

## Annex 1

### NTC Commercial Compensation Methodology for GB Interconnector Capacity Management Consultation Responses summary

Table 1

Summary of responses and key themes from the consultation responses and NGESO comments. For responses provided on the official template we have only included the specific questions the provider responded to, all other questions should be assumed as “no comment” from the provider. Where providers have submitted detailed letters or their response is very detailed on the response template NGESO has summarised the response into key themes.

<b>Respondent</b>	<b>Response or Key Theme</b>	<b>NGESO Comments</b>
Eleclink	<ol style="list-style-type: none"> <li>1. Views not being considered</li> <li>2. Use of NTC term</li> <li>3. Clarity on use of DA Capacity Calculation and ID Capacity calculation</li> <li>4. Principles of use - 2a timing of ID/DA NTC</li> <li>5. Principles of use - 5 where 2 I/Cs both contribute to a constraint</li> <li>6. Table 1 to be updated</li> <li>7. Future developments - correction factor and analytical methodology for scrutiny</li> <li>8. Implementation method - further clarity</li> <li>9. Appendix 1 - the calculation process - allocated capacity before FD</li> <li>10. Appendix 1 - the calculation process - unallocated capacity C.(4)a</li> <li>11. Invoicing</li> </ol>	<p><b>1. Views not being considered</b> NGESO regrets that it is felt that not all the previous comments made have been fully considered and/or taken into account in the development of the methodology. We can confirm that all comments raised are considered however there are a wider range of stakeholders that each have a unique view on NTCs and it has been complicated to develop a single GB methodology to take all positions into account.</p> <p>Furthermore, there are genuine differences of opinion and NGESO has answered in an honest way instead of changing the methodology in a way that we believe abandons the underlying principles agreed by all parties.</p> <p><b>2. Use of NTC term</b> As we have previously replied to ElecLink we believe that everyone understands what we mean by this term and how it is used in the document, we have however tried to clarify and be consistent as much as possible in either referring to: NTC; value, limits, process or service.</p> <p><b>3. Clarity on use of DA Capacity Calculation and ID Capacity calculation</b>  The methodology is intended to be holistic such that it is clear what methodology will be used once the socio-economic welfare data can be provided. We feel that we have been clear in what will apply to Eleclink</p>

		<p>(table 1, box 4), and do not feel that the commercial methodology needs to be updated given this clarity. The commercial methodology has always been a document that sets out what happens from a commercial perspective when an NTC is placed. It is not intended to set out how or when an NTC is placed (this should be in capacity calculation, which was previously covered in the CACM/FCA methodologies, and is now covered in the TCA Technical Working Procedures); the cover note was drafted to try and make this more clear. We feel it would be contradictory to put this within the commercial methodology as there are currently on-going talks regarding capacity calculation and do not wish to cross-contaminate these documents and discussions.</p> <p>We would only curtail allocated capacity in line with the TCA, i.e. in an emergency situation (such as system or process failures)</p> <p><b>4. Principles of use - 2a timing of ID/DA NTC</b>  We understand your concern, this ‘assessment’ of ID liquidity is really intended for <i>new</i> trading arrangements into less established markets eg if an ID product were to be offered/created between GB and NO as this would be new territory. It was not intended for arrangements such as a new IC offering a well understood ID product into a well established market eg GB to FR.</p> <p>We do clarify what we mean by ‘established’ to avoid confusion. This is intended to cover situations where a <i>new</i> ID market or service is introduced, and confidence and/or liquidity must first be built up before it would be acceptable to solely rely on this mechanism in lieu of DA NTC limits. This explanation has now been added to the methodology to provide further clarity.</p> <p><b>5. Principles of use - 5 where 2 I/Cs both contribute to a constraint</b>  Principle of use 5 has been updated to clarify the process that would be applied. The available capacity will be shared proportionally wrt an ICs maximum capacity but there are also other factors such as the effectiveness of each IC in alleviating the constraint and what nominations have already occurred.</p>
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		<p><b>6. Table 1 to be updated</b> Table 1 has been updated to include Eleclink, apologies that this was missed.</p> <p><b>7. Future developments - correction factor and analytical methodology for scrutiny</b> Thank you for your suggestion. We agree that analytical methodology would be useful to have in advance of the correction factor being amended. We would like to continue this conversation once the current methodology has been implemented so that it is not delayed further. NGESO welcome a suggestion from industry on what this analytical methodology could entail. We have amended this section of the methodology to try and make this clear.</p> <p><b>8. Implementation method</b> – As you have alluded to in your response, additional detail intended to clarify which borders will have which mechanisms applied is included within the cover letter. We also point you to the first bullet point in section 1 (Purpose) of the methodology which states which projects are covered.</p> <p><b>9. Appendix 1 - the calculation process - allocated capacity before FD</b> We agree with the point that this section should refer to the access rules which the table clearly states. During the development of the methodology a number of parties asked us to demonstrate how calculations could be carried out (e.g. did the required data sources exist). The calculation in section C.1 is purely for illustrative purposes and does state that its only for explicit arrangements. We have updated this wording to make it clear that this is just an example calculation and that the access rules take precedence.</p> <p><b>10. Appendix 1 - the calculation process - unallocated capacity C.(4)a</b> Point a) we accept the point that human behaviour can change as a result of a capacity restriction. One of the assumptions made at the start of this work was that the bid curve will be assumed to be unchanged. This is because it is very difficult to account for this human behaviour, we cannot</p>
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		<p>know the alternate. However, in our many meetings on this we did give a qualitative explanation of why we believe bidding behaviour will not change based on the relatively small restrictions and the sheer number of auctions taking place across different ICs. Hence, we believe that the underlying assumption is sound but accept it is impossible to fully mathematically model human behaviour. Secondly its also not an unreasonable assumption as for most cases the requested capacity far outnumbers the offered capacity in ID auctions regardless of any restriction so for most cases of mild restrictions, this effect is likely to be small. We are open to means of capturing this behavioural effect but as yet have seen no proposals to this end.</p> <p>Point b) we agree, another assumption was that all explicit capacity is always sold which is the experience to date but the proposal makes account for cases when this might not happen. We will amend the formula accordingly.</p> <p><b>11. Invoicing</b> The NGESO settlements team intend to use a standardised Invoicing Process, as detailed within the consultation document, to ensure equal treatment across interconnectors.</p>
Statnett	<p>1. <b>Operational decision-making</b> - NTC restrictions should be introduced after other available options have been investigated and other suitable means applied, minimizing the negative impact on the market.</p> <p>2. <b>Sharing principles</b> - Our view is that potential need for capacity restrictions must be fairly shared between different interconnectors. This principle should be applied even in cases where restrictions are financially compensated by NGESO.</p>	<p>1. The 'principles of use' make it clear that the calculation for NTC's (that are then submitted) include exhausting all other feasible options first as part of the security assessment and that NTC limits are exactly that, the limit of what flow can possibly be secured. NTCs are not used to alter any already scheduled flow where market options exist.</p> <p>2. NTCs are placed on interconnectors due to a specific security issues. Where there are multiple interconnectors contributing to the system issue, the NTC will be shared equitably to ensure the system issue is rectified as per 'principles of use' 5. Note that the wording has been updated to reflect this feedback.</p>
BritNed	<p><b>Question 1</b> Comment 1 - allocated capacity restriction is not allowed Comment 2 - day ahead capacity restrictions Comment 3 - other tools are more appropriate Comment 4 - compensation does not keep ICs whole</p>	<p><b>NGESO Questions 1 Response</b></p> <p>1. Regarding allocated capacity restrictions not being allowed, the Trade and Co-operation Agreement (TCA) makes no reference to allocated or unallocated capacity. It does state that interconnector capacity</p>

	<p>Comment 5 - NTC erode market investment signals  Comment 6 - lack of co-ordination and transparency  Comment 7 - impact on IC capacity market contract obligations  Comment 8 - ICs and market parties should be kept whole</p> <p><b>Question 2</b>  Comment 1.1 - legal standing of cover note and limiting use of NTC to ID unallocated capacity  Comment 1.2 - NTC restrictions as a tool of choice  Comment 1.3 - Timing of NTC action  Comment 1.4 - The response to an NTC action from NGESO could impact contract commitments under a Capacity Market contract  Comment 2.1 - The definition of 'emergency situation'  Comment 2.2 - The use of NTCs for unallocated capacity  Comment 2.3 - The potential future use of NTCs for Allocated capacity  Comment 3.1 - Compensation for NTC restrictions masking investment signals  Comment 3.2 - Discount factor applied to compensation does not keep interconnectors whole and does not reflect the costs of the restriction measures taken"  Comment 3.3 - Impact on Long-term hedging market</p>	<p>must be maximised subject to secure system operation. NTCs are in line with this requirement.</p> <ol style="list-style-type: none"> <li>2. Regarding day ahead capacity restriction, NGESO have committed to not placing NTCs on channel interconnectors in the day ahead timeframe until data can be provided to support socio-economic welfare analysis that shows the impact of such an action.</li> <li>3. We disagree with the point made, NTC's do not directly change IC flows, 'principle of use 3' make it very clear that NGESO will 'move' the IC flow through other mechanism. The calculation for NTC's (that are then submitted) include exhausting all other feasible options first as part of the security assessment and that NTC limits are exactly that, the limit of what flow can possibly be secured. NTCs are not used to alter any already scheduled flow where market options exist.</li> <li>4. Regarding compensation not keeping ICs whole, one the commitments of the methodology is that no 'adjustment factor' will be applied until such time that actual data can be gathered, and the analysis shows a clear relationship. In the meantime, this is all moot as under explicit coupling (in the absence of implicit coupling) the bid curve can be read which directly shows the change in congestion revenue resulting from any restriction and so no adjustment is necessary.</li> <li>5. We do not believe NTCs are market intervention, they are an input to the market in order for proper functioning. This commercial compensation methodology ensures that the direct cost of the restriction is calculated and is transparent, this will ensure that the right investment signals are clear and present in order to appropriately consider future investment, either in networks or further interconnection.</li> <li>6. Firstly regarding the lack of engagement with the adjacent TSO in calculating NTCs, NGESO have been clear that the commercial methodology is separate from the capacity calculation discussions. Where there is a link (the types of auctions that occur and the associated methodology for compensation), we have made changes to the methodology and would suggest that this is reviewed once there is clarity on the capacity calculation. NGESO do not believe that lack of a co-ordinated capacity calculation should hamper the commercial compensation methodology being introduced and used. In addition, NGESO have invited comment from connecting TSOs as</li> </ol>
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		<p>part of this consultation and have received one response from a connecting TSO. That said, we note that work has started under the Trade and Cooperation Agreement, lead by NGESO, to develop and agree Capacity Calculation methodologies to ensure better transparency and coordination. NTCs are placed on interconnectors due to a specific security issues. Where there are multiple interconnectors contributing to the system issue, the NTC will be shared equitably to ensure the system issue is rectified as per 'principles of use' 5. Note that the wording has been updated based on this feedback.</p> <p>7. Regarding the impact on capacity market obligations NGESO notes BritNed's comments in relation to potential consequential impact on capacity market revenues from application of NTCs. We agree that there are parallels with the scenario where an interconnector's ability to fully meet capacity market obligations are impacted when they are providing ancillary services to a System Operator. As you observe currently under such instances the IC is held neutral to any commercial impact under the rules of the GB CM Rules however NTCs are not classified as an ancillary service in the rules. This impact should be raised with Ofgem who administers the CM rules who can consider whether the rules should be adapted accordingly.</p> <p>8. Regarding the comment on keeping ICs and market participants whole, we note your support for this principle.</p> <p><b>NGESO Question 2 Response</b></p> <p><b>1. General Feedback</b></p> <p>1.1. Regarding the legal status of the cover note, it is not a legally binding document, and will not be approved by OFGEM. It is only intended to give context to the consultation. However, the NTC process/tool will be the subject of a C16 consultation to add it as a balancing service into the procurement guidelines and this will outline the same occasions that may result in an NTC being applied. As OFGEM approve the procurement guidelines, it will follow a formal approval process.</p> <p>1.2. The 'principles of use' make it clear that the calculation for NTC's (that are then submitted) include exhausting all other feasible options first and that NTC limits are exactly that, the limit what</p>
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		<p>of what flow could possibly be secured, NTCs are not used to alter the flow directly.</p> <p>1.3. Security assessment is done continuously throughout the DA &amp; ID timeframe. Submissions are made ahead of time to ensure the worst-case scenario is properly reflected and updated accordingly as the view of the situation changes/improves towards delivery. The exact details of this process is to be captured within the specific trilateral OPs.</p> <p>1.4. Regarding the impact on Capacity Market payments see above (Q1 comment 7).</p> <p><b>2. Commercial Methodology Cover Note</b></p> <p>2.1. Regarding the definition of an “emergency situation”, it is not a legally defined term in GB (or previously in the European network codes). The Trade and Co-operation Agreement is clear that capacity must be maximised over interconnectors subject to “i) secure system operation, ii) and efficient use of systems”. Furthermore, it then states that “interconnector may only be curtailed in emergency situations and any such curtailment takes place in a non-discriminatory manner”. NGESO will act in accordance with these requirements. Given that the consultation focuses predominantly on the commercial methodology following application of NTC, and not the requirements under which an NTC can or cannot be placed, NGESO do not believe that it is necessary to define emergency situation in order to agree the commercial methodology. If parties are concerned, the TCA Technical Procedures would be a better place to scope these definitions.</p> <p>2.2. NGESO have been clear in that we will place an NTC on an interconnector when there is no other viable alternative for rectifying a system issue. System issues cover RoCoF, margin or thermal issues. Should these systems issues not be fixed, it could result in an emergency situation. NGESO consider this to be in line with requirements of the TCA to “<i>maximise interconnector capacity subject to secure system operation</i>”. On the second point raised regarding the non-discriminatory manner, NTCs will only be placed on interconnectors where there is a system issue. System issues are non-discriminatory, and therefore the NTC tool is also (by extension) non-discriminatory.</p>
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		<p>2.3. Regarding the future use of NTCs on allocated capacity, NGESO cannot agree to suggestion to remove the right the exclude placing NTCs on allocated capacity in the future. We understand the hesitancy from across GB interconnectors, and have listened to feedback from all parties concerned. NTCs curtailing allocated capacity would only occur in rare, emergency situations when some other ID service has failed to move the scheduled commercial position. In any case the capacity would not be taken away from the holder, the NTC would stop the IC from flowing the full commercial position thereby making the IC accrue an imbalance position which is what the commercial methodology proposes NGESO would pay the IC for.</p> <p><b>3. Commercial Compensation Methodology</b></p> <p>3.1. See response to 1.5, we believe having a commercial compensation mechanism does in fact do just this. It endeavours to accurately value the direct impact of the 'lost' capacity and transparently signals this to the market.</p> <p>3.2. One the commitments of the methodology is that no 'adjustment factor' will be applied until such time that actual data can be gathered, and the analysis shows a clear relationship. In the meantime this is all moot as under explicit coupling the bid curve can be read which directly shows the change in congestion revenue resulting from any restriction and so no adjustment is necessary.</p> <p>3.3. This seems irrelevant to the NTC commercial methodology. The access rules state that long term un-nominated capacity is compensated at the day ahead marginal clearing price since implicit coupling ceased. If Britned thinks this process reduces the effectiveness of the long-term hedge this should be fed into the TCA coupling discussions. In addition, we would point out that after the FRCR changes the use of NTC for RoCoF will reduce significantly (both frequency and magnitude)</p>
Nemo Link	Question 1	Question 1



	<p>Welcoming of consultation following extensive discussion. There are a number of outstanding points that require a response.</p> <p><b>Question 2</b>  Formatting of paragraphs  What are NTCs?  Commercial Principles  Principles of Use (4b &amp; 7)  Table 1  Appendix 1 – Settlement</p>	<p>A material number of points were raised in response to the consultation which NGESO has answered in detail and therefore we trust that the industry will now be able to support the arrangements.</p> <p><b>Question 2</b>  Thank you for your suggestion on formatting. The document has been updated for ease of reference.</p> <p>Regarding the comment on the suggestion raised to make it clearer on what NTC is, NGESO agree and have updated the wording to ensure it is clear that NTC is a numerical value for capacity on interconnectors.</p> <p>Regarding the comment on the commercial principles; we have amended the methodology to make this clearer in point D. we have also made it clearer that when the IC trips, no <i>'further'</i> compensation will be paid.</p> <p>Regarding the comment on principles of use (4b), we agree, as a prudent SO all options are considered and exhausted where possible, but as inter TSO emergency assistance is not always available it is still prudent and therefore necessary to submit the NTC as per 4b as a precaution.</p> <p>Regarding the comment on principles of use (7), this point regards the logic of how an NTC would be applied, not calculated. You are correct that due to the timings this cannot be an input, indeed the level of long-term capacity that has been nominated will not be known when the NTC is calculated and submitted. Therefore, this is regarded in how the NTC is applied. We believe that nominated long-term capacity should be treated differently. As un-nominated capacity has a remuneration mechanism already in the access rules the capacity holder is essentially unaffected by any restriction as they will still receive the remuneration they were expecting.</p> <p>Regarding the comment on table 1, see point above, the capacity holder would still receive the UIOSI pay-out they were expecting.</p> <p>Regarding the comment on box 4.b; presuming you mean using a loss-adjusted DA spread for that MTU? If this is significantly positive then the assumption is that all capacity would have already been utilised DA phase.</p>
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		<p>The proposal in the methodology is working with the assumption that there was a negligible spread and thus not fully utilised at DA and some capacity has been left over to be sold in the ID (but that has now been restricted). We accept that using a historic average (in both directions) is not perfect but should give a reasonable value of the 'optionality' of this capacity had spot energy prices moved from DA levels.</p> <p>Regarding the comment on settlement, the formulas presented here are illustrative of the calculations required. Specific details on formulas will be developed during implementation.</p>
Moyle	<p><b>Question 1</b>  Agree to aspects of the methodology and recognise improved engagement. Still some outstanding points.  Coordinated capacity calculation  Principles of use  GB Commercial Methodology</p> <p><b>Question 2</b>  Settlement</p>	<p><b>Question 1</b>  Thank you for taking the time to submit a response. A material number of points were raised in response to the consultation which NGESO has answered in detail and have adjusted the proposal as appropriate and therefore we trust that the industry will now be able to support the arrangements.</p> <p>Regarding the co-ordinated capacity calculation points raised, NGESO understand that there has been a large change in regulatory documents and methodologies over the past 12 months. NGESO have been clear that the commercial methodology is separate from the capacity calculation discussions. Where there is a link (the types of auctions that occur and the associated methodology for compensation), we have made changes to the methodology and would suggest that this is reviewed once there is clarity on the capacity calculation. NGESO do not believe that lack of a co-ordinated capacity calculation should hamper the commercial compensation methodology being introduced and used.</p> <p>NGESO have invited comment from connecting TSOs as part of this consultation and have received one response from a connecting TSO. The commercial compensation methodology is between NGESO and the connected interconnectors.</p>

		<p>Regarding the principles of use points raised, NTCs will be used if alternative market actions will not fix the system issue. If the system issue persists, emergency tools may also be used.</p> <p>The Trade and Co-operation Agreement is clear that capacity must be maximised over interconnectors “<i>subject to secure system operation, ii) and efficient use of systems</i>”. NGESO believes that placing an NTC on an interconnector for unallocated capacity is in line with this requirement. Furthermore, it then states that “<i>interconnector may only be curtailed in emergency situations and any such curtailment takes place in a non-discriminatory manner</i>”. Placing an NTC on an interconnector for allocated capacity is in line with this requirement. NGESO will act in accordance with these requirements. This consultation focuses only on the commercial methodology, and not on the application of the NTC itself.</p> <p>Regarding the points raised in relation to paragraph 1(b), NGESO are responsible for running the system securely and efficiently. This includes regularly and routinely assessing system needs and actions in order to balance the system. It is an ever-changing situation, where a set of circumstances mean that one action on one particular day may make sense, but on another day may not be used. As such, NGESO agree to the change in wording suggested.</p> <p>Regarding the point raised for paragraph 2, we understand your concern regarding IDA1 however this is not just the first but also the last opportunity to feed into market processes for the ‘<i>early</i>’ hours (23:00 to 11:00) of the day so this must be maintained. However, IDA2 does provide a second (and final) opportunity for the ‘<i>latter</i>’ hours (11:00 to 23:00) of the day so we are happy to agree that no NTCs will be submitted for this latter period under IDA1.</p> <p>Regarding the points raised for paragraph 5, we agree and have amended the methodology accordingly to recognise this principle of ‘equitable treatment’</p> <p>Regarding the points raised for firmness deadline, we agree but have kept the wording general in the methodology to account for subtle differences between each IC’s arrangements as this is now not a unified term. You are</p>
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		<p>correct that the precise definition should be properly detailed in the implementing agreements.</p> <p>Regarding the GB commercial methodology points raised; you are correct, it is inconsistent to refer to FTRs when they are not currently in place. This reference has been removed. Whilst every effort has been made to ensure this methodology is ‘future looking’ it is impossible to make it ‘future proof’ as so many aspects of IC trading arrangements are yet to be agreed as part of the TCA. Once more detail is firm regarding future arrangements this document will be updated.</p> <p>The principle at stake here is to ensure no-one is under or overpaid. This is true for the IC owners but also for the sake of the consumer. Therefore, the preference has always been to simply re-run the coupling algorithm to obtain true and fair results taking account of any restriction. This approach was unfeasible when examining the entirety of the EU Euphemia process. Hence the historic discussion of an ‘adjustment factor’. As you know a commitment was then made within the methodology that no ‘adjustment factor’ will be applied until such time that actual data can be gathered, and the analysis shows a clear relationship due to the difficulty in agreeing such a process. However now that the coupling process (&amp; order book) significantly smaller for specific borders such as the SEM-GB BZB, the original approach is again now feasible and therefore preferable in order to obtain fair results for all parties.</p> <p><b>Question 2</b></p> <p>NGESO will only implement NTC arrangements, in parallel with agreeing the commercial specifics which are consistent with the GB NTC Commercial Methodology. That withstanding, NGESO has an operational requirement to continue to have access to existing interconnector capacity management tools e.g. ITLs in the interim.</p> <p><u>Settlement</u></p> <p>We have provided the settlement annex in the Methodology to help to illustrate how payments related to the applied of NTCs would be settled. Commercial and settlement arrangements vary between specific</p>
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		<p>interconnectors so this annex was somewhat generalised and the precise settlement detail will have to be confirmed and developed on an interconnector by interconnector basis.</p> <p>Many thanks for raising the specific elements that are not appropriate for the GB – SEM border interconnectors which will facilitate the development of commercial arrangements for Irish border links.</p>
NGV	<p><b>Question 1</b> Agree to aspects of the methodology and recognise improved engagement. Still some outstanding points.</p> <p><b>Question 2</b> Use of “Unrestricted” Bid Curves and Discount Factors Use of Interconnector Capacity Restrictions Impact on Capacity Market Revenues Cost-Benefit Assessment of a move to Day Ahead Restrictions Implementation</p>	<p><b>Question 1</b> Thank you for taking the time to respond to the consultation and noting the progress that the working group has made with developing the Methodology. NGESO notes that a number of issues were raised during the consultation process and in response we have either amended the final Methodology text accordingly or have clearly further explained our position in response.</p> <p><b>Question 2</b> Regarding the use of unrestricted bid curves and discount factors, we welcome your comments on supporting a delayed view on adjustment factors until such data and analysis is available for a full and informed discussion. We also thank you for providing some example data in the annex to support your view. Firstly, we re-iterate the principle of use 2.b that NTCs will not be used in the DA timeframe (for ICs with an established ID market) until more is understood on the socio-economic impact of these restrictions. Therefore, referencing data from the DA timeframe is less applicable for ID payment calculations. Additionally, we note that the data supplied is from days during (partial) IFA outages which potentially affects the outcome. Furthermore, the two days have quite strong spreads compared to the ‘normal’ and though they have similar spreads to each other, they are from quite different absolute energy prices which also plays a part in affecting the outcome. In general, we understand your concern and proposal to use % spread capture rather than the bid curve directly and are open to assessing this but as yet have not seen sufficient data (from the relevant market timeframe) to properly assess this approach. We are happy to continue discussion in this area and have an informed conversation based on data.</p>

		<p>The definition of a non-frequency AS is wide ranging. In the methodology we define the subset of cases where we would use NTC and this will be carried forward into procurement guideline amendments that will be the subject of a C16 consultation. Hence, there is no need to name the other cases in the methodology.</p> <p>NGESO notes NGV's comments in relation to any potential consequential impact on capacity market revenues. We believe there are parallels between the situation when an interconnector's ability to fully meet capacity market obligations when it is providing ancillary services to a System Operator. In such instances the IC is held neutral to any commercial impact under the rules of the GB CM however at present NTCs are not covered in the same way. This impact should be raised with Ofgem who administers the CM rules who can consider whether the rules should be adapted accordingly.</p> <p>Regarding the cost-benefit analysis of day ahead capacity restriction, we are pleased that NGV concur with the suggested approach and look forward to working together on the analysis.</p> <p>Regarding the comments on implementation, NGESO agrees that all interconnectors continue to be treated the same when implementing changes to Operating Procedures to give effect to NTC restrictions and subsequent compensation. Adequate time will be allocated to make the required changes following a review of the impact and scale of change, interconnectors will be offered the ability to make the changes at the earliest opportunity.</p>
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