

**Ørsted consultation response: Long-Term Hedging opportunities (FCA Regulation)**

*Company details*

1. This consultation response is sent on behalf of Ørsted, Headquartered in Gentofte (Denmark), with a Dutch office in the Hague. We develop and operate offshore windfarms, onshore wind and solar projects, electrolysis projects and have Danish Combined Heat and Power assets (bioenergy).

*Current use of hedging instruments*

2. in essence we use all hedging instruments at our disposal for monthly, quarterly, and yearly timeframes. The instruments are used (in NL) to hedge upwards market price exposure from the SDE+ base price.

*Need for hedging instruments*

3. Ørsted does both asset-backed trading and speculative trading.

4. Given the relative illiquidity of the Dutch market for hedging products cross-zonal hedging opportunities can aid in increasing the liquidity. This is also the case for hedging across the NO2-NL border.

*Are there sufficient hedging opportunities*

5/6. Currently large collateral requirements hamper sufficient hedging. A government guarantee system could decrease the required collateral and as such increase market liquidity. Both new hedging opportunities in an organized market and opportunities in a bilateral (brokered) market help increase liquidity.

*View on long-term transmission rights*

7. long-term transmission rights are a useful instrument towards hedging the cross-border market spread between two bidding zones. In this Ørsted prefers financial over physical LTR's and firm over non-firm LTR's.

8. Ørsted uses long term transmission rights (in NL) to hedge upwards market price exposure from the SDE+ base price.