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3 August 2021

Dear Sir/Madam,

**Aquind Limited and Aquind SAS response to the public consultation on "FR-UK Long Term capacity Calculation - NTC Interim Solution".**

Aquind Limited (UK) and Aquind SAS (France) ("Aquind") are developers of the GB – France interconnector, called Aquind Interconnector. Aquind Limited and RTE have signed PTF dated 06 March 2017 for connection of 2GW of additional GB – France interconnection capacity at Barnabos switching station.

Aquind welcomes an opportunity to respond to the consultation on "FR-UK Long Term capacity Calculation - NTC Interim Solution". Aquind acknowledges the temporary nature of the proposed methodology and that by the time of commissioning of Aquind Interconnector a permanent long-term common capacity calculation methodology is likely to be agreed in accordance with Article 311 (previously ENER 13) of the EU/UK Trade and Cooperation Agreement ("TCA"). Nevertheless, Aquind would like to make several remarks which it hopes RTE may find helpful.

Long-term capacity calculations process

Aquind is unclear why the results of NTC calculation at September Y-1 cannot be a Minimal Guaranteed Value (MGV) if such NTC is higher than the value calculated at February Y-1.

Another calculation at December Y-1 would also be helpful considering RTE by that time will have more certainty regarding upcoming outages.

Aquind is also concerned with the timing of Monthly and Weekly capacity calculations at M-1 and W-1 respectively. If such calculations are undertaken at the very end of each month and week, efficient capacity auctions for the respective products may not be possible due to the time constraints associated with setting up an auction. This would also be to the detriment of the market participants and may result in less-than-optimal utilisation of interconnection capacity.

Scenarios definition methodology

It is not clear from the proposed methodology what would be the parameters of such scenarios.

RTE should make sure that these scenarios and all underlying assumptions are made available to all GB - French interconnectors for consultation prior to their adaptation.

AQUIND SAS est une société de droit français enregistrée sous le numéro R.C.S 808 503 940, dont le siège est sis 72 rue de Lessard à Rouen (76100).
AQUIND Limited est une société enregistrée en Angleterre et au Pays de Galles sous le numéro 06681477, dont le siège est sis 5 Stratford Place, London, England, W1C 1AX.

Hypothesis used in the Long term capacity calculation methodology « NTC Interim »

While Aquind acknowledges that due to the interim nature of the proposed methodology the current hypothesis is proposed only for the operational and under construction interconnectors, Aquind would welcome initial discussions with RTE regarding the potential import and export calculation hypothesis for Aquind Interconnector, considering an interface with the IFA2 Area of Influence.

Yours sincerely,

Kirill Glukhovskoy

Managing Director, Aquind Limited