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Datum 12 August 2019
Uw referentie
Onze referentie BN 19-020
Bijlage(n) 5
Onderwerp 2019 Access Rules IEM For Approval

Geachte heer Henk Don,

Please find alongside this cover letter BritNed Development Limited's 2019 Access Rules IEM for approval.

For your information, the following documents are submitted:

- Access Rules 2019 IEM
- Access Rules Response Summary Table
- EDF Trading consultation response
- Gazprom consultation response
- NGESO Consultation response.

In addition to the points raised specifically related to the IEM Access Rules consultation, Gazprom and EDFT commented on the application of the reserve price and firmness principle.

Reserve Price

In relation to the reserve price for long-term auctions, Gazprom and EDFT both believe this should be removed as the reserve price prevents optimal allocation of capacity. As this would take time to implement the required changes, they also stated a preference for a short-term solution of publishing the reserve price in advance of the auctions until such time that the reserve price is removed.

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EDFT also raised a specific issue related to the reserve price for long-term auctions, in that the remuneration of the Long-Term Transmission Rights should be compensated at the clearing price and/or reserve price.

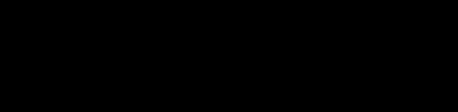
Firmness Principle

In relation to the firmness principle, Gazprom commented that BritNed should apply the same firmness principle to its products as IFA and NEMO Link. i.e. become fully firm (financial and physical) after the Day-Ahead Firmness Deadline.

BritNed does not believe these comments on the reserve price and firmness principle have an impact on the Access Rules. However, BritNed would like to discuss these topics with you further outside of the Access Rules process.

Met vriendelijke groeten,

BRITNED DEVELOPMENT LIMITED



Regulatory Manager