Respondent	Section	Market Party response to consolation	BritNed response
Energi Danmark	the transfer of daily and intraday capacity rights between counterparts	There’s nothing in there about the price this is exchanged at. Given the short lead time between when this transfer would occur and the capacity needs to be used it would make sense to also have in there what price it’s transfer between participants and then adjust their credit/debit to BritNed accordingly. Happy to discuss if this doesn’t make sense.	BritNed’s new allocation platform will allow to enter a price for the Transfer and will record this as part of the transaction between two market parties on the platform. BritNed does not settle the amount of this OTC trade given it is not an involved party in this trade and therefore cannot take any financial liability now for such a transaction. BritNed is however willing to explore different Transfer processes possibilities that could also cover financial settlement options between customers in the future. In this case BritNed would require discussing different collateral and settlement options before such implementation.
Electoroute	D5.8	We at ElectroRoute are not in support of the proposed modification **D5.8 Reserve Price**. The proposal is on the re-introduction of the stepped reserve price instead of one single reserve price for the offered capacity. We conclude that a single, known reserve price should be implemented to maintain a fair and efficient market. The stepped reserve price distorts market pricing, particularly when the reserve price is unknown. We expect this change to have an adverse effect on the market by disincentivising participants to bid on the long-term auctions.	BritNed’s regulatory framework does not include a financial floor as the case for other Interconnectors, therefore a Reserve Price is still required for BritNed going forward. We believe that the re-introduction of a stepped Reserve Price will help to allow more capacity clearing in auctions as it will not only set one min. price level needed to be reached with a bid but multiple ones. Hence lower price levels can be cleared while others remain non cleared due to the Reserve Price level. With the current flat Reserve Price approach, no capacity would clear in such auctions.

EDF	D Auctions Rules	**We introduced a Buy-Now Auction, for capacity that becomes available on short notice, for example if the Reduction Period is shortened or additional capacity becomes available through optimisation processes**. We understand it could implemented after either DA or ID auctions. 1.) What kind of lead time (of the auction timing and capacity available) will you provide to market participant before the auction is run ? 2.) How this will interfere exactly with the intraday auctions, in term of timings between the current 4 ID auctions, and in term of available capacity ? 3.) If this buy-now capacity is not bought/nominated on this specific auction, will it be given back to the next ID auctions ? 4.) Will this buy-now auction use the principle of UIoSI or UIoLI ?	1.) BritNed will always give as much lead-time as possible before offering capacity. However, given this is a short-term product that aims to allow more capacity being offered to the market, lead-times will depend on: - exact outage times being known. - as well as when additional capacities become available due to optimisation process in asset handling. Automated notifications will however be raised on the new Platform as well as by email to all participants once such offers will be published. 2.) Intraday Buy Now Offers will be made available from one hour before the respective Intraday Auctions as well as post Intraday Auctions for each of the respective auction allocation blocks depending on additional capacity generated out of asset handling optimisation processes. 3.) No, the capacity that is offered through Buy Now will not be offered through the next Intraday Auctions as there will be no fitting Allocation Periods anymore. This will also mean that none of the regular Intraday capacities will be withhold from the usual auctions. 4.) As Buy Now Offers will be allocated through the Day Ahead and Intraday timescale UIoLI will be applied in line with the usual Day Ahead and Intraday capacity process.

		We introduced unit for one MTU of the Product Period Can you please clarify this one ?	MTU was introduced as the platform does offer the possibility for the allocation of 30min and 15 min products. This option will not be used without further market consultations and alignment with TSOs and was primarily built to be able to accommodate future market changes.
		We introduced the possibility of Pre-Bids, participant have the option to place Pre-Bids for selected individual Auctions. We understand that the Pre-bid is different from the Default bid. How long before the auction opens a market participant can enter a Pre-bid?	A pre-bid can be entered as soon as an Auction becomes visible in the auction schedule and can hence be selected through the platform in the pre-bidding screens. This also marks the difference to default bids which will be applied to all upcoming auctions with matching parameters while pre-bids will only be applied to the previously selected auction.
		We re-introduced the stepped reserve price instead of one single reserve price for the offered capacity. We are strongly against any type of reserve price for any auction.	BritNed's regulatory framework does not include a financial floor as the case for other Interconnectors, therefore a Reserve Price is still required for BritNed going forward.
	E Capacity Usage	**We introduced Pre-Nominations possibility, that can be activated by the Participant per individual Nomination timescale.** How long in advance of the Gate Opening Time, this pre-nomination can be submitted ?	Pre-nominations can be entered at any point in time up to 1 year in advance, as soon as capacity is allocated. At Nomination Gate opening, these Pre-Nominations will be considered as regular Nominated Capacity and will also be firmed up as soon as the Gate closes. Before Nomination Gate Opening, the Pre-Nominations are still considered as Transmission Rights.

		We are planning to apply the same optimised curtailment rules for LT and DA as we already do for ID Transmission Rights in order to curtail as little capacity as possible in case of a Capacity Shortage. We agree if this reduce the curtailment for market participants.	Thanks for confirming and supporting this change.
	Schedule 2 Rules for use of PTRs	**The Day Ahead MNN gate close is extended from 13:30 to 13:50.** We agree with this as it provides market participants an extra 20min to nominate.	Thanks for confirming and supporting this change.
NGESO	Relationship between NTC Compensation Methodology and BN Access Rules	NGESO would like to further understand the instances where BritNed consider that the Access Rules and the Compensation Methodology do not align and the reasons for this Within Section E8 (capacity curtailment) References to methodology of curtailment appear to map to ITL's rather than NTC's, NGESO expects to see references to and compliance with NTC methodologies within the Access Rules. At what stage would BritNed be able to see the difference between LT Nominated and LT Allocated Capacity? To comply with the GB Compensation Methodology, this needs to be ahead of the DA Auction's NTC Deadline so that LT Allocated and LT Un-allocated capacity can be restricted (not LT Nominated). What happens in an Emergency/Force Majeure scenario where SOs can curtail interconnector capacities within gate?	BritNed is not bound by the GB compensation methodology and therefore does not need to reference to it. The NTC compensation methodology timely limited derogation granted by Ofgem was not implemented on BritNed and the respective feedback and reasons were shared with Ofgem and NGESO to the time. We still believe this methodology needs major updates to protect market parties and Interconnectors' interests.

		How is this factored into the capacity process? This is included in EU codes. What defines a capacity shortage? Is this defined as an interconnector fault/reduction in capability? If this is the case, the amendments to these access rules would not be compliant with the GB Compensation Methodology which states that ESO can curtail LT Allocated, DA Nominated & ID Nominated capacities.	
	Relationship between Capacity Restrictions and Pre-Bids	It must be noted that any pre-bids could be impacted by capacity restrictions. If a participant submits a pre-bid but an SO submits a capacity restriction (within the allowed timescales), the restriction would still be of unallocated capacity (not a curtailment of allocated capacity) so long at the capacity restriction is above the currently allocated capacity level prior to the auction opening.	Bids are not taken into account before auction opening, therefore there is not process impact from a capacity restriction as it will be taken into account when the Offered Capacity gets calculated and before any capacity get allocated to any bids.
	Trading	The intraday timings appear to be mostly the same (first one half an hour earlier) please can you confirm that section 5.2 in schedule 2 is in CET, if not this would make the nomination windows too short.	None of the Intraday timings has been changed. All timings are, as also stated in section 5.5 in CE(S)T.