

Response to the North Sea Link Access Rules and Charging Methodology modifications

Brussels, 24 April 2026

Key messages

- We support the introduction of intraday auctions, Long-Term Transmission Rights (Financial Transmission Rights) on the National Grid side of the cable and a change in Market Time Unit for Day-ahead.
- We strongly support ETS linkage negotiations between the UK and the EU and hope for a positive outcome.
- Concerning the flow tariff, we understand the reason behind it with the implementation of the EU Carbon Border Adjustment Mechanism; nonetheless, we would require further information on the calculation methodology.

Detailed comments

Intraday auctions

We support the introduction of intraday auctions. The granularity of the results reflects well the current Market Time Units on both sides. With the ongoing negotiations following the EU-UK rapprochement on electricity markets, we invite National Grid to consider matching a 15-minute granularity in GB for the future on the interconnector.

Concerning the timing of the auction, they appear adequate. We raise awareness of the different auction timings on all GB interconnectors and the interactions it has on trading operations.

FTRs

We welcome this positive addition of LTTRs on the NSL cable in the form of FTRs. The provision of LTTRs will increase hedging opportunities for market participants in the UK and Norway and support forward market liquidity.

CONSULTATION RESPONSE



On a general note, we would appreciate a clear calendar for implementation once the Rule modification is approved and that there is sufficient lead time for market participants to ready themselves.

We would welcome further insights on what types of bilaterally agreed hedging products would be offered in parallel of FTRs. Any clarification is appreciated.

More precisely, we would like to have more information on the timing of the 1st auction, and the products offered (Monthly, Yearly, Quarterly ?).

DA MTU

We welcome the finer granularity. As highlighted above for intraday, with negotiations opening on EU-GB electricity re-integration, we recommend consideration in the future to an even finer granularity of 15 minutes MTU. This would help align further the GB electricity markets with European ones, facilitate product matching on interconnectors, and help integrate RES.

Flow Tariff

We strongly reiterate our support of ongoing EU-UK negotiations on linking the EU and UK ETS. The linkage will help provide a bigger carbon market and facilitate respective CBAM obligations.

The elaboration of a flow tariff is a key element that market participants appreciate transparency and involvement in the design/development. Further clarity on the means to calculate the flow tariff value, the implementation process and timeline is appreciated. We are concerned that a flow tariff will impact the efficiency of cross-border trading between the UK and Norway.

While we understand the reasons for a proposed flow tariff, we suggest that the TSOs work with the Tax Authorities and Government's on both sides of the cable to understand

CONSULTATION RESPONSE



if there is an alternative and pragmatic approach to managing the CBAM obligations that does not expose the interconnector owners to additional costs or impact cross-border flows.

We enquire at which regularity the flow tariff is to be calculated (Will it be on a weekly basis? Monthly? Quarterly? Yearly?), as EU CBAM costs include CBAM Certificates, which will be determined on a weekly basis from 2027.

Charging methodology changes

No issue with the modifications and additions.

Contact

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