

## Response to the amended Access Rules of the Viking Link interconnector

Brussels, 21 November 2025

### Detailed comments

We support the proposed amendments, which will lead to streamlined, automated, and transparent processes across nominations, capacity handling, and settlement. The changes enhance clarity, reduce the need for parallel rule interpretation, and support lean operations.

#### Rule 4.3

We understand the need for coherent rules to be applied.

#### Rule 47

We welcome reducing the barriers to access the Viking Link interconnector to non-Danish and non-English entities via the introduction of nomination representatives. We support making capacity nominations more flexible and enabling collaboration between market participants where appropriate.

#### Rules 63 B and 63 C

The clarification that curtailments in intraday will happen only following a case of force majeure is welcome.

#### Annex 1

We welcome closing nominations closer to the operational hour in the intraday timeframe. We support clear communication about when changes will be implemented after the go-live of the updated nomination platform. Any changes to the go-live should be communicated so market participants can adapt their operations.

# CONSULTATION RESPONSE



More generally, we welcome clarifications and alignment with the newest HAR rules.

In addition, we would like to raise an issue regarding the day-ahead nomination deadline. At present, JAO publishes the auction results for the single day-ahead coupling at 11.55 GMT the day before delivery; the Viking Link nomination deadline is at 12.30, 35 minutes later. This is a divergence from other interconnectors' practice: for instance, the nomination deadline for IFA 1 and IFA 2 is at 1pm; Viking Link aligns with these interconnectors for long-term nomination deadlines but not in the day-ahead.

As SDAC result publication can be delayed - in particular following the move to 15-minute market time units - the Viking Link nomination deadline can be difficult to meet for market participants, especially as extensions to this deadline are only known on short notice.

For a smoother nomination process, we would appreciate it if the TSOs would consider aligning with IFA 1 and IFA 2 and move the nomination deadline to 1 pm GMT in the context of the broader update to the nomination system coming at a later date.

## Contact

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# CONSULTATION RESPONSE



## Response to the amended Charging Methodology for the Viking Link interconnector

Brussels, 21 November 2025

### Detailed comments

We welcome changes to the methodology that reflect changes in names, contact and address details. We support the inclusion of the website link to the Viking Link planned outages. We reiterate that planned outages should be communicated as early as possible and in advance of any capacity auctions.

We suggest that any of the modifications be highlighted or marked in Track Changes for better readability of the exact changes brought in the methodology.

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