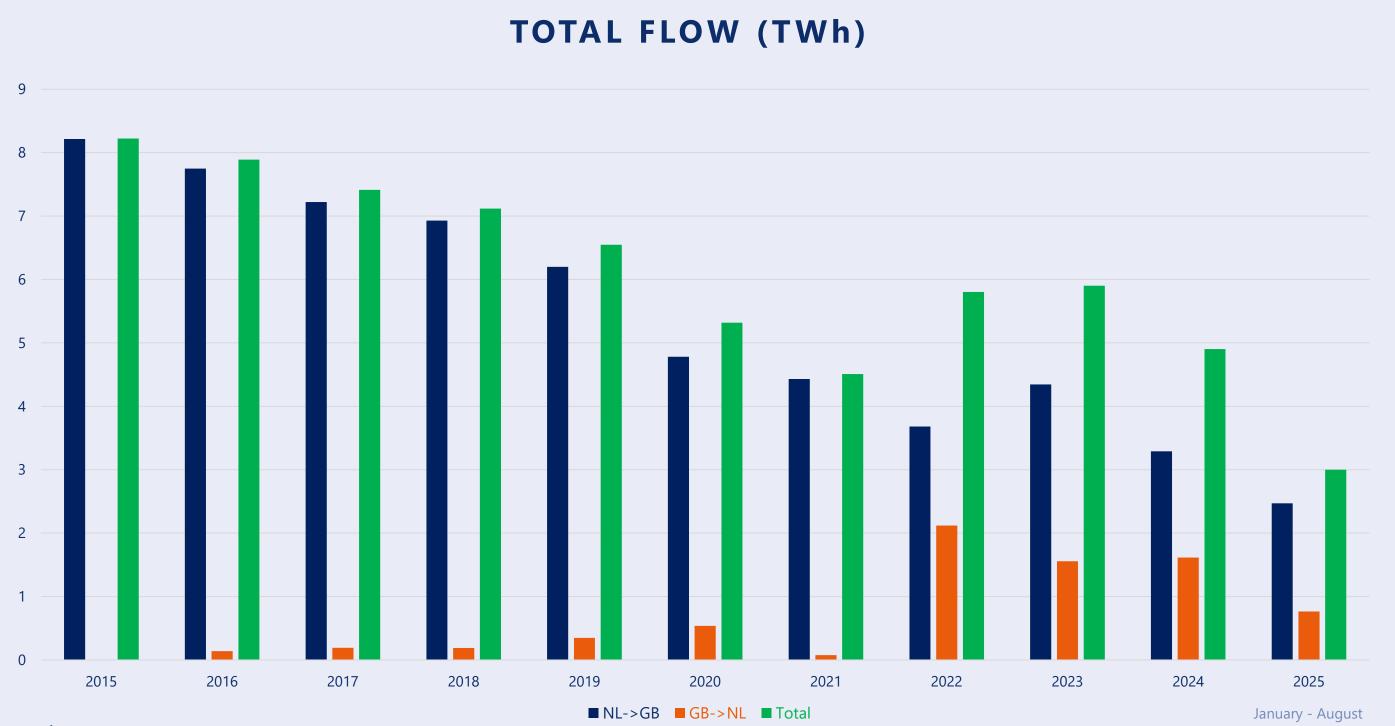


## THE CONVERTER STATIONS



## **KEY FIGURES**

#### AN OVERVIEW OF BRITNED'S ASSETS



#### **PERFORMANCE**







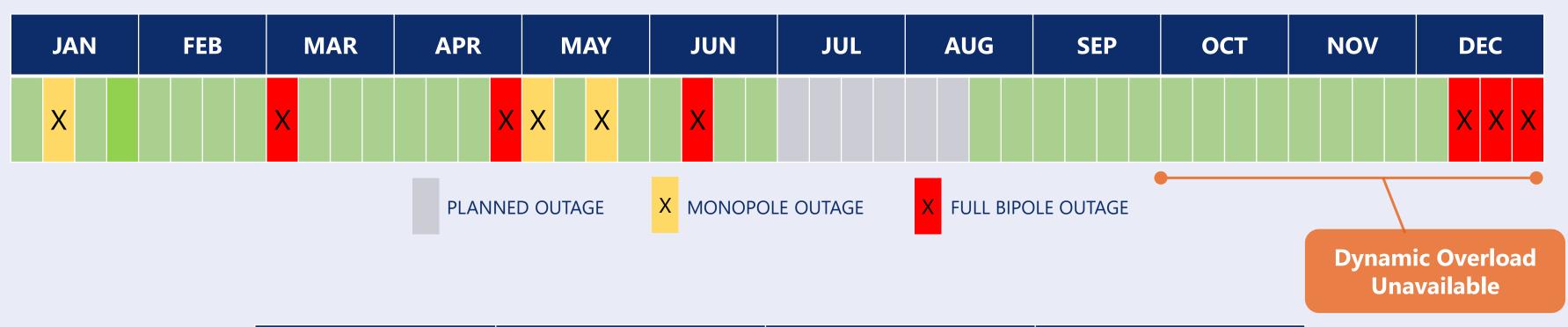


**67** TWh Power exchanged 2011 - 2025



### HISTORICAL PERFORMANCE

#### 2024 AVAILABILITY & RELIABILITY



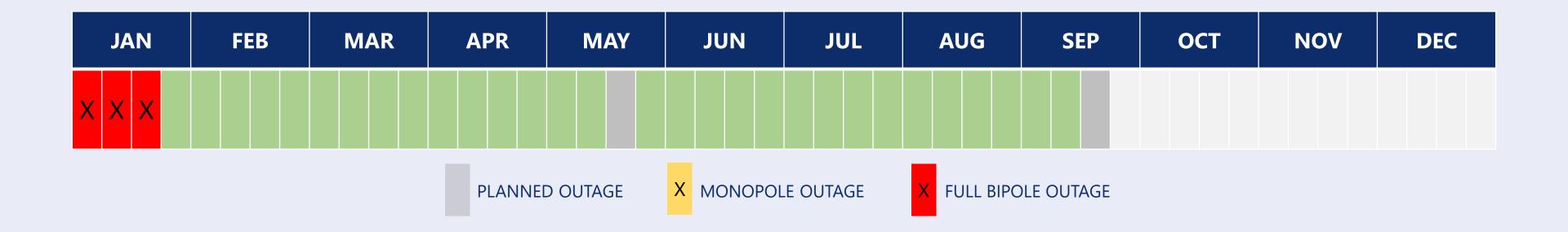
2024 TARGET	<b>AVAILABILITY</b> w/o Dynamic Overload	<b>AVAILABILITY</b> with Dynamic Overload	RELIABILITY (Unplanned/forced planned outages)
97.5%	84.76%	84.77%	8

#### **BENCHMARKING**



## CURRENT PERFORMANCE

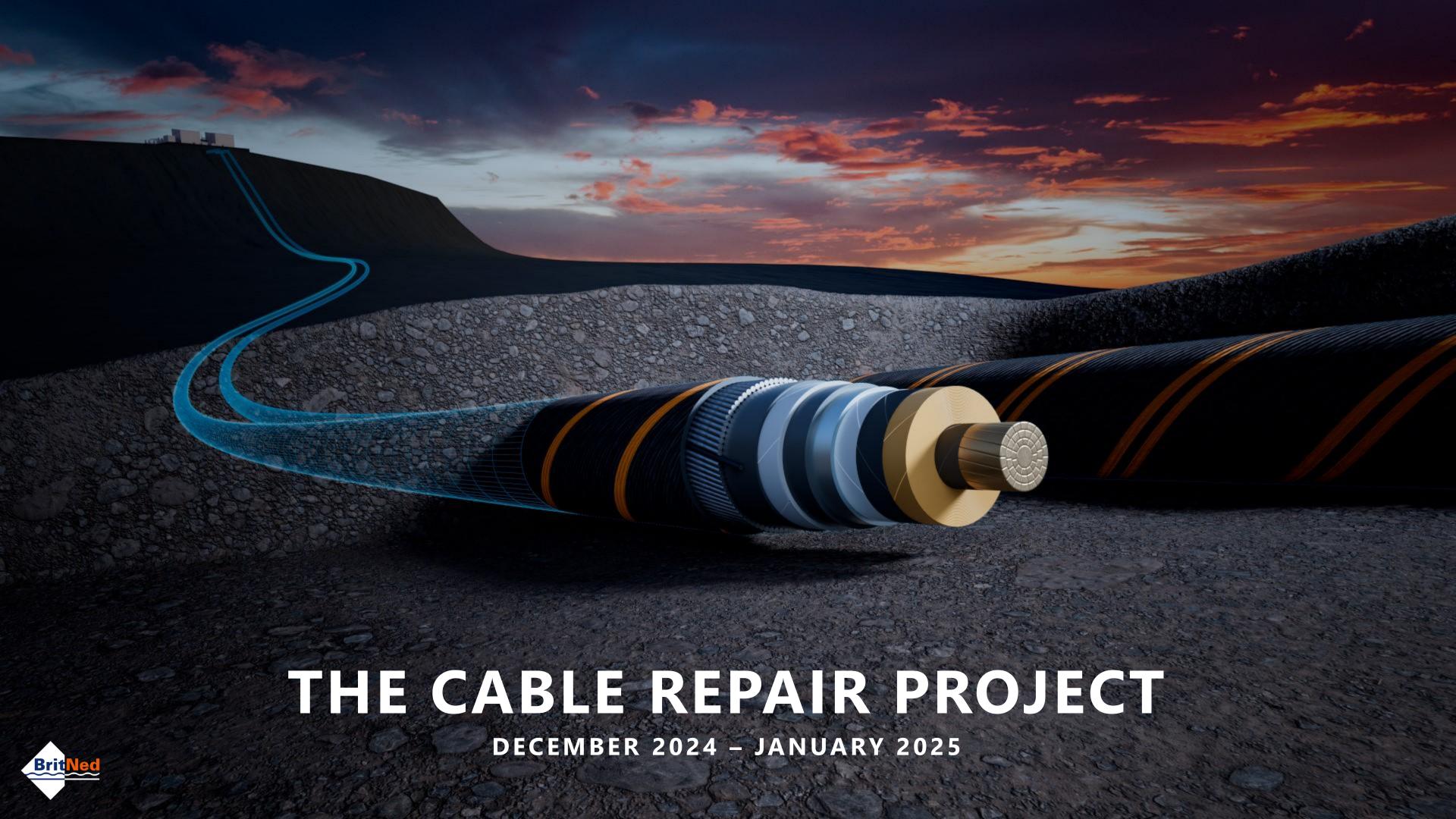
#### 2025 AVAILABILITY & RELIABILITY



2025 TARGET	<b>AVAILABILITY</b> w/o Dynamic Overload	<b>AVAILABILITY</b> with Dynamic Overload	RELIABILITY (Unplanned/forced planned outages)
94%	86.63%	89.03%	1 (January)







### THE CABLE REPAIR PROJECT

TIMELINE - MAJOR MILESTONES









6 DECEMBER 2024

THE INITIAL TRIP
IS REPORTED



FAULT LOCATION CONFIRMED



ONBOARDING OF CONTRACTORS **12 DECEMBER 2024** 

**SOLUTION DESIGN** & DEVELOPMENT









**27 JANUARY 2025** 

RETURN TO SERVICE



SECOND TEST: POWER FLOW



INITIAL TEST: VOLTAGE



REPAIR WORKS COMMENCE



## THE LOCATION OF THE FAULT

#### **MAASVLAKTE**

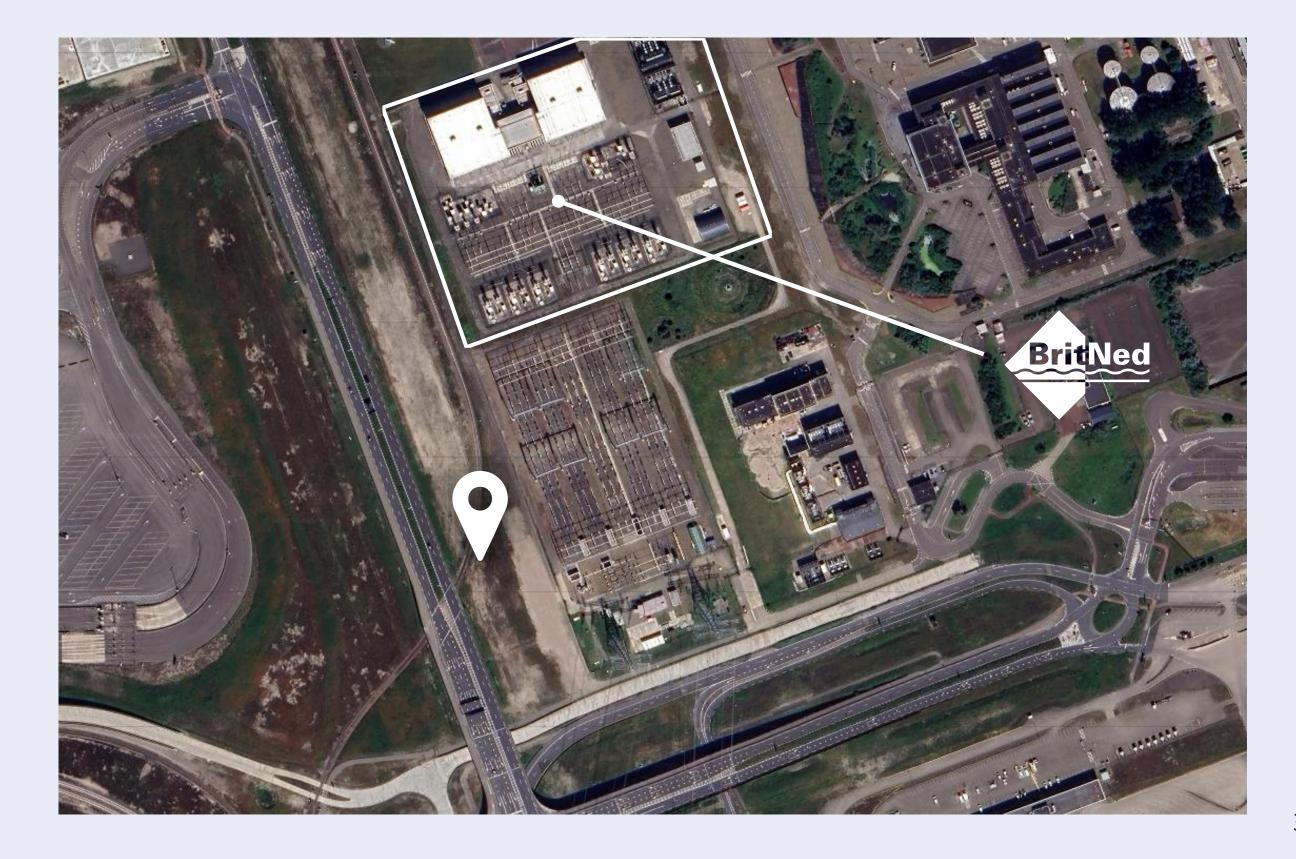
Our Cable Resilience Plan enabled the team to identify the cable fault quickly.

On 10 December, the location of the fault was confirmed.

High Voltage tests identified a fault with Pole 1,  $\approx$  300m from the Maasvlakte converter station.

We engaged several partners, including:

- Elektro Koopman
- NKT
- BT Geo
- Van Vulpen
- KLIC



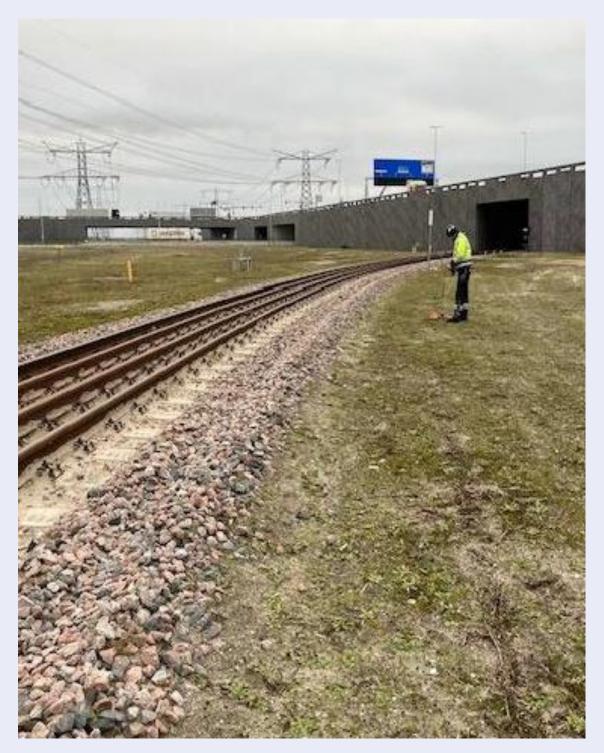


## THE LOCATION OF THE FAULT

#### **COMPLEXITIES AND CHALLENGES**

#### **PROJECT CHALLENGES:**

- Engineering the fault was in a congested area with 12 infrastructures in a 4m2 area, including a railway track and other high-voltage cables
- **Stakeholders** due to the number of infrastructures, there were many stakeholders in the area
- Permitting the project required new permitting and working documents to be drafted and approved
- People The Christmas holidays would pose difficulties with contractor availability
- Excavation could only be done with ProRail approved contractors due to the proximity to railway







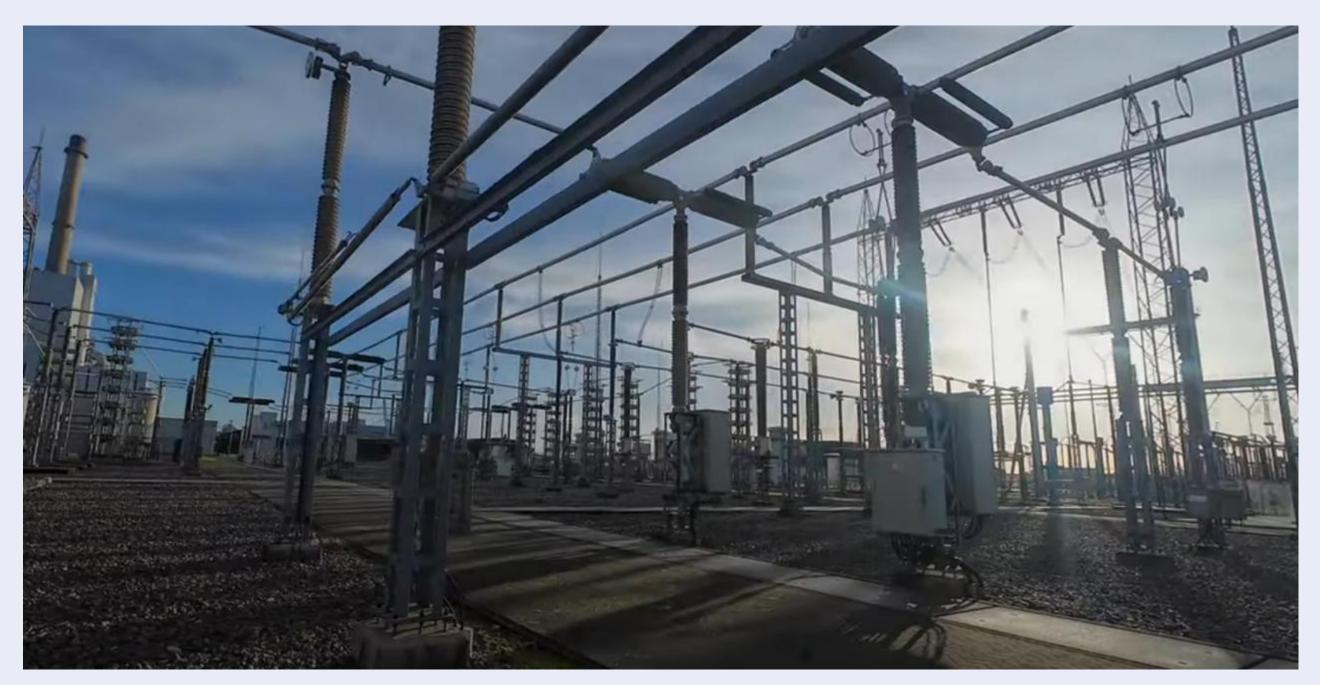
## THE REPAIR PROJECT





## EARLY RETURN TO SERVICE

27 JANUARY 2025 - 4 DAYS EARLY









PROJECT OVERVIEW **STATISTICS** 100 DAYS REPAIR PROJECT

**ENTIRE PROJECT DURATION** 

51 DAYS

6 December – 27 January

**REPAIR PROJECT DURATION** 

2 January – 27 January

**TEAM SIZE** 

including partners

DAYS

**EARLY RETURN TO SERVICE** 

**ACCIDENTS** 

**NO ACCIDENTS OR SAFETY INCIDENTS** 



## NEXT STEPS

THE CABLE REPAIR PROJECT



## REVIEW OF THE CABLE RESILIENCE PLAN

(including land cable repair procedure)



ORGANISE LESSONS LEARNED SESSION WITH STAKEHOLDERS



## RISK ASSESSMENT AT BOTH SITES

(identifying key stakeholders for land cable route)



## CONTINUE TO PREPARE FOR PHASE 2

(recover faulty part near railway track & assess the status of Pole 2)



## ASSET MANAGEMENT

TACKLE EMERGING CHALLENGES TO MAINTAIN OPERATIONAL EXCELLENCE

## TECHNOLOGY & SYSTEMS

System Strategy

HMI Replacement (planned for Sept 26)

Review the remaining Asset Management Systems

Review new Condition Monitoring equipment

### **ASSETS**

Complete Critical Asset Strategies and Resilience Plans

Continue Asset Health and Maintenance Project

Take AM maturity and gap assessment

### **SAFETY**

Complete the Safety Management System and review Safety Rules

Roll out Behavioural Safety programme



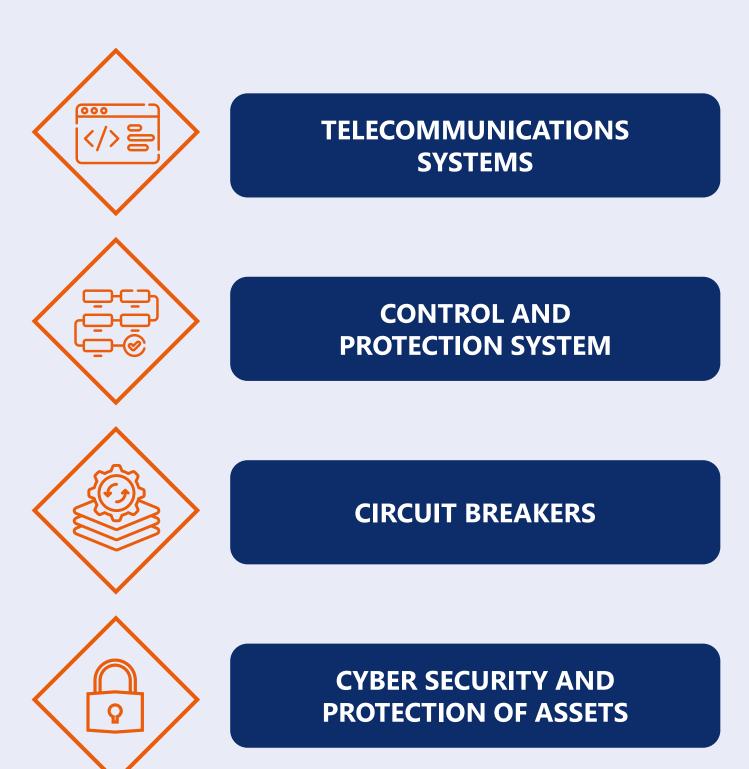


Deliver 'World Class' performance for our customers and stakeholders, whilst enabling the opportunities of the 'Energy Transition'.



## FUTURE ASSET PLANS & INVESTMENT

PROJECTS TO FURTHER INCREASE OUR AVAILABILITY & RELIABILITY









## AGENDA

**EMPIRE UPDATE** 

1

**Empire Improvements** 

2

2025 Challenges 3

Buy Now 2.0 Feedback

4

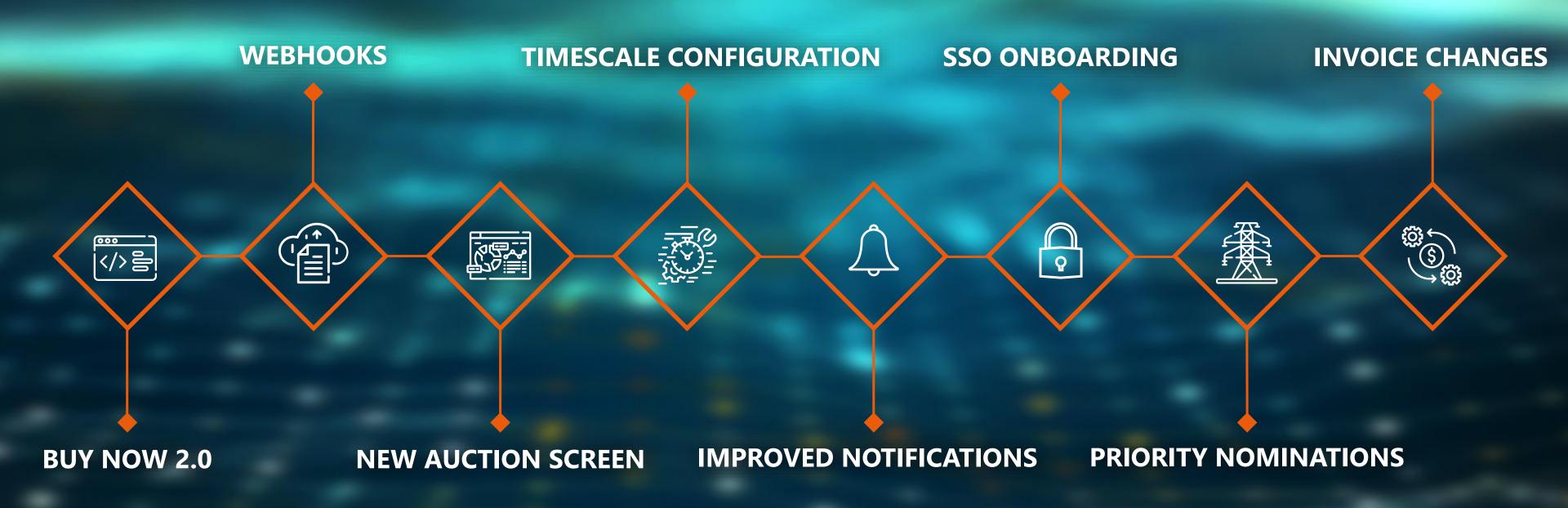
Webhooks Recap 5

**Empire Explained Video Series** 



## EMPIRE IMPROVEMENTS

2024 & 2025 UPDATES





## CHALLENGES

### **EMPIRE UNAVAILABILITY**

### **EMPIRE DATABASE FAILURE (AWS)**

- 25/07/2025
- Empire intermittently unavailable for 31 minutes
- Intraday Auction 2 cancelled

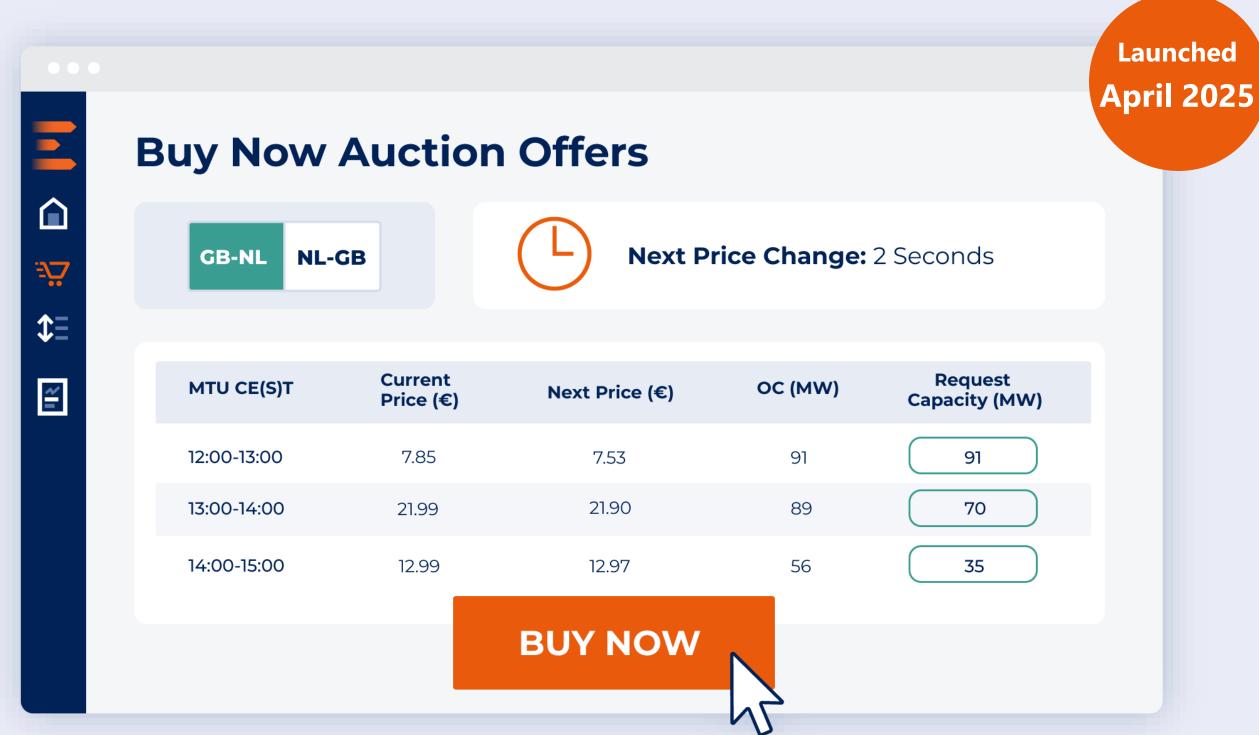
### **FAILED EMPIRE 7.0 DEPLOYMENT**

- **1**4/08/2025
- Empire GUI and API unavailable between 17:38 21:00
- Intraday Auction 1 for 15/08/2025 cancelled
- All capacity offered in Buy Now auctions



## **BUY NOW 2.0**

### REDESIGNING & IMPROVING THE UNIQUE AUCTION



### **INSTANTLY SECURE CAPACITY**

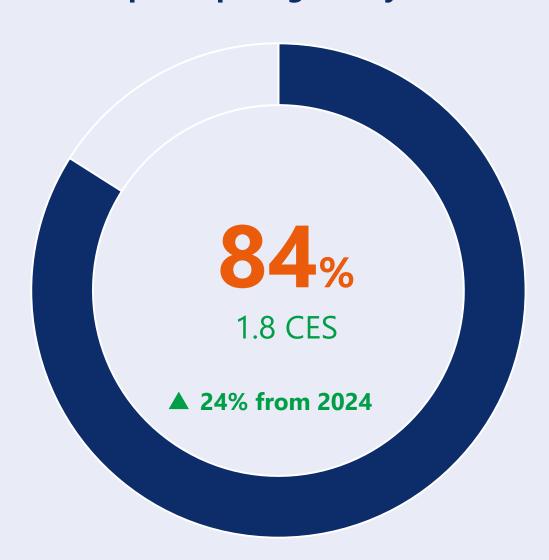
- ✓ Purchase any capacity amount (up to the offered capacity)
- ✓ Acquire capacity before, during, and after the regular Intraday auctions
- ✓ Secure capacity 30 minutes before the Intraday auction and up to just two minutes before the nomination gate closure
- ✓ Purchase capacity for multiple MTUs simultaneously



## BUY NOW 2.0

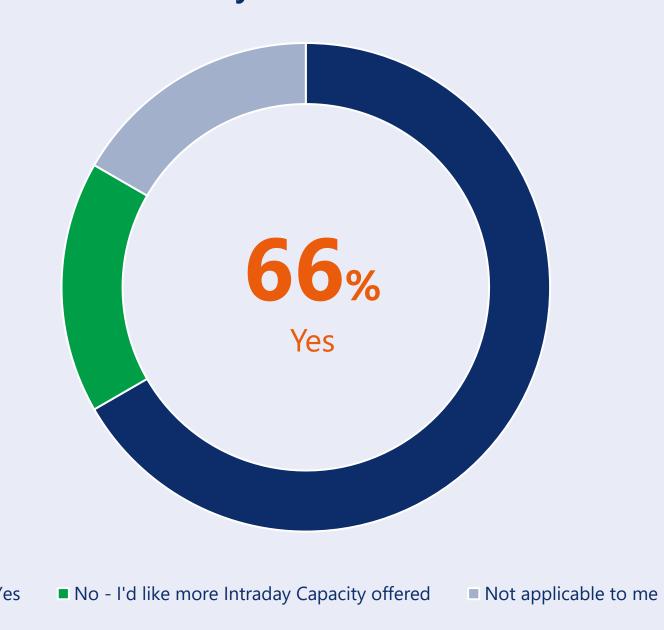
### **MID-YEAR SURVEY RESULTS**

Following the release of Buy Now 2.0, how would you describe participating in Buy Now auctions?



66% of participants responded Very Easy or Easy

## Do you think BritNed offers enough capacity in Buy Now auctions?





## WEBHOOKS

### **PUSH NOTIFICATIONS FROM EMPIRE**



### **REAL-TIME NOTIFICATIONS**

Get real-time notifications and respond immediately to key events, no polling, no delays



### **SEAMLESS AUTOMATION**

Trigger workflows or actions automatically, reducing manual effort and improving efficiency



### **LOWER API USAGE**

Reduce polling and unnecessary API calls, avoiding API rate limit and saving system resources

Auctions	Buy now offers	Finance
Long Term auction specification updated	Buy now offer published	Invoice sent
Day Ahead auction specification updated	Secondary Market	Invoice marked as paid
Intraday auction specification changed	Transfer request received for LT	Outages
Auction status updated	Transfer request received for DA	Unplanned outage created
Auction cancelled	Transfer request received for ID	Unplanned outage updated
Long Term auction allocated	Nomination Window Overrides	Unplanned outage cancelled
Day Ahead auction allocated	Nomination window override created	Unplanned outage ended
Intraday auction allocated	Nomination window override updated	Curtailment
		Curtailment executed



# EMPIRE EXPLAINED

**VIDEO SERIES** 

PHASE ONE

1

**DASHBOARD** 



**REPORTS** 



**BUY NOW** 



**NOMINATIONS** 

PHASE TWO



**AUCTIONS** 



ORGANISATION SETUP



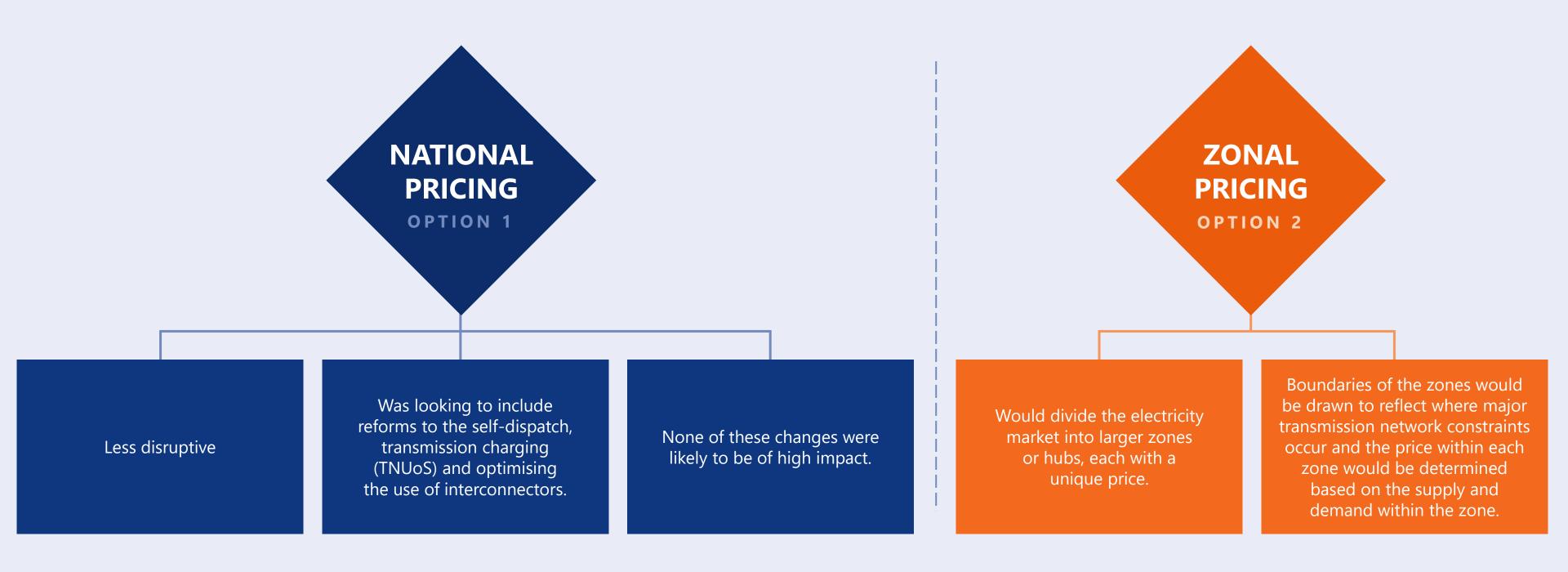
INVOICING & SETTLEMENTS





## **OVERVIEW**

### REMA - THE REVIEW OF THE ELECTRICITY MARKET ARRANGEMENTS



To facilitate GB's aim to reach Clean Power by 2030, networks must be sufficient to prevent large scale curtailment of zero carbon resources with economic options available to NESO should constraints need to be managed. This includes any transition periods where the build out of zero carbon generation temporarily outstrips network build.



## THE DECISION

### A REFORMED NATIONAL PRICING DELIVERY PLAN



DESNZ have announced their decision to reform the electricity system while retaining a single national wholesale price.

The government will publish a Reformed National Pricing Delivery Plan later this year, setting out the next steps on design and delivery.

The initial elements of the package include:

- utilising Strategic Spatial Energy
- reforming transmission charging & connection charging
- NESO balancing reform
- constraint management through the Constraints Collaboration Project
- improving interconnector flows





## KEY PRIORITIES

### THE REFORMED NATIONAL PRICING PACKAGE



### NESO BALANCING REFORM

Cautious support for principals behind change (or more granular signals), but will depend on the detail of the proposals



## CONSTRAINTS COLLABORATION PROJECT

Support of NESO's focus on alternative ways to manage system constraints outside the Balancing Mechanisms.

Have previously indicated that intraday trading on interconnectors provides a blueprint for potential constraint management tools in UK.



## IMPROVING INTERCONNECTOR FLOWS

It is encouraging that the Government has recognised the issues around this topic, and this aligns with our engagement with NESO and TenneT

It will be useful to explore the full benefits of the IEM by all parties, including the use of balancing products by NESO in the exploration of the UK's participation in the IEM.





## REINTEGRATION IN TO THE IEM

### **UK-EU CLOSER COOPERATION**



- The UK is no longer part of the Internal Energy Market (IEM) following its departure from the EU.
- While the UK and EU remain interconnected for energy, trading arrangements are now governed by the Trade and Cooperation Agreement (TCA) rather than EU market mechanisms.
- However, British energy markets could be re-integrated into the IEM under the UK-EU agreement reached on 19<sup>th</sup> May 2025.

### THE NEW UK – EC 'COMMON UNDERSTANDING'

"The UK and EC share the view that close cooperation on electricity is in the interest of both the European Union and the United Kingdom".

"...explore in detail the necessary parameters for the United Kingdom's possible participation in the European Union's internal electricity market, including participation in the European Union's trading platforms in all timeframes".

### **A NEW AGREEMENT**

"...should define the relationship between the United Kingdom and European Union rules on the electricity market, as well as on State aid, the promotion of renewables and the protection of the environment, in so far as they relate to the electricity sector".

Until then, current electricity trading arrangements will continue to apply.



## REINTEGRATION IN TO THE IEM

**UK-EU CLOSER COOPERATION** 

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The agreement at the Summit reflects that call (reestablishment of price coupling). This is great news for energy consumers in the EU and the UK.

UK participation in the EU electricity market will make it easier to trade electricity and reduce electricity prices in both the UK and EU. It'll help with the top political priority of reducing energy costs for European industry.

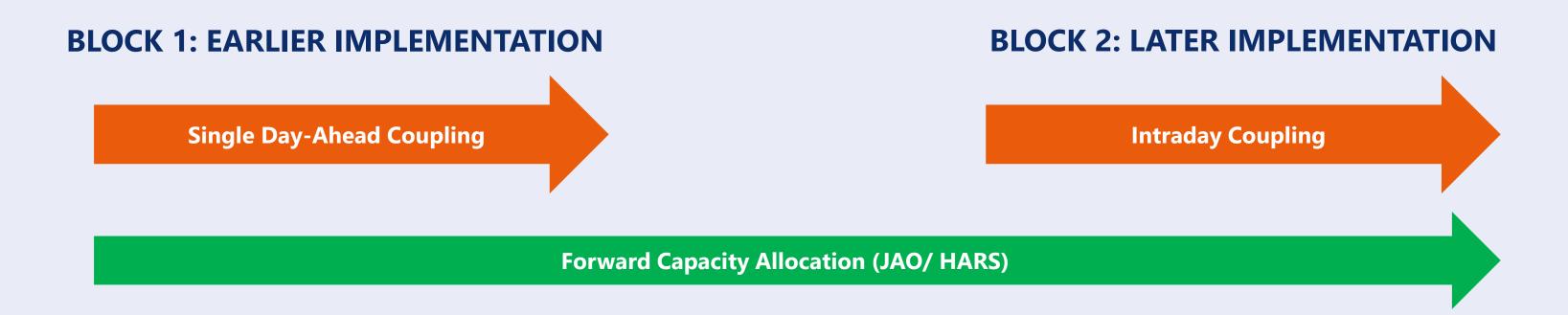


WindEurope CEO Giles Dickson



## OPTIONS FOR IEM PARTICIPATION

### **UK-EU CLOSER COOPERATION**



#### **SDAC PRIORITISED IN BLOCK 1:**

- Most investable proposition
- Social welfare and efficiency gains above explicit and MRLVC

### FCA COULD OCCUR EARLY / IN PARALLEL TO SDAC:

- Relatively easy implementation
- Coordination of platforms (SDAC, SAP)
- However, there are certain risks with FCA:
  - Smaller priority that SDAC due to low market efficiency gains
  - Curtailment compensation at market spread
  - Empire platform may no longer be used operationally

## ACCESS TO BALANCING PLATFORM AND INTRADAY COUPLING (SIDC & XBID) IN BLOCK 2:

- Significantly more complex markets and lower welfare gains suggest these platforms are likely to follow SDAC
- XBID provides no additional revenue to interconnectors despite using our capacity so is unattractive

Before taking away explicit, Intraday, balancing tools and mechanisms may need to developed



## WHAT WOULD PARTICIPATION MEAN?

**UK-EU CLOSER COOPERATION** 



### **CONSIDERATIONS**

- New Capacity Calculation Methodology
- Empire cannot be used operationally
- Re-register with JAO
- Long-term auctions within JAO



### **BENEFITS**

- Easier to trade electricity
- Lower wholesale prices
- Reduced consumer bills





