http://www.nationalgrid.com/

Date: 24th of October 2025

Viking Link Access Rules Consultation

Dear Market Participants,

National Grid Viking Link Limited (NGVLL) and Energinet Systemansvar A/S (Energinet) are proposing an amendment to the Access Rules for the Viking Link HVDC Interconnector (1,400MW), which connect the British and Danish electricity transmission systems.

This consultation, which is in parallel with a separately run consultation by Energinet, opens on the date of this letter 24th October 2025, and will close on 21st November 2025.

The modifications being consulted on are:

1. **Change to Intraday Nomination Gate closure timing**

   Currently the Intraday Nomination Gate closes at hh:45. We are proposing to close 5 minutes closer to delivery at hh:50. This is to provide more flexibility for customers to adjust their nominations in response to changes in market conditions.

   If approved, this change will come into effect at a later date to the Access Rules document itself as it will be implemented as part of a wider nomination system update.

2. **More flexible requirements for transmission rights nomination**

   Requirements currently set out in the Access Rules state that nomination of transmission rights may only be made by the rights holder.

   Our proposed amendment allows for the transmission rights holder to have a nomination representative, which would allow a different entity to nominate.

3. **Intraday Curtailment (clarification):**

   To align with operational practice, removal of the TSOs' ability to curtail Intraday transmission rights due to an unplanned outage prior to Nomination Gate Closure. In this timeframe Intraday curtailment will only occur in the event of force majeure.

4. General Clarifications

Following customer feedback and internal review, we have updated the rules to provide further clarity of the below points. Please note, this is a clarification exercise and not a change to process.

- The definition of Deemed Metered Volume (DMV).

- The reference point when calculating the Loss Factor (LF).

- Clarity that the lowest value of NTC in an applicable hour will be used during a capacity shortage when applying a curtailment.

5. Harmonised Allocation Rules 2024 and 2026

Alignment with relevant aspects of Harmonised Allocation Rules (HAR) 2024 as introduced in the EU region in January 2024, and the ACER approved Harmonised Allocation Rules due to be introduced in January 2026.

The Appendices to this letter show the relevant articles in the Access Rules that correspond to these amendments.

Timelines and Next Steps:

We aim to implement these changes (subject to Access Rules approval) by the end of May 2026 with the following planned timelines:

i. Launch of formal consultation as per the date of this letter.
ii. Consultation Close date: 21st November 2025.
iii. Submission of Access Rules to NRAs – November 2025 (DUR) / December 2025 (Ofgem)
iv. NRAs Decision – March 2026

We will keep the market informed of any changes to these timelines.

Consultation documents:

This consultation includes tracked-changes of the proposed modifications for the Access Rules.

The consultation and supporting documents can be obtained on the Viking Link website, as follows:

https://www.viking-link.com/consultations

Consultation responses:

NGVLL would like to invite feedback from Market Participants on the consultation documents.

The latest date for responses to this consultation will be 18.00 CET on the 21st November 2025. All responses should be titled “Response to Viking Link Access Rules consultation 2025” and are to be submitted via email to Interconnectors.CustomerEnquiries@nationalgrid.com

When responding please state your contact details and whether you are responding as an individual company or representing the views of an association. All responses will be shared with Energinet so that we can make a joint assessment of the feedback, and will also be included within our submission to the NRAs.

If you have any questions in relation to any of the above, please contact:

Email: Interconnectors.CustomerEnquiries@nationalgrid.com

Yours faithfully

Sally Lewis
Head of Policy & Regulation
National Grid Ventures

Appendix 1 – Viking Link specific processes

The table below summarises the Access Rules articles that are subject to consultation, based on the corresponding topic

Change Proposed	Article
Removal of ability to curtail Intraday transmission rights due to an unplanned outage	Part 1 Rule 63 Triggering events and consequences of curtailment on Intraday Transmission Rights
Updated Intraday Nomination Gate closure timing	Part 1 Annex 1 Business Rules for Interconnectors
Updated requirements for transmission rights nomination	CHAPTER 7 Use of Transmission Rights Rule 46A Rule 46B Rule 47 Rule 48
General Housekeeping - Clarifications	Rule 64.1(a) Capacity Shortage Annex 1 Business Rules for Interconnectors – Deemed Meter Volume Allocation in GB: Part 1 and Part 2

Appendix 2 – Summary of changes requested under HAR 2024 and 2026

<u>Allocation Platform Participation Agreement Conclusion</u>

- To start the process of entering into a Participation Agreement, the market participant must provide the allocation platform with the Participation Agreement with either two (2) original signed copies of the Allocation Platform Participation Agreement or one (1) digital copy of the participation agreement signed with qualified electronic signature(s) which complies with the standard required by eiDAS Regulation No.910/2104 to be qualified as a "qualified electronic signature" (QES).

- Similar wording used for the Nomination Participation Agreement to harmonise with the Allocation Platform Participation Agreement (as above).

<u>Submission of Information</u>

- Market Participants to submit information related to credit institution based in the EU, GB or any other place where Allocation Platform performs cross border auction services. Participant obliged to select a financial institution subject to customer due diligence standards laid down in Directive (EU) 2015/849

<u>Refusal of application</u>

- If the market participant does not meet the legal requirements imposed by Article 9(1) of Regulation (EU) 1227/2011.

- If the market participant is an affiliate of another registered participant which has been suspended under the access rules.

<u>Form of cash deposit</u>

- The money shall be deposited in a dedicated Business Account at a bank selected by the Allocation Platform. The Registered Participant obliged to select a financial institution subject to customer due diligence standards laid down in Directive (EU) 2015/849

<u>Form of Bank Guarantee</u>

- The Bank Guarantee can be provided via a SWIFT message & Registered Participant Liable for receiving bank fees.

- Bank must be based in the European Economic Area, Switzerland, United Kingdom or any other place where Allocation Platform performs cross border auction services.

- The Allocation Platform shall confirm the acceptance of the amendment to the bank guarantee or the new bank guarantee or send a refusal note to the registered participant, at the latest four (4) working days after the receipt of the original of the amendment to the bank guarantee or the new bank guarantee.

Contestation of Auction Results

At the end of the Contestation Period Auction results to be considered binding

Auction Cancellation

- If the Registered Participants already paid any amount for a cancelled auction, such amount shall be refunded (excluding Intraday Auction Cancellation).

Invoicing and payment conditions

- Qualifying the Bank Account under Rule 8 – Submission of information
- Erroneous invoices correction & Settlement process
- Removal of alternative payment process

Payment disputes

- Bank account references under the new requirements
- The Registered Participant and the Allocation Platform now have fifteen (15) working days from notification to resolve payment difference

Late payment and payment incident / Modification of the collaterals

- After a recurring payment incident, the Allocation Platform may require change of Bank Guarantee Collateral to Cash deposit collateral.

Liability

- liability for indirect, consequential damages, loss of profit, loss of opportunity, loss of chance, trading losses exclusion
- Technical issue exclusions.
- Liability of Registered Participants for indirect, consequential damages exclusion.

Suspension of the Participation Agreement

- The suspended Registered Participant shall also not be entitled to use Transmission Rights.
- If the registered participant does not meet the legal requirements imposed by Article 9(1) of Regulation (EU) 1227/2011.
- If the registered participant is an affiliate of another registered participant which has been suspended under the access rules.

Termination of the Participation Agreement:

- If a Registered Participant received three single payment incident notifications within the same calendar year

- Registered Participant inactive in the business relationship with the Allocation Platform for more than fifteen (15) months

- If the Registered Participant is an affiliate of a Registered Participant suspended under the access rules

- If the Allocation Platform's banking partner(s) refuse to put at disposal of the Registered Participant a dedicated business account (or withdraw the same having previously provided it).

- Long Term Transmission Rights - All outstanding payment obligations should be settled any and all remaining instalments for the entire product period with a product period of one (1) or more months.