

Dear CCL and REGO team,

We'd like to take this opportunity to submit further comments after attending the GoO recognition and market coupling workshop on Monday 7<sup>th</sup> March, in particular around the specific evidential requirements of proof of flow under implicit trading.

In the presentation used for the workshop (specifically slide 21) it says about the evidence that may be used to prove GB supply or consumption of overseas electricity under implicit trading:

- Evidence of sale / purchase on coupled market:
  - Evidence of implicit sale or renewable on a power exchange within a coupled market country
  - Evidence of implicit purchase amount of electricity by a supplier on a power exchange in the UK *in the same time period (e.g. half hour)*

We have strong concerns about being able to provide evidence for a half hourly time period and would suggest that it would make more sense, and less administrative burden, to make the time period monthly in line with the fact that GoOs are allocated monthly.

If you could confirm safe receipt of this email I would be grateful.

Kind regards

Gemma Newsham



**Gemma Newsham**

Head of Regulations

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