

# CONSULTATION RESPONSE



## Response to the amended Nemolink interconnector Access Rules

Brussels, 23 January 2026

### Detailed comments

- 1. Do you have any objections to the house-keeping alignment with the Harmonised Allocation Rules?*

Generally, none. We have some clarification questions regarding when the modifications are enacted and future changes – what is to be done in any intermediary phase.

- 2. Do you have any feedback on our transition to a Market Time Unit (MTU) based approach across the Access Rules?*

We support introducing more flexibility, with the possibility of finer granularity in the Market Time Units, for both the day-ahead and intraday timeframes. We encourage mirroring changes made at the EU level for consistency with the 15-MTU switch in both DA and ID. Finer granularity contributes to better integration of renewable energy sources and a more efficient use of cross-border transmission capacity.

It also makes sense to combine changes together that are related and impacted by a modified MTU, such as the number of nomination gates. We wonder with the removal of the 24 nomination gates in intraday whether, when the rules are adopted, if they will, in practice, remain until a new MTU is implemented. We also appreciate further clarity on and what is to be done in that intermediary phase.

Market participants would appreciate sufficient notice when a change of MTU and all associated technical changes to better prepare operationally. We encourage as much advance notice as possible.

# CONSULTATION RESPONSE



Overall, we emphasise the need for transparency and good communication when establishing changes like a finer MTU.

- 3. Do you have any views on the removal of 'emergency situation' as a curtailment scenario after the Day-Ahead Firmness Deadline (DAFD) in the Long-Term and Day-Ahead rules?*

We support this positive development that reinforces physical firmness.

- 4. Do you have any feedback on the revised calculation method for the Loss-Adjusted Day Ahead market spread, which now incorporates 15-minute MTU prices in line with EU regulations?*

Market participants would like to ensure there is no potentially negative impact, wondering if compensation equivalence is maintained in the new calculation in the case of negative quarter-hours at 0. We generally alignment with EU-level changes into the rules. We also reiterate support to Nemo Link's wider considerations for finer granularity of the MTU in the DA and ID timeframes.

- 5. Do you have any comments on the changes in Section A–M of the General Provisions?*

We appreciate the clarifications of different actors, their roles and the procedures.

- 6. Do you have any feedback on the proposed new Day-Ahead nomination gate?*

We support the introduction of an earlier opening and later closing of the DA nomination gate, especially if it builds off previous market participant requests.

- 7. Do you have any views on the inclusion of a formal definition for the "contestation period" within the Access Rules?*

No comment.

# CONSULTATION RESPONSE



## *8. Do you have any feedback on the proposed removal of fallback auctions based on default bids in the Day-Ahead rules?*

Market participants find that relying only on postponement/rescheduling rather than fallback auctions with default bids is more efficient and operationally simpler. We would also appreciate continued dialogue and transparency on the alternative fallback solutions on the interconnector.

While Nemo Link is not included in the EU market coupling, we wonder if the interconnector operators and system operators are keeping track of the EU Single Day Ahead Coupling fallback discussions, should there be any future advances in EU-Great Britain talks in reintegrating the GB electricity market into EU internal energy market processes.

## *9. Do you have any comments on the housekeeping and general clarification updates?*

None.

## Contact

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