

John Greasley
Regulation and Stakeholder Manager, Interconnectors
National Grid Ventures

For the attention of: Heather Stewart

European Coordination Systems & Networks
Ofgem
10 South Colonnade
London E14 4PU

15 February 2019

Dear Heather,

Preparing for EU Exit: statutory consultation on consequential licence modifications in the event the UK leaves the EU without a deal

Thank you for the opportunity to respond to the above statutory consultation. As of February 2019, National Grid Ventures has an interest in three operational electricity interconnectors with EU Member States, with a further three under development to EU or EEA Member States. Formally this response is on behalf of National Grid Interconnectors (representing our interests in IFA, North Sea Link, IFA2 and Viking Link).

We welcome Ofgem's continued efforts to ensure that the GB regulatory regime for interconnectors remains fit for purpose in the event the UK leaves the EU without a deal. We responded to the February 2018 consultation on this topic, stating our agreement with the interconnector licence conditions identified by Ofgem as potentially requiring change.

With regards to the current consultation, our view is that the proposed licence modifications are both consistent with the provisions in the Statutory Instruments that have been prepared under the European Union (Withdrawal) Act 2018 and achieve the aim of ensuring that the licence conditions function effectively if the UK leaves the EU without a deal.

Ofgem has stated in the consultation its intention of making the proposed licence modifications only in the event the UK leaves the EU without a deal. As Ofgem has acknowledged, the timescales associated with the licence modification process might result in an interregnum period – a period between exit day and the licence changes taking effect – which will be longer the later a licence modification direction is issued.

In order to minimise the potential interregnum period and the uncertainty associated with it, we suggest that Ofgem considers whether it is appropriate to issue a licence modification

direction at the earliest possible date and then revoke it during the standstill period of the licence modifications, should the licence modifications prove unnecessary.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'J. Greasley', written in a cursive style.

John Greasley
Regulation and Stakeholder Manager, Interconnectors
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