

Annual EMR Compliance Report

National Grid Electricity Transmission plc

Prepared pursuant to paragraphs 2N.25 and 2N.26 of Special Condition 2N of the Electricity Transmission Licence granted to National Grid Electricity Transmission plc (registered in England with number 2366977 and whose registered office is at 1-3 Strand, London WC2N 5EH) under section 6(1)(b) of the Electricity Act 1989

21st June 2019

1. Introduction

Paragraph 25 of Special Condition 2N of the Electricity Transmission Licence (“Licence”) granted to National Grid Electricity Transmission plc (“NGET”) requires NGET to produce an annual report in a form approved by the Authority covering its compliance during the relevant year with the EMR Relevant Duties (as defined in the licence) and implementation of the practices, procedures and systems adopted in accordance with the EMR compliance statement.

This is the annual report in respect of the period 1st May 2018 to 31st March 2019 (“the Period”). On 1st April 2019, Special Condition 2N was removed from the NGET Licence and transferred to the new licence granted to National Grid Electricity System Operator Ltd (NGESO). The report covers an 11 month period to the point of removal of the obligation from the NGET Licence. This is NGET’s final report relating to Special Condition 2N compliance.

Definitions

For the purpose of this report, unless otherwise indicated, the following definitions set out in Special Condition 2N (Electricity Market Reform) of the NGET licence apply:

“**Associate**” means:

- (a) an Affiliate or Related Undertaking of the licensee;
- (b) an Ultimate Controller (as defined in Standard Condition A1 (Definitions and interpretation)) of the licensee;
- (c) a Participating Owner of the licensee; or
- (d) a Common Control Company.

“**EMR Administrative Team**” means the team established or to be established by the licensee in accordance with paragraph 2N.7 of Special Condition 2N.

“**EMR Compliance Officer**” (“**EMR CO**”) means the compliance officer appointed or to be appointed by the licensee in accordance with paragraph 2N.19 of Special Condition 2N

“**EMR compliance statement**” is defined under paragraph 2N.14 of Special Condition 2N

“**EMR Data Handling Team**” means the team established or to be established by the licensee in accordance with paragraph 2N.5 of Special Condition 2N

“**EMR Relevant Duties**” means the licensee’s obligations pursuant to Special Condition 2N

“**EMR Functions**” has the same meaning as the term “EMR functions” in Chapter 5 of Part 2 of the Energy Act 2013

“**Confidential EMR Information**” (“**CEMRI**”) means all Information disclosed to or acquired in any way (and whether directly or indirectly) by the licensee or any of its agents or representatives by virtue of the performance of EMR Functions by the licensee, but excluding:

- (a) all Information that is in or has entered the public domain otherwise than as a direct or indirect consequence of any breach of this licence;

- (b) all Information which the licensee can demonstrate was lawfully in its written records prior to the date of disclosure of the same by the owner of the Confidential EMR Information or which it received from a third party independently entitled to disclose it; and
- (c) all Information properly received in the usual course of the licensee's activities pursuant to paragraphs (a) to (c) (inclusive) of the definition of Permitted Purpose.

“Confidential EMR Administrative Information” (“CEMRAI”) means Confidential EMR Information disclosed to or acquired by the licensee by virtue of its role in performing EMR Administrative Functions.

“NGET” means National Grid Electricity Transmission plc

“Relevant Other Competitive Business” (“ROCB”) means the business of:

- (a) participating in, or intending to participate in, a competitive tender exercise to determine a person to whom an offshore transmission licence is to be granted;
- (b) an Offshore Transmission Owner;
- (c) undertaking carbon capture and storage activities; or
- (d) owning and/or operating an entity participating in, or intending to participate in activities which require a licence under section 6(1)(e) of the Electricity Act 1989.

“Shared Services” means shared corporate services as specified in the EMR compliance statement

“Single responsible Director” has the meaning given in paragraph 2N.20 of Special Condition 2N

2. Compliance with the EMR relevant duties

The EMR Compliance Officer (“EMR CO”) has undertaken monitoring during the Period to assess the effectiveness of the practices, procedures and systems adopted to secure compliance with the EMR Relevant Duties.

As part of this process, Licence Advisers in System Operator, Electricity Transmission, Capital Delivery, Finance and Business Services, IS, Regulation, Procurement, NG Ventures, Corporate Affairs and Tax and Treasury were asked to complete a business separation framework document based on targeted questions and describing the controls, frameworks and processes in place within their business areas to secure compliance with the relevant duties. The matters considered and the overall outcome for each relevant objective as agreed with Ofgem are detailed below under paragraphs a to e.

The Licence Advisers provided positive assurance that the controls, frameworks and processes in place are adequate to secure compliance with the EMR Relevant Duties and evidence has been provided where necessary to substantiate the statements made. The EMR CO's team has met with the Licence Advisers to challenge and review the framework and questions and share any compliance best practices identified.

As part of the monitoring the EMR CO has liaised with the Risk, Compliance and Audit teams to understand whether any key risks and issues have been identified through their processes.

The EMR CO has assessed the overall outcomes of the business separation monitoring to determine the level of compliance which has been achieved during the period as being:

“An effective compliance control framework is in place”.

Throughout the period NGET has been compliant with the relevant duties, except for two data incidents which have been investigated and are reported within section 4(c) below.

a) Objectives

NGET has taken steps to ensure that, in carrying out the EMR Functions

- no unfair commercial advantage has arisen to any of NGET’s businesses (including the NGET TO) or any business of any Associate of NGET;
- The EMR Functions have not been unduly influenced by any of NGET’s businesses (including the NGET TO) or any business of any Associate of NGET.

NGET has efficiently and effectively carried out the EMR Functions during the Period against the principles of best regulatory practice.

NGET’s organisational design gave clear role accountability and boundaries through separation of the System Operator (“SO”) function from the Transmission Owner (“TO”) function, each of which had separate lead directors. There were robust governance arrangements in place, including separate executive committees for the SO and the TO, which were responsible for managing the affairs of each business.

In accordance with the licence requirements of Special Condition 2N, a Single Responsible Director for EMR was appointed and was responsible for the EMR teams within the System Operation directorate of NGET SO. NGET operated and complied with all the legislation, licence, regulations, rules and codes applicable to NGET in carrying out the EMR Functions and has an open and positive relationship with Ofgem, BEIS and other industry stakeholders.

NGET is a separate legal entity from the ROCB and all commercial arrangements with ROCB are entered on an arm’s length basis and normal commercial terms (“ALBNCT”). Pricing of services between NGET and affiliates is on a fully absorbed cost basis in line with a formal National Grid policy. Where appropriate, separate lawyers are assigned to take instructions from and act on behalf of the NGET and ROCB respectively. This approach is taken to ensure that any conflict of interest is avoided and ALBNCT arrangements are negotiated and observed.

A Code of Conduct was in place which applied to the EMR teams and had provisions within it prohibiting members of the EMR Administrative Team (“EMRAT”) and EMR Data Handling Team (“EMRDHT”) teams from taking decisions which would unduly discriminate in favour of any NGET business or affiliate. The EMR CO is responsible for promoting a culture of compliance across the whole of National Grid and works with Licence Advisers in NGET and other National Grid businesses to educate, impart knowledge and share best practice on compliance matters.

b) *Legal and functional separation of NGET and relevant other competitive businesses*

To test the effectiveness of controls in place to ensure that there is legal and functional separation of NGET and ROCB, the EMR CO has reviewed business separation frameworks with the relevant directorates and has asked targeted questions to Finance, Treasury and Company Secretariat. The following arrangements remain in place to ensure that the NGET business (including those that were discharging EMR Functions) are carried out separately from the ROCB:

- NGET remains a separate legal entity from the ROCB as set out within the Company Structure Chart within Appendix Two of the EMR compliance statement. The Board of Directors of NGET are separate to those of the ROCB (see section 7 below)
- NGET continues to have separate statutory accounts which are subject to relevant accounting standards, which underpin separation of function, costs and revenues.
- NGET does not hold any investments or shares in the ROCB directly or indirectly, so does not have an entitlement to vote at the general meetings of any of the ROCB
- For services, which are not covered by licence formula or industry charging statements, NGET has a Governance Policy for the Pricing of Intra business and Third Party Services. The policy is in place to secure that consistent pricing is applied for services provided to group companies and third parties. It is published on the Compliance Officer's intranet website and is promoted through the network of Licence Advisors
- NGET does not conduct or carry out any activity other than the Transmission Business or other de minimis activities (each as defined in the NGET licence) or activities to which the Authority has given its consent in writing.
- NGET employees engaged in the management and operation of NGET (up to and including Senior Managers reporting to the NGET Board) are not simultaneously engaged in the management and operation of the ROCB, other than for the provision of Shared Services as set out within Appendix 1 of the EMR compliance statement and for services which constitute de minimis activities (see section 6 below).
- Buildings and Access Controls are in place and employees of NGET are employed in separate premises, to those employees of the ROCB. Employees involved in the EMRAT were assigned a secure access controlled area separated from other NGET employees, which was closely monitored and controlled by the EMRAT management team. Employees who visit premises which are not their normal place of work are treated as visitors in line with National Grid policy.

c) *EMR Data Handling Team*

To test the effectiveness of controls in place regarding the EMRDHT, the EMR CO has reviewed business separation frameworks with the relevant directorates and has asked targeted questions to the EMRDHT. The following arrangements were in place to ensure that the team had been set up and was operated, supervised and managed in a manner compliant with Special Condition 2N.

All members of EMRDHT, including new starters, have signed a confidentiality undertaking (non-disclosure agreement). The EMRDHT has also put in place appropriate systems and procedures for the storage, anonymisation and control of CEMRI. All CEMRI information was held on secure National Grid servers, with only EMRDHT members having access. The EMRDHT operated to a management procedure to ensure that all CEMRI data was anonymised before it was presented to any person who was not a member of the EMRDHT and only provided if it was for a permitted purpose as set out within Special Condition 2N.6A, 12, 13 and 13A. This procedure ensured that

there was a multiple step verification process, with one team member extracting the data and another team member checking and approving the data.

The EMRDHT had put in place and will continue to maintain document and information security policies for the receipt of CEMRI. If requested to run a future Call for Evidence (“CfE”), an IS system to manage CfE will be set up. This will be a secure password protected web portal for the recording, processing and storage of CEMRI. Functionality will be put in place by National Grid IS to ensure that only members of the EMRDHT have access to the CfE information.

d) *EMR Administrative Team*

To test the effectiveness of controls in place regarding the EMRAT, the EMR CO has reviewed business separation frameworks with the relevant directorates and has asked targeted questions to the EMRAT. The following arrangements remained in place to ensure that the team had been set up and was operated, supervised and managed in a manner compliant with Special Condition 2N.

All members of EMRAT, including new starters, have signed a confidentiality undertaking (non-disclosure agreement). Members of the EMRAT were only engaged in EMRAT functions and no other activities of NGET, except for activities which were part of their role as an NGET Manager or employee, such as attendance at management meetings, companywide improvement initiatives, and training courses.

The accommodation of the EMRAT was effective in restricting access by persons who are not members of the EMRAT. The EMRAT was in a dedicated secure office, which has swipe card access to restrict access so that only EMRAT members may enter.

The EMRAT had also put in place appropriate systems and procedures for the storage, anonymisation and control of CEMRAI. All CEMRAI information was held on secure National Grid servers, with only EMRAT members and members of the EMR IS project team having access. The EMRAT operated to a management procedure to ensure that all CEMRAI data was anonymised before it was presented to any person who was not a member of the EMRAT and only provided if it was for a permitted purpose as set out within Special Condition 2N.8A, 12, 13 and 13A. This procedure ensured that there was a multiple step verification process, with one team member extracting the data and another team member checking and approving the data.

The EMRAT had detailed on-boarding and off-boarding processes to ensure that control is maintained over physical access to the EMRAT office and access to CEMRI and CEMRAI through information systems.

Capacity Mechanism

The EMRAT had established document and IS security policies for the receipt of CEMRI in relation to the capacity mechanism. During the Period, systems were used to enable industry participants to submit pre-qualification data and documents.

The system was provided on a platform which allows applicants to submit data in to a secure area on the system to be reviewed and processed by EMRAT under the requirements of the Capacity

Market Rules. The system was a fully developed solution which restricts access to CEMRI and CEMRAI to the information owners and the relevant EMRAT members.

In accordance with the approved Capacity Market (CM) Rules and timetable, results of the pre-qualification process were published into the public domain in October 2018.

Contracts for Difference

During the period, NGET established and followed document and information security policies for the receipt of CEMRI for Contracts for Difference (“CfD”). During the Period, systems were used to enable industry participants to submit registration data and documents.

The system was provided on a platform which allows applicants to submit data in to a secure area on the system to be reviewed and processed by EMRAT. The system was a fully developed solution which restricts access to CEMRI and CEMRAI to the information owners and the relevant EMRAT members.

Restricted access to the system is available for Ofgem, BEIS and the Low Carbon Contracts Company so that these delivery partners can engage with various aspects of the CfD Round as required under the CfD Regulations.

e) *Restriction on the use of Confidential EMR Information*

Both the EMRAT and the EMRDHT teams used all reasonable endeavours to manage the process for the storage, anonymisation and control of CEMRI to persons whom are not members of either team and ensure that it is not possible to identify the generation set or the owner or operator, which is the subject of that CEMRI. There were appropriate systems and procedures for the storage, anonymisation and control of CEMRI.

A register was kept to record where CEMRI was disclosed to Shared Services personnel, other employees, external contractors, agents and advisers in order to carry out their functions or in order to enable NGET to perform its EMR Functions. Recipients of CEMRI understood the restrictions that apply and signed a confidentiality acknowledgement as required by Special Condition 2N.13(b)(ii). The register was known as the Confidential EMR Disclosure list and is maintained within the EMRAT team by the Stakeholder and Support Manager and within the EMRDHT by the EMR Modelling Manager.

3. EMR Compliance Statement

The Compliance Statement continued to be an accurate reflection of the compliance arrangements in place until 31st March 2019. NGENSO have ongoing responsibility for updating and publishing the document.

4. Duties and tasks of the EMR Compliance Officer

a) *Provision of advice and Information*

The EMR CO has fostered a culture of compliance within NGET during the period by completing the following activities:

- The EMR CO has provided advice to NGET Directors, Managers and other personnel in respect of the relevant duties.
- The EMR CO has delivered targeted briefings to the EMRAT and EMRDHT teams to explain the restrictions on sharing of CEMRI data and to reinforce the Code of Conduct.
- The EMR CO has also provided communications to the wider NGET and ROCB businesses so that these employees are aware of the restrictions in sharing and receiving EMR related data and to ensure that these functions do not receive an unfair commercial advantage.
- The EMR CO has implemented a companywide communications programme to ensure awareness of the EMR functions and the sensitivities surrounding the use and management of CEMRI. Bulletins and other communication materials have been produced for team meetings and published on the National Grid's internal intranet system.
- There is also a network of Licence Advisers in place who promote awareness of licence obligations, promote a culture of compliance and facilitate compliance monitoring within their functions. The Licence Advisers within the System Operation function ensure compliance with EMR related obligations. Workshops have also been held with the EMR CO's team and Licence Advisers to ensure consistent interpretation of information sharing restrictions and to identify compliance best practice.
- All National Grid employees in relevant roles and within the EMR teams are required to complete periodic e-learning training courses on Business Separation and Competition Law, which include modules on information sharing restrictions.

b) Monitoring

The EMR CO has undertaken monitoring during the period to assess the effectiveness of the practices, procedures and systems to ensure that NGET remained compliant with the EMR Relevant Duties.

Each directorate has in place a Business Separation Framework which is a framework based on a set of targeted questions and designed to ensure that all business functions remain compliant with the relevant licence obligations. The Business Separation Framework for System Operation included the relevant obligations for EMR and they have built the necessary controls into their framework.

As part of the monitoring process, the effectiveness of the controls are tested and reviewed and risks identified where appropriate. Each Licence Adviser has submitted their framework to the EMR CO who has conducted challenge and review sessions to discuss the robustness of the controls in place. The EMR CO has also liaised with the wider National Grid Risk, Audit and Compliance teams to verify the outputs.

c) Investigations Conducted

NGET has not received any complaints, as set out in paragraph 23 of Special Condition 2N, during the Period. In conjunction with EMRAT, the EMR CO has conducted two investigations relating to two data incidents during the Period as follows.

In October 2018, during the process of releasing the Capacity Market Prequalification results, an IT system issue with the EMR Delivery Body Portal (Portal) resulted in CEMRI¹ being inadvertently shared with the wrong Applicants. Ofgem were notified and a full investigation was carried out by the EMR CO, with a final report and an update on actions being sent to Ofgem on 28th February 2019.

In January 2019, EMRAT uploaded a file containing CEMRI to the EMR Delivery Body website instead of the Capacity Market Register. The incident was self-detected by EMRAT and immediate steps were taken to remove the report from the website and this was completed within 15 minutes, with confirmation that during this time the data had only been accessed by EMRAT and not any third party.

Ofgem were notified and following this incident, NGET completed an investigation, led by the EMR CO, to review the practices, procedures and systems that NGET has in place to ensure compliance with Special Condition 2N and to assess the appropriateness of such practices, procedures and systems for securing compliance with NGET's obligations under this condition and to provide a report.

The report noted a strong compliance culture, controls which are regularly reviewed and that practices, processes and procedures were sufficient. The review identified scope to improve in some areas and an action plan was implemented. Opportunities for further improvements are being considered, relating to system enhancements such as automation and a second stage approval process and review of all local working instructions to reduce compliance risk. Oversight for delivery of actions and engagement with Ofgem was transferred to NGESO with effect from 1st April 2019. NGET has been advised by NGESO that a copy of the EMR COs report was sent to Ofgem on 12 April 2019 and EMRAT are now awaiting Ofgem's further views, whereupon further actions will be agreed as appropriate.

d) Report to the single responsible director and the Compliance Committee by the EMR CO

The EMR CO has made a report to the Single Responsible Director and the NGET Compliance Committee twice during the reporting period in June and November 2018.

5. Certificate of Compliance

The NGET Certificate of Compliance in respect of Special Condition 2N Electricity Market Reform was approved by a resolution of the Board of Directors of NGET for signature by the Single Responsible Director on 21st June 2019. A copy of the signed certificate is attached at Appendix 1 of this report.

6. De Minimis Services

The de minimis services which NGET has provided to the ROCB during the period are as follows.

- Services provided by Commercial Engineering Services ("CES") relating to land fees, Wayleaves, and security services.

¹ information disclosed was a company name and a Capacity Market Unit ID (CMU). In addition, for 1 of the companies the notification also disclosed that the company had 'Conditionally Prequalified' for the Capacity Market Auction and that conditionality was due to planning consents being deferred

- IS services not covered by the regulatory consent for the provision of Common Services.

7. Boards of Directors for NGET and ROCB

The Directors for the Boards of NGET and ROCB for the period are shown in Appendix 2.

8. Minimum Posting Periods

Details of all employees who have moved into or out of the EMRAT and EMRDHT teams have been referred to the EMR CO. Employees moving into the teams have signed the Confidentiality Undertaking, received a briefing on the EMR Code of Conduct and been trained on the processes in place to manage CEMRI. Employees moving out of the teams have been reviewed by the EMR CO in accordance with the EMR compliance statement and the EMR CO has provided exit briefings and reminded them of their obligations under the terms of the Confidentiality Undertaking and contract of employment.

All employee transfers for the EMR Administration Team have been in accordance with the minimum posting periods set out in Appendix 8 of the EMR compliance statement. There have been no exceptions during the Period.

9. Further Information

Any enquiries regarding the content of this report should be addressed in the first instance to the EMR Compliance Officer at the following address:

EMR Compliance Officer
National Grid Electricity Transmission plc
Legal Department
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Appendix 1 – NGET Certificate of Compliance in respect of separation between NGET (EMR Functions) and Relevant Other Competitive Businesses and EMR ring fence

Special Condition 2N

National Grid Electricity Transmission plc

Certificate of Compliance

**in respect of Special Condition 2N Electricity Market Reform
for the period 1st May 2018 to 31st March 2019**

Capitalised terms have the meanings given to them in the NGET Licence.

I hereby certify on behalf of NGET, that to the best of my knowledge, information and belief having made due and careful enquiry, the report of the EMR Compliance Officer fairly represents the licensee's compliance with the EMR Relevant Duties.

Signature

Duncan Burt, Single Responsible Director in respect of Compliance with the EMR Relevant Duties

Date

Approved by a resolution of the NGET Board members on 21st June 2019

Appendix 2 – Directors of NGET and Relevant Other Competitive Businesses

| Company | Name | Title | Appointed | Resigned |
|---|---------------------|--|------------|------------|
| National Grid Electricity Transmission plc | David Wright | Director Electricity Transmission Owner and Group Electricity Chief Engineer | 01.10.2014 | |
| | Clive Elphick | Sufficiently Independent Director | 01.04.2014 | |
| | Catherine Bell | Sufficiently Independent Director | 01.04.2014 | |
| | Alan Foster | UK, Chief Finance Officer | 01.01.2016 | |
| | Christopher Bennett | Director, UK Regulation | 25.06.2016 | |
| | Nicola Shaw | Executive Director, UK | 27.07.2016 | |
| | Lawrence Hagan | Assistant Company Secretary | 07.02.2018 | |
| | Alexandra Lewis | Group Treasurer | 13.04.2018 | |
| | Derek Goodban | UK General Counsel and Company Secretary | 07.02.2019 | |
| | Fintan Slye | Director, UK System Operator | 07.02.2018 | 31.03.2019 |
| National Grid Interconnectors Limited | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 01.03.2015 | |
| | Hooper, Nick | Chief Finance Officer, National Grid Ventures | 01.03.2015 | |
| | Nick Sides | Head of Operations, Global Transmission | 01.03.2015 | |
| | Aarti Singhal | Director, Investor Relations | 14.06.2016 | |
| | Lawrence Hagan | Assistant Company Secretary | 25.09.2017 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | Alice Parker | Assistant Company Secretary | 01.03.2016 | 30.11.2018 |
| National Grid Interconnector Holdings Limited | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 01.03.2015 | |
| | Nick Sides | Head of Operations, Global Transmission | 01.03.2015 | |
| | Lawrence Hagan | Assistant Company Secretary | 14.09.2017 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | Nick Hooper | Chief Finance Officer, National Grid Ventures | 07.01.2019 | |
| | Zac Richardson | Head of Business Development, National Grid Ventures | 07.01.2019 | |
| | Aarti Singhal | Director, Investor Relations | 07.01.2019 | |
| | Martin Cook | Head of EV Development | 27.04.2016 | 07.01.2019 |

| | | | | |
|--------------------------------|-------------------|--|------------|------------|
| | Terence McCormick | Head of Corporate Development and Markets | 27.04.2016 | 07.01.2019 |
| | Alice Parker | Assistant Company Secretary | 24.05.2016 | 30.11.2018 |
| | | | | |
| Britned Development Limited | Alexander Hartman | Director, Britned Development Ltd | 01.01.2004 | |
| | Guido Fricke | Director, Britned Development Ltd | 02.11.2011 | |
| | Nick Sides | Head of Operations, Global Transmission | 01.04.2015 | |
| | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 17.07.2015 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | David Whincup | Assistant Company Secretary | 10.05.2016 | 13.07.2018 |
| | Alice Parker | Assistant Company Secretary | 10.05.2016 | 30.11.2018 |
| | | | | |
| National Grid Carbon Limited | Martin Cook | Head of EV Development | 01.12.2015 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | David Whincup | Assistant Company Secretary | 10.09.2014 | 13.07.2018 |
| | Alice Parker | Assistant Company Secretary | 15.12.2016 | 30.11.2018 |
| | | | | |
| National Grid Offshore Limited | Martin Cook | Head of EV Development | 01.12.2015 | |
| | Terence McCormick | Head of Corporate Development and Markets | 27.04.2016 | |
| | Zac Richardson | Head of Business Development, National Grid Ventures | 01.05.2016 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | David Whincup | Assistant Company Secretary | 24.03.2016 | 13.07.2018 |
| | Alice Parker | Assistant Company Secretary | 24.03.2016 | 30.11.2018 |
| | | | | |
| Nemo Link Limited | Markus Berger | Elia appointment | 27.02.2015 | |
| | Ilse Tant | Elia appointment | 27.02.2015 | |
| | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 27.02.2015 | |
| | Nick Hooper | Chief Finance Officer, National Grid Ventures | 21.09.2015 | |
| | Lawrence Hagan | Assistant Company Secretary | 23.08.2017 | |
| | Patrick De Leener | Elia appointment | 26.10.2017 | |
| | Nick Sides | Head of Operations, Global Transmission | 25.07.2018 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |

| | | | | |
|--------------------------------------|-----------------|---|------------|------------|
| | John Flynn | President & COO, Renewables & Storage, National Grid Ventures | 30.06.2017 | 25.07.2018 |
| | Alice Parker | Assistant Company Secretary | 01.03.2016 | 30.11.2018 |
| | | | | |
| National Grid IFA 2 Limited | Nick Sides | Head of Operations, Global Transmission | 01.04.2015 | |
| | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 20.09.2017 | |
| | Nick Hooper | Chief Finance Officer, National Grid Ventures | 20.09.2017 | |
| | Aarti Singhal | Director, Investor Relations | 20.09.2017 | |
| | Lawrence Hagan | Assistant Company Secretary | 25.09.2017 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | Zac Richardson | Head of Business Development, National Grid Ventures | 07.01.2019 | |
| | Alice Parker | Assistant Company Secretary | 20.10.2016 | 30.11.2018 |
| | | | | |
| National Grid North Sea Link Limited | Jon Butterworth | President & Chief Operating Officer, Global Transmission, National Grid Ventures | 23.03.2015 | |
| | Nick Hooper | Chief Finance Officer, National Grid Ventures | 01.12.2015 | |
| | Nick Sides | Head of Operations, Global Transmission | 20.09.2017 | |
| | Aarti Singhal | Director, Investor Relations | 20.09.2017 | |
| | Lawrence Hagan | Assistant Company Secretary | 25.09.2017 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | Zac Richardson | Head of Business Development, National Grid Ventures | 07.01.2019 | |
| | Alice Parker | Assistant Company Secretary | 15.12.2016 | 30.11.2018 |
| | | | | |
| National Grid Viking Link Limited | Andrew McIntosh | Head of Commercial Development | 27.04.2016 | |
| | Zac Richardson | Head of Business Development, National Grid Ventures | 01.05.2016 | |
| | Lawrence Hagan | Assistant Company Secretary | 01.09.2017 | |
| | Megan Barnes | Senior Assistant Company Secretary | 30.11.2018 | |
| | Alice Parker | Assistant Company Secretary | 17.10.2016 | 30.11.2018 |