

## **NMa Consultation: 104195/2 Strategic priorities E&G Wholesale Markets**

### **BritNed Response**

BritNed Development Limited (BritNed) welcomes this opportunity to respond to the Netherlands Competition Authority's (NMa) consultation on the strategic priorities E&G wholesale markets. This response focuses on the implications of NMa's priorities for BritNed

We recognise the consultation document is important to gather the views of all stakeholders within the electricity market and BritNed, as part of Dutch market, is pleased to see NMa publish its consultation in an effective manner.

The consultation document is very timely as now is the moment to consider all the implications of market integration. BritNed considers the market coupling of North West Europe a key step in the integration of the European energy market and we are keen to actively cooperate in its implementation.

***Question 1: to what extent do you agree with the above priorities for the wholesale markets for electricity? and***

***Question 2: what other priorities do you think should be included?***

BritNed agrees with the priorities set out in the consultation document put forward by the NMa. BritNed believes that they highlight a consistent list of key issues and believe that the NMa has effectively covered all the major areas. BritNed is aware that to achieve an integrated European Energy Market change is required as well as the introduction of new policies and regimes and we ask that any such change or new development is treated on a fair and reasonable basis to maintain a level playing field for all, now and in the future.

***Question 3: what do you think the order of the priorities should be?***

BritNed believes that all of the priorities are important but that since some of the issues have fixed timescales, the best course of action would be to order the priorities chronologically.

***Question 4: are the proposed actions adequately concrete?***

BritNed acknowledges that all the priorities are a work in progress and, as such, no conclusions have yet been reached on any of them. With this in mind, BritNed believes that the NMa has proposed actions that are as concrete as can be expected and that over the next 18 months, these actions will lead to clear, and coherent conclusions.

***Question 5: what role do you expect the NMa to take in the proposed actions and what role do you see for the market parties?***

BritNed would expect the NMa, as well as market parties and TSOs, to have a good understanding of the proposed actions to the priorities outlined in the consultation document. What BritNed has seen to date has been very encouraging as we feel the NMa has established a good level of understanding and BritNed is reassured that the NMa takes the issues set out in the consultation very seriously.

The NMa, along with market parties and TSOs, must continue evolving this understanding as the priorities that the NMa has set out will soon be drafted and will need National Regulatory Authority approval. As a result, BritNed would expect the NMa to have a firm understanding from the Netherlands' perspective, and from the perspective of other Member States. BritNed would expect this understanding to be used in coordinating with market parties and all TSOs.