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Dear Sally,

**Approval of the modified Access Rules and Charging Methodology for the Viking Link interconnector pursuant to Standard Licence Condition 11A and 10 of the Electricity Interconnector Licence**

On 16 March 2026, National Grid Viking Link Ltd ("Viking Link") submitted modified Access Rules and Charging Methodology for the Viking Link interconnector<sup>1</sup> to the Authority<sup>2</sup> for approval.

The modified Access Rules and Charging Methodology were submitted pursuant to Standard Licence Condition (SLC) 11A and 10 of Viking Link's Electricity Interconnector Licence (the Licence)<sup>3</sup>, which requires Viking Link to maintain 'Access Rules', that set out the terms and conditions for access to, and including use of, the interconnector.

We have decided to approve the modified Access Rules and Charging Methodology on the basis that we are satisfied the modifications achieve the relevant objectives as required under the Licence<sup>4</sup>. This letter contains a Direction (attached as Annex 1 and Annex 2) approving the modified Access Rules and Charging Methodology.

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<sup>1</sup> Viking Link is a 1400 MW high voltage direct current (HVDC) interconnector, connecting the transmission systems of Great Britain (GB) and Denmark (DK).

<sup>2</sup> The Gas and Electricity Markets Authority. Ofgem is the Office of the Authority. The terms "Ofgem", "the Authority", "we" and "us" are used interchangeably in this letter.

<sup>3</sup> The "Electricity Interconnector Licence: Standard Conditions" can be found here: [Electricity licensing \(from October 2025\) - Publications - Ofgem Public Register](#)

<sup>4</sup> The relevant Access Rules objectives are set out in SLC 11A and 10 of the Licence and state that the Access Rules and Charging Methodology shall be transparent, objective, non-discriminatory and compliant with the Regulation (as amended following UK exit from the EU, as detailed below) and any relevant legally binding decision of the European Commission and/or the Agency.

## The proposed modifications to the Access Rules

The modified Access Rules look to further build upon the Viking Link Access Rules approved by Ofgem on 10 August 2023<sup>5</sup> by introducing the following amendments:

### 1. *Change to Intraday Nomination Gate closure timing*

- 1.1. Viking Link proposes to move the Intraday Nomination Gate closure time five minutes closer to delivery at hh:50. This is to provide more flexibility for customers to adjust their nominations in response to changes in market conditions.
- 1.2. This change will come into effect at a later date to the modified Access Rules themselves as it will be implemented as part of a wider nomination system update. This is currently planned for end of Q3 2026.

### 2. *More flexible requirements for transmission rights nomination*

- 2.1. The requirements currently set out in the Access Rules state that the nomination of transmission rights may only be made by the rights holder.
- 2.2. Viking Link proposes to allow for the transmission rights holder to appoint a nomination representative, which would allow a different person to nominate capacity on the behalf of the transmissions rights holder.

### 3. *Clarification to Intraday Curtailment*

- 3.1. Viking Link proposes to clarify that Intraday Curtailment will only occur in the event of force majeure<sup>6</sup>, removing TSOs ability to curtail intraday transmission rights due to unplanned outages prior to Nomination Gate Closure. Viking Link state that this clarification aligns with what operationally occurs in practice.

### 4. *General clarifications*

- 4.1. Following customer feedback and internal review, Viking Link have updated the Access Rules to provide further clarity on the following:
  - The definition of Deemed Metered Volume (DMV)
  - The reference point when calculating the Loss Factor (LF)
  - Clarity that the lowest value of Net Transfer Capacity (NTC) in an applicable hour will be used during a capacity shortage when applying curtailment

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<sup>5</sup> The decision letter on the Viking Link Access Rules, approved by Ofgem on 10 August 2023 can be accessed here: [Approval of Viking Link Access Rules and Charging Methodology.pdf](#)

<sup>6</sup> Force majeure is defined and governed in the Viking Link Access Rules (see in particular Rule 2 and Rule 85), with its application to curtailment of transmission rights set out in Chapter 9.

## 5. *Harmonised Allocation Rules 2024 and 2026*

- 5.1. Viking Link proposes to make changes to their Access Rules to align with relevant aspects of the Harmonised Allocation Rules (HAR) as introduced in the EU region in January 2024 and January 2026.

### **The proposed changes to the Charging Methodology**

6. In addition to the above changes proposed to the Access Rules, the below changes to the Charging Methodology have also been proposed. Viking Link states that the purpose of these proposed changes is to better achieve the relevant objectives of the Charging Methodology, particularly enhanced transparency.

- 6.1. Viking Link proposes to remove text that refers to the interconnector from before it came into commercial operation. This reflects that the Viking Link interconnector has become commercially operational and is a housekeeping change that enhances the accuracy of the document.
- 6.2. Change of reference of “NGESO” (National Grid Electricity System Operator) to NESO (National Energy System Operator). This is a housekeeping change that reflects the creation of NESO, replacing NGESO as System Operator.
- 6.3. Viking Link also proposes to update the email and postal address for customer queries and the insertion of a website link for planned Viking Link outages. These, again, are housekeeping changes intended to reflect operational changes and to facilitate communication between Viking Link and its stakeholders.

In accordance with the applicable legal and regulatory framework, NGV conducted a public consultation<sup>7</sup> on the Access Rules and Charging Methodology from 24 October 2025 to 21 November 2025.

NGV received one (1) written response on the modified Access Rules. The respondent overwhelmingly supported the proposed changes to the Access Rules, noting that they would lead to more streamlined, automated, and transparent processes across nominations, capacity handling, and settlement.

No feedback was received in response to the changes proposed to the Charging Methodology.

Viking Link are not proposing any further changes to their Access Rules and Charging Methodology based on the stakeholder feedback received.

#### 1. *Change to Intraday Nomination Gate closure timings*

- 1.1. The respondent supported moving the Intraday Nomination Gate closer to the hour.
- 1.2. The respondent also highlighted the importance of clear communication about when changes will be implemented and that changes should be communicated in a timely manner to enable market participants to adapt their operations.
- 1.3. In addition to responding to the above proposed changes, the respondent raised a concern regarding the day ahead nomination deadline.
- 1.4. The respondent highlighted that, presently, the Joint Allocation Office (JAO) publishes the auction results for the single day-ahead coupling (SDAC) at 11:55 GMT the day preceding delivery and that the Viking Link nomination deadline is only 35 minutes later at 12:30 GMT. This is a divergence from other interconnectors, such as IFA and IFA2, where the nomination deadline is set at 13:00 GMT.
- 1.5. The respondent stated that the 12:30 GMT nomination deadline can be difficult for market participants to meet, especially where there are delays to the publication of the SDAC results as extensions to the SDAC deadline are only known on short notice.
- 1.6. To mitigate this and to facilitate a smoother nomination process, the respondent suggested that the day-ahead nomination deadline on Viking Link be aligned with that of IFA and IFA2, changing it from 12:30 to 13:00 GMT in the context of the broader update to the nomination system coming at a later date.

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<sup>7</sup> NGV's public consultation on the 2026 modified Viking Link Access Rules can be found at: [Consultations | Viking Link](#)

- 1.7. NGV acknowledged the benefits of making such a change but explained that they are not able to facilitate this as Energinet, the Danish system operator, is bound by legal requirements for reassessment of capacity for the intraday timeframe within Single Intraday Coupling (SIDC).
  - 1.8. This reassessment must include information on the Viking Link day-ahead flow and the reassessment must also be ready for publication to the market at 13:00 GMT, conflicting with the new nomination deadline proposed by the respondent.
2. *More flexible requirements for transmission rights nomination*
- 2.1. The respondent supported the proposed changes, stating that these reduced barriers for access to the Viking Link interconnector to non-Danish and non-British participants via the introduction of nomination representatives.
  - 2.2. The respondent also supported increased flexibility in capacity nominations and the enabling of collaboration between market participants.
3. *Intraday Curtailment*
- 3.1. The respondent supported the clarification that intraday curtailment will only happen following a case of force majeure.
4. *General clarifications*
- 4.1. The respondent supported the clarifying changes proposed, highlighting the need for coherent rules.
5. *Harmonised Allocation Rules 2024 and 2026*
- 5.1. The respondent welcomed the clarifications and alignment with the newest HAR rules.

## Regulatory framework

SLC 11A and 10 of the Licence<sup>8</sup> introduce relevant objectives for the Access Rules and Charging Methodology, against which the Authority assesses the Access Rules and Charging Methodology and any proposed modifications. The relevant objectives are that the Access Rules and Charging Methodology shall be transparent, objective, non-discriminatory and compliant with Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast following the UK's exit from the EU) (the Electricity Regulation) and any relevant legally binding decision of the European Commission and/or the Agency for the Cooperation of Energy Regulators retained following the UK's exit from the EU.

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<sup>8</sup> The "Electricity Interconnector Licence: Standard Conditions" can be found here: [Electricity licensing \(from October 2025\) - Publications - Ofgem Public Register](#)

## **The Authority's Decision**

We have reviewed the modified Access Rules and Charging Methodology submitted to Ofgem on 16 March 2026 and have considered the responses to Viking Link's consultation. We have concluded that the proposed changes meet the relevant objectives of the Access Rules and Charging Methodology for the following reasons:

### *1. Change to Intraday Nomination Gate closure timing*

- 1.1. We consider this change to be in line with the Access Rules objectives. The scope and purpose of the changes are clear and apply to all market participants.
- 1.2. We also agree that this change is in the interests of market participants in providing increased flexibility by enabling earlier nomination and nomination closer to delivery. This will also enable participants to make more informed decisions, as nomination can take place closer to real time.

### *2. More flexible requirements for transmission rights nomination*

- 2.1. We consider this modification to be in line with Access Rules objectives. In particular, this change improves non-discrimination amongst market participants as it will enable access for a wider range of participants via a nomination representative.
- 2.2. Previously, the Access Rules only allowed transmission rights holders to nominate. This presented a barrier to access for participants outside of Denmark and Great Britain. We therefore consider this to be a positive change in line with the interest of the market and the wider Access Rules objectives.

### *3. Intraday curtailment*

- 3.1. We consider this modification to comply with the Access Rules objectives as it provides clarity of what happens operationally in practice. This improves the transparency of the Access Rules and improves the firmness of nominations of all participants.
- 3.2. We consider this to be beneficial as it improves firmness of capacity nominations by reducing the number of scenarios under which capacity may be curtailed.

### *4. General clarifications*

- 4.1. We consider that this modification aligns with the Access Rules objectives in that they provide necessary updates to terminology and definitions used. This improves the transparency, accuracy, and accessibility of the Access Rules.

## 5. *Harmonised Allocation Rules 2024 and 2026*

- 5.1. We consider that this modification complies with the Access Rules objectives in that it ensures alignment with the latest HAR. This ensures the accuracy and transparency of the Access Rules for market participants

## 6. *Charging Methodology*

- 6.1. These modifications are general housekeeping changes that aim to ensure that user-facing information is accurate and up to date. We consider this to be beneficial change in line with the requirements set out under the license.

In making our decision we have also closely cooperated with the Danish Utility Regulator (DUR), to ensure we make consistent regulatory decisions.

The Authority approves the modified Access Rules and Charging Methodology on the basis that they meet the relevant objectives set out in SLC 11A(4) and 10(4) of the Licence.

The direction relating to the approval of the modified Access Rules and Charging Methodology, issued in accordance with SLC 11A(13) and 10(14) of the Licence, can be found in Annex 1 and Annex 2 of this letter.

### **Next steps**

#### *Publication of the modified Access Rules and Charging Methodology*

In accordance with SLC 11A(14) and 10(15) of the Licence, Viking Link is required to publish (at least on its website) the approved Access Rules and Charging Methodology for a period of 28 days prior to the Access Rules and Charging Methodology coming into effect (the Publication Period), unless the Authority directs otherwise.

Yours sincerely,

Mo Rahee

**Head of Electricity Interconnector Market Arrangements, Energy Systems Management & Security**

## ANNEX 1

### **Direction issued to National Grid Viking Link Ltd pursuant to paragraph 13 of Standard Licence Condition 11A (Approval of terms for access to the licensee's interconnector) of its Electricity Interconnector Licence**

1. This Direction is issued by the Gas and Electricity Markets Authority (the "Authority") pursuant to paragraph 13 of Standard Licence Condition 11A of the Electricity Interconnector Licence (the "Licence") granted or treated as granted under section 6(1)(e) of the Electricity Act 1989 (the "Act") to National Grid Viking Link Ltd (the "Licensee") in relation to the Viking Link interconnector.
2. Standard Licence Condition 11A, paragraph 4, requires that the Access Rules must be transparent, objective, non-discriminatory and compliant with the Regulation (Regulation (EU) 2019/943 on conditions for access to the network for cross border exchanges in electricity, as amended following the UK's exit from the EU) and any relevant legally binding decision of the European Commission and/or Agency for the Cooperation of Energy Regulators retained following the UK's exit from the EU (collectively "the relevant Access Rules objectives").
3. Standard Licence Condition 11A, paragraph 8, requires that the Licensee reviews its Access Rules at least once in each calendar year and makes such modifications to the Access Rules as may be requisite for the purpose of ensuring that the Access Rules better achieve the relevant Access Rules objectives.
4. Standard Licence Condition 11A, paragraph 10, requires the Licensee to take all reasonable steps to ensure that all persons, including those in Member States that may have a direct interest in the Access Rules, are consulted and allowed a period of not less than 28 days within which to make written representations. The Licensee must also furnish to the Authority a report setting out certain information, including the terms originally proposed for the modification, the representations, if any, made by interested persons and any change in the terms of the modification intended as a consequence of such representations.
5. In accordance with Standard Licence Condition 11A, paragraph 10, on 16 March 2026, the Licensee furnished the Authority with a report setting out the Licensee's proposed modifications to the Access Rules (the "modified Access Rules").

6. After careful consideration of the report and the responses to the public consultation and after consulting and closely cooperating with the Danish regulatory authority, the Authority has decided that the Licensee's proposed modified Access Rules meet the relevant Access Rules objectives for the reasons set out in the letter accompanying this Direction.
7. Standard Licence Condition 11A, paragraph 14 requires that, unless the Authority directs otherwise, the modified Access Rules shall be published 28 days prior to coming into effect. The Authority considers that it is important to ensure that the modified Access Rules come into effect as soon as possible on the basis of facilitating efficient cross border trade.
8. The Authority therefore hereby directs that:
  - a) pursuant to paragraph 13 of Standard Licence Condition 11A of the Licence, the Licensee's modified Access Rules are approved; and
  - b) pursuant to paragraph 14 of Standard Licence Condition 11A of the Licence, that the modified Access Rules come into effect when the Licensee publishes them on its website.
9. This Direction shall take effect immediately and shall remain in effect until such time as the Authority may revoke or vary the Direction in writing upon reasonable notice.
10. This Direction constitutes notice of the Authority's reasons for the decision pursuant to section 49A of the Act. Copies of the documents mentioned in this Direction can be found on the Ofgem website ([www.ofgem.gov.uk](http://www.ofgem.gov.uk)).

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Mo Rahee

**Head of Electricity Interconnector Market Arrangements, Energy Systems Management & Security**

**Signed on behalf of the Authority and authorised for that purpose by the Authority on 15 June 2026**

## ANNEX 2

### **Direction issued to National Grid Viking Link Ltd pursuant to paragraph 14 of Standard Licence Condition 10 (Charging Methodology to apply to third party access to the licensee's interconnector) of its Electricity Interconnector Licence**

11. This Direction is issued by the Gas and Electricity Markets Authority (the "Authority") pursuant to paragraph 14 of Standard Licence Condition 10 of the Electricity Interconnector Licence (the "Licence") granted or treated as granted under section 6(1)(e) of the Electricity Act 1989 (the "Act") to National Grid Viking Link Ltd (the "Licensee") in relation to the Viking Link interconnector.
12. Standard Licence Condition 10, paragraph 4, requires the Charging Methodology to be transparent, objective, non-discriminatory and compliant with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or Agency for the Co-operation of Energy Regulators (the relevant charging methodology criteria).
13. Standard Licence Condition 10, paragraph 11, requires the Licensee to take all reasonable steps to ensure that all persons, including those in other Member States that may have a direct interest in the Charging Methodology are consulted and allow them a period of not less than 28 days within which to make written representations. The Licensee must also furnish to the Authority a report setting out the terms originally proposed in the Charging Methodology, the representations, if any, made by interested persons and any change in the terms of the Charging Methodology intended as a consequence of such representations.
14. In accordance with Standard Licence Condition 10, paragraph 11, on 16 March 2026, the Licensee furnished the Authority with a report setting out the Licensee's proposed modifications to the Charging Methodology (the "modified Charging Methodology").
15. After careful consideration of the report and the responses to the public consultation and after consulting and closely cooperating with the Danish regulatory authority, the Authority has decided that the Licensee's proposed modified Charging Methodology meets the relevant objectives for the reasons set out in the letter accompanying this Direction.
16. Standard Licence Condition 10, paragraph 15 requires that, unless the Authority directs otherwise, the modified Charging Methodology shall be published 28 days prior to coming into effect. The Authority considers that it is important to ensure that the modified Charging Methodology comes into effect as soon as possible on the basis of facilitating efficient cross border trade.

17. The Authority therefore hereby directs that:

- a) pursuant to paragraph 14 of Standard Licence Condition 10 of the Licence, the Licensee's modified Charging Methodology is approved; and
- b) pursuant to paragraph 15 of Standard Licence Condition 10 of the Licence, that the modified Charging Methodology comes into effect when the Licensee publishes them on its website.

18. This Direction shall take effect immediately and shall remain in effect until such time as the Authority may revoke or vary the Direction in writing upon reasonable notice.

19. This Direction constitutes notice of the Authority's reasons for the decision pursuant to section 49A of the Act. Copies of the documents mentioned in this Direction can be found on the Ofgem website ([www.ofgem.gov.uk](http://www.ofgem.gov.uk)).

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Mo Rahee

**Head of Electricity Interconnector Market Arrangements, Energy Systems Management & Security**

**Signed on behalf of the Authority and authorised for that purpose by the Authority on 15 June 2026**