

1. Austria

Key features

<i>Name of balancing zone(s)</i>	Market Area East ¹
<i>Distribution system part of balancing zone</i>	Yes
<i>Hub name (trading platform)</i>	EEX CEGH (Central European Gas Hub) Gas Exchange
<i>VTP name</i>	CEGH VTP
<i>Implementation date of BAL NC</i>	October 2015
<i>Balancing responsible (Art. 4.4)</i>	The Market Area Manager in the Market Area East is AGGM Austrian Gas Grid Management AG, the Clearing Entity is AGCS Austrian Gas Clearing and Settlement AG.
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8 of BAL NC) (Art 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	Implemented (portfolio balancing) Within-day obligations only apply on days during which the Market and Distribution Area Manager had to purchase both positive and negative balancing energy for Balance Groups, which are imbalanced and which are beyond the tolerances ² .
<i>Incentives (Art. 11)</i>	No incentives according to Art 11 BAL NC.
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented The methodology is defined in the sections 21 to 29 and 40 in the respective ordinance .

¹ In Austria, there are three market areas (Market Area East, Tyrol and Vorarlberg). However, the market areas Tyrol and Vorarlberg have no transmission network operators, and TSOs with an entry-exit system are only available in Market Area East.

² More detailed information can be found in § 23 of the [Austrian Gas Market Model Ordinance](#).

Neutrality Arrangements (Art. 29-31)	Implemented The Clearing Entity in the Market Area East is "AGCS Austrian Gas Clearing and Settlement AG" and publishes the neutrality charge account under https://www.agcs.at/daten-preise#Umlagekonto .
Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): The MAM publishes a yearly Balancing report on their website: https://www.aggm.at/en/downloads/reports/ Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.agcs.at/daten-preise#Umlagekonto Report on the accuracy of the forecast of a network user's NDM off-takes (Art.42.3): https://www.aggm.at/en/downloads/reports/

Main updates implemented in GY 2023/24 - GY 2024/25

2. Belgium & Luxembourg

Key features

Name of balancing zone(s)	BeLux-H
Distribution system part of balancing zone	Yes
Hub name (trading platform)	EEX
VTP name	ZTP
Implementation date of BAL NC	October 2015
Balancing responsible (Art. 4.4 of BAL NC)	Balansys, responsible the commercial balancing (financial settlements).
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Fully implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	No
WDOs (Art. 24-28)	Yes (System wide according to art. 25(1) of BAL NC) During the gas day, as long as the market balancing position (aggregate of all the grid users' positions) remains within the predefined upper and lower market thresholds (within day obligation), there is no intervention by the balancing operator. All grid users receive on hourly basis information on the market balancing position and on their own balancing position together with forecasting data for the remaining hours of the day. In case the market balancing position goes beyond the upper (or lower) market threshold, the balancing operator instantly settles proportionally in respect of the grid user balancing position. The balancing operator initiates a sale (or purchase) transaction on the commodity market for the quantity of the market excess (or shortfall) and settles in cash that quantity with the grid user(s) contributing to such imbalance in proportion of their individual contribution. This transaction, once concluded, will set the reference price used at that time for refunding or charging

	network users who caused the market excess or shortfall hence reflecting the market value for that residual natural gas at that time. All grid users and the market position is settled to 0 at the end of each gas day. During the gas day, as long as the market balancing position (aggregate of all the grid users' positions) remains within the predefined upper and lower market thresholds (within day obligation), there is no intervention by the balancing operator. All grid users receive on hourly basis information on the market balancing position and on their own balancing position together with forecasting data for the remaining hours of the day. In case the market balancing position goes beyond the upper (or lower) market threshold, the balancing operator instantly settles proportionally in respect of the grid user balancing position.
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ³
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented All costs and revenues arising from daily and within-day imbalances positions and operational costs linked to the balancing activities of Balansys are passed on to network users. Given the fact that the flexibility made available to the market is mainly used by network users supplying domestic outputs (consumption within the BeLux zones), the neutrality charge is invoiced / credited on the basis of the provisional energy allocations to the level of domestic exits without distinction between the different types of consumers. Bank guarantee is applied as measure to mitigate possible default in payment by network users. In case of a default attributable to a network user, the exposure of a network user must be covered by a creditworthiness (bank guarantee or cash deposit) and have no possibility to trade anymore if his guarantee exceeds his exposure, to avoid payment default.
<i>Interim measures (Art. 45-50)</i>	No

³ Link to daily imbalance charge calculation methodology: <http://www.balansys.eu/contracts-tariffs/>

Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://gasdata.balansys.eu/SDP/Pages/Reports/BalancingInformation.aspx Publication of aggregate neutrality charges and balancing charges (art.29.4): http://www.balansys.eu/contracts-tariffs/ Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): A new report will be available soon and will be published on the Fluxys Belgium website (for GY 2023-24 and 2024-25)
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Main updates implemented in GY 2023/24 - GY 2024/25
The main update concerns the introduction, since January 1, 2024, of the concept of "main causer", in the sense that a network user is defined as a "main causer" if they use more than 20% of the flexibility offered to the market for their own needs in the event of an exit from within-day tolerance zones. A specific rate applies if the tolerance zones are exceeded. Conversely, other network users are considered "minor causers" and are no longer penalized by a small adjustment. Another major change concerns the end of the conversion from L-gas to H-gas in Belgium: all gas consumers have switched to H-gas since October 1, 2024, and therefore there is no longer an L-gas market in Belgium. The BeLux-L zone has thus ceased to exist since the end of the conversion.

3. Bulgaria

Key features

<i>Name of balancing zone(s)</i>	National Balancing Zone ICGB Balancing Zone
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	Balkan Gas Hub (BGH)/ Trayport Joule
<i>VTP name</i>	VTP Bulgaria VTP ICGB
<i>Implementation date of BAL NC</i>	Interim measures terminated (tolerances removed in 2019, interim imbalance charge in 2020). ICGB operates under the provisions of the BAL NC since the start of its commercial operation date which is October 1 st 2022.
<i>Balancing responsible (Art. 4.4)</i>	TSO – Bulgartransgaz TSO – ICGB
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented as of 1 January 2020
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ⁴⁵ For Bulgartransgaz, a public consultation was held on August 2023 to set parameters valid for GY 2023/24 used for the daily Imbalance and neutrality charge calculation methodology (Balancing Methodology) for GY 2023/24. The changes proposed regard a keeping the small adjustment applied to determine the applicable prices (value amounts to 8 %), clearing period for the neutrality account for balancing (keeping 6

⁴ [Link](#) to the approved daily imbalance charge calculation methodology of ICGB (Art. 20.2).

⁵ [Link](#) to the approved daily imbalance charge calculation methodology of Bulgartransgaz (Art. 20.2).

	months). The criteria's according art 25 of the Balancing Methodology are set to: Number of completed transactions - more than 2 (two) commercial transactions; Minimum total volume of executed transactions - 1 000 MWh for the reporting day. Bulgartransgaz informed that no opinions or comments were received from interested parties. The new parameter are applicable as of 1 October 2023.⁶ For ICGB, via a joint decision of the Energy Regulators of Greece and Bulgaria, the updated daily imbalance charge calculation methodology was approved 2022. The decision approved the small adjustment applied to determine the applicable prices (value amounts to 20 %). The Regulators determined that the daily imbalance charge calculation methodology is compliant with the neutrality account and balancing obligations set forth in EU Regulation № 312/2014.
Neutrality Arrangements (Art. 29-31)	Implemented Any costs and revenues arising from the following activity is passed on to network users: • revenues generated by the balancing activity, including revenues from the sale of natural gas surpluses, resulting from carrying out the activity over the period of consideration of clearing the neutrality account; • costs for carrying out the balancing activity carried out over the period of consideration of clearing the neutrality account, including: ○ costs for purchasing natural gas for physical balancing; ○ costs for purchasing natural gas for commercial balancing; ○ operational costs for carrying out the activity; ○ yearly depreciations of assets, with which the balancing activity is performed. A system of financial security safeguards has been established as measure to prevent risk of default payment of balancing charges from network users. In case the users and/or natural

⁶ [Link](#) to public consultation.

	gas traders fail to meet their obligations to manage their credit risk, the operator has the right to limit or terminate the provision of natural gas access and transport service to limit the financial losses generated by the balancing.
<i>Interim measures (Art. 45-50)</i>	Terminated ⁷
<i>Information provision (Art. 32-42)</i>	Bulgartransgaz Publication of balancing actions (Art. 9.4, Art. 32.2 and Art. 33.1(g)): https://www.bulgartransgaz.bg/files/useruploads/files/Balansirane/Balancing%20actions.xlsx Publication of aggregate neutrality charges and balancing charges (Art. 29.4): https://www.bulgartransgaz.bg/files/useruploads/files/prozrachnost-tarifi/TAR%20Period%202023_2024/Taksa%20neutralnost%20_en.pdf https://www.bulgartransgaz.bg/files/useruploads/files/Balansirane/Price_natural_gas_balancing.xlsx Report on the accuracy of the forecast of a network user's NDM off-takes (Art. 42.3): ICGB Publication of balancing actions (Art. 9.4, Art. 32.2 and Art. 33.1(g)): https://www.icgb.eu/transparency/operational-data/

Main updates implemented in GY 2023/24 - GY 2024/25

⁷ Tolerances removed in July 2019, interim imbalance charge and balancing service agreements removed once trading platform became operational as of 1 January 2020

4. Croatia

Key features

<i>Name of balancing zone(s)</i>	Croatia
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	HROTE Gas Trading Platform
<i>VTP name</i>	VTP
<i>Implementation date of BAL-NC</i>	October 2015
<i>Balancing responsible (Art. 4.4)</i>	TSO – Plinacro HROTE – Market operator (HROTE is operating virtual trading point and gas trading platform. HROTE is also responsible for all financial settlement related to balancing action and for neutrality accounting)
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented The daily imbalance quantity is determined by the difference between the amount of gas delivered to the transport system and the determined quantities of gas taken from the transmission system at the level of the gas day for each balance group, taking into account the accepted transactions at the virtual trading point, closed trading on trading platforms and activated balancing energy for the balancing service. Based on decision from the NRA, the price of locational products

	should be taken into account for the purpose of determining the marginal buy/sell price and the WAP. ⁸
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented Cost and Revenues to be passed on to network users (balance group responsible): The sum of all cash amounts deriving from the settlements of daily imbalance charges for the balance group, charges for trading on the trading platform with respect to the balancing actions of the transmission system operator and charges for activated balancing energy through the use of balancing services.⁹ In order to mitigate their default in payment of balancing charges by network users, bank guarantee and cash deposit are required. These are retained in case of default attributable to a network user.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.hrote.hr/balancing-energy-191 Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.hrote.hr/neutrality Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): Not available

Main updates implemented in GY 2023/24 - GY 2024/25

⁸ Link to the approved daily imbalance charge calculation methodology (art.20.2):
https://files.hrote.hr/files/PDF/SOOTP/POTP-finalna%20verzija_eng_web.pdf

⁹ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2).
https://narodne-novine.nn.hr/clanci/sluzbeni/2018_06_50_1007.html (Croatian only)

5. Czech Republic

Key features

<i>Name of balancing zone(s)</i>	Czech Republic
<i>Distribution system part of balancing zone</i>	Yes
<i>Hub name (trading platform)</i>	OTE
<i>VTP name</i>	CZVTP
<i>Implementation date of BAL NC</i>	October 2016
<i>Balancing responsible (Art. 4.4)</i>	TSO – Net4Gas OTE as a market operator organizes the trading platform (where among other trades balancing actions are performed) and also administers the financial settlement of imbalances
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	Procured via Public Tender procedure (Art.8.3), used in absence of liquidity of trade in STSPs. The service was procured for the calendar year 2019, however, was not used. ¹⁰
<i>Linepack Flexibility Service (Art. 43-44)</i>	Yes The LFS is used as flexibility tool to allow NUs to balance their position within a predefined flexibility bandwidth. No additional costs of offsetting gas imbalances are incurred unless these limits are exceeded. The LFS is provided free of charge to NUs that have a reserved capacity at IPs or at gas storage points (unless the allocation rule ensuring equality of nomination and allocation is applied at these points for the relevant gas day), and those NUs responsible for imbalances at specific points of delivery. Unused flexibility is traded on the organised market platform, so that NUs are incentivised to participate in the

¹⁰ Published information on balancing services according to art. 8.7:

https://www.net4gas.cz/files/informace-siti/informace-siti-new/cz/2019_n4g_vyuziti_vyrovnavaci_sluzby_cz.pdf

	unused flexibility market to prevent financial settlement of the daily imbalance quantities. If the cumulative daily imbalances exceed the flexibility limits, the imbalanced NUs will pay the applicable price for this imbalance exceeding the flexibility limit. ¹¹
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented According to article 21.2 of BAL NC, the imbalance quantity calculation takes into account the linepack flexibility service. Daily imbalance quantity is lowered by the individual daily amount of linepack flexibility allocated to a network user. ¹²
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented Balancing actions costs/revenues and daily imbalance charges are passed on to network users. By the end of the year the neutrality account is reset and the final balance is covered by price regulation (transmission tariff). No neutrality charges are involved in the process. OTE publishes information on the neutrality account. In order to mitigate possible default in payment by network users, the market operator (OTE) requires the system users to provide assurance, which is retained in case of default in payment.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)) : https://www.ote-cr.cz/en/statistics/gas-imbalance/balancing-actions?date=2021-12-01 Publication of aggregate neutrality charges and balancing charges (art.29.4):

¹¹ Link to the relevant documents that describe the offered linepack flexibility service:
https://www.eru.cz/documents/10540/5199106/PTP_Amended_2019_ENG.PDF/cf74079a-da87-431b-b4a0-ccce7039058a#page=82

¹² Link to the approved daily imbalance charge calculation methodology:
https://www.eru.cz/documents/10540/5199106/PTP_Amended_2019_ENG.PDF/cf74079a-da87-431b-b4a0-ccce7039058a#page=91.

[https://www.ote-cr.cz/en/statistics/gas-
imbalances/neutrality-charges-for-
balancing?set_language=en&date=2021-12-01](https://www.ote-cr.cz/en/statistics/gas-
imbalances/neutrality-charges-for-
balancing?set_language=en&date=2021-12-01)

**Report on the accuracy of the forecast of a network user's
NDM off-takes (art.42.3):**

[https://www.ote-cr.cz/en/statistics/gas-load-
profiles/temperature-and-recalculated-tdd-second-
update?date=2021-12-01](https://www.ote-cr.cz/en/statistics/gas-load-
profiles/temperature-and-recalculated-tdd-second-
update?date=2021-12-01)

Main updates implemented in GY 2023/24 - GY 2024/25

6. Denmark & Sweden

Key features

<i>Name of balancing zone(s)</i>	Joint Balancing Zone - Denmark and Sweden
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	EEX ETF
<i>VTP name</i>	ETF/GTF ¹³
<i>Implementation date of BAL NC</i>	Denmark implemented BAL NC in October 2015. Sweden applied interim measures until April 2019. Joint Balancing Zone operational since April 2019.
<i>Balancing responsible (Art. 4.4)</i>	TSO - Energinet
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	Yes
<i>Incentives (Art. 11)</i>	Yes
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented The daily imbalance charge methodology including within-day-obligations has been implemented in accordance with the BAL NC. A daily imbalance quantity is calculated for each network user (NU) for each gas day as result of deliveries – offtakes. To calculate daily imbalance charges for each NU, the NU's Daily Imbalance Quantity shall be multiplied by the applicable price, which is determined depending on whether the estimated imbalance and the calculated imbalance falls within the green zone (linepack calculated area of equilibrium) or yellow zone (linepack area outside the green zone),

¹³ ETF: trading point for Danish gas exchange, GTF: trading point for bilateral trades on secondary market

	and if the BAM has performed any balancing actions (yellow zone trades). ¹⁴
Neutrality Arrangements (Art. 29-31)	Partially implemented Costs and revenues arising from daily imbalance charges and from balancing actions are passed on to network users through the transmission tariffs, which is based on the network users' actual use of the system.¹⁵ There is no separate balancing neutrality charge. A general credit line has been implemented as measure to mitigate possible default in payment by network users. In the event of late payment of imbalance charges, Energinet is entitled to charge reminder fees and default interest. The default interest shall be calculated from and including the due date to and including the day on which payment is received, at an annual interest rate corresponding to the discount rate of Danmarks Nationalbank at any given time with an addition of 5 percentage points. Such reminder fees and default interest shall be invoiced separately and as soon as possible.
Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): ENERGI DATA SERVICE Publication of aggregate neutrality charges and balancing charges (art.29.4): https://en.energinet.dk/Gas/Tariffs-and-Fees/Current-tariffs Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): https://energinet.dk/Gas/Gasdata/Gasdata-i-loebet-af-doenet

Main updates implemented in GY 2023/24 - GY 2024/25

Energinet has implemented a new [Submission of Methodology Approval of Adjusted Commercial Balance Model](#)

¹⁴ Link to the approved daily imbalance charge calculation methodology (art.20.2):
<https://en.energinet.dk/Gas/Rules>

¹⁵ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):
<https://forsyningstilsynet.dk/gas/afgoerelser/energinetdk-s-kommercielle-balanceringsmodel>

7. Finland

Key features

<i>Name of balancing zone(s)</i>	Finland Gas Market Balance Area
<i>Distribution system part of balancing zone</i>	Yes
<i>Hub name (trading platform)</i>	GET Baltic
<i>VTP name</i>	VTP
<i>Implementation date of BAL NC</i>	1 January 2020
<i>Balancing responsible (Art. 4.4)</i>	TSO – Gasgrid
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	Yes
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ¹⁶ The daily imbalance charges are calculated for each balance group by multiplying the balance group's daily imbalance quantity by the applicable imbalance charge price. The daily imbalance quantity is based on the results of the final balance settlement. If the TSO has not traded on the gas exchange or placed within-day orders on balancing service agreements during the gas delivery date, the price of the daily imbalance charge fee for the balance group shall be the adjusted neutral gas price. If there are no any trades concluded at the gas exchange, the price defined in the balancing service agreement (concluded through public tender process) would be used.

¹⁶ Link to the approved daily imbalance charge calculation methodology (art.20.2): <https://gasgrid.fi/wp-content/uploads/Terms-and-conditions-of-balance-management-2.0-unofficial-english-translation.pdf>

<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented¹⁷ The following costs and revenues are passed on to network users: • paid and credited Imbalance Charges; • costs and revenues relating to balancing actions undertaken; • costs relating to balancing service agreements in force at that time; • development, investment and maintenance costs relating to balancing actions; • personnel costs relating to balancing actions; and • finance costs relating to balancing actions. The balance responsible party's monthly neutrality charge shall be determined by multiplying the amount of aggregate offtakes included during the gas month in the balance responsible party's balancing portfolio (incl. Exit Zone, Virtual Trading Point and Balticconnector) by the price of the neutrality charge applicable to that gas month. Creditworthiness requirements have been established to secure payment of imbalance charges.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): Gasgrid will develop further the balancing action publication site in early 2024. Publication of aggregate neutrality charges and balancing charges (art.29.4): https://gasgrid.fi/wp-content/uploads/Neutrality-charge-unit-prices-11.pdf Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3):

¹⁷ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2): <https://gasgrid.fi/wp-content/uploads/Terms-and-conditions-of-balance-management-2.0-unofficial-english-translation.pdf>



[Fact sheets on BAL NC implementation for each balancing zone – status on 1 October 2025](#)
[BAL NC Implementation & Effect Monitoring Report](#)

Not available.

Main updates implemented in GY 2023/24 - GY 2024/25

8. France

Key features

Name of balancing zone(s)	Trading Region France
Distribution system part of balancing zone	No
Hub name (trading platform)	PEGAS (EEX/Powernext)
VTP name	PEG
Implementation date of BAL NC	NaTran and Teréga implemented BAL NC in October 2015. New balancing zone TRF operational since November 2018.
Balancing responsible (Art. 4.4)	TSO - NaTran and Teréga
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	Yes NaTran (ALIZES service) The service is financially neutral for NaTran. It applies for network users who deliver to end customers on a transparent and non-discriminatory basis. It has no impact on cross-border trade. For eligible days of the month M, a residual imbalance is established as the algebraic sum of imbalances related to these days. Network users' residual imbalances are cleared based on the Neutral reference Price (NRP) ¹⁸ . Teréga (SET service) Only available for network users supplying end-consumers consumption points. It incentivizes network users to contribute to the balancing of the system and mitigate imbalances due to NDM delivery points. If the linepack is balanced (no intervention of the TSO needed for the gas day) the shipper's imbalance is invoiced with a

¹⁸ More information is available at the [GRTgaz website](#).

	non-penalized price. Marginal price is applicable when there is a TSO intervention ¹⁹ .
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ²⁰
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented NaTran: Costs and revenues arising from daily imbalance charges and from the balancing actions undertaken are passed on to network users. The neutrality charges are in proportion to the delivered quantities (distribution and industrial sites) of network user's. In order to mitigate possible default in payment by network users the following measures have been taken: Upgrade of Transmission GTCs regarding the guarantee taking into account imbalances exposure, Anticipated invoices. In case of a default attributable to a network user, the bank guarantee is cashed. Teréga: Costs and revenues arising from daily imbalance charges and within day charges and from the balancing actions undertaken are passed on to network users. The result of the balancing for month M is distributed among the network users who have a transport contract with TERÉGA in effect during month M in proportion to the Daily Quantities Allocated at the Consumption Delivery Points for the Days between the 1 st day of month M and the last day of month M. In order to mitigate possible default in payment by network users the following measures have been taken: balancing liability indicator and financial guarantees with flash invoice in case of guarantees overrun. In case of a default attributable to a network user, the bank guarantee is cashed. ²¹

¹⁹ More information is available at the [Additional services page](#) on the website of Teréga, including “Transport Balancing Service” (TBS or SET in French) and charges described in Appendix A: Scale of charges via “[Contractual Information](#)” page.

²⁰ Link to the approved daily imbalance charge calculation methodology (art.20.2):

GRTgaz: <https://www.grtgaz.com/sites/default/files/2024-02/To-find-out-more-about-the-balancing.pdf>

Teréga: [Teréga's Portal \(terega.fr\)](https://www.terega.fr/)

²¹ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):

Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): NaTran: https://smart.natrangroupe.com/en/prix_bourse (detailed information on balancing actions and prices can be downloaded in .xls for each day) Teréga: https://www.portail.terega.fr/app/logistique/intra-day-balancing/actions-on-market Publication of aggregate neutrality charges and balancing charges (art.29.4): NaTran: Balancing section of https://www.natrangroupe.com/en/you-are/customer/shipper/day-to-day-transmission Teréga: https://www.portail.terega.fr/app/edito/la-methodologie-de-terega-pour-le-reglement-des-desequilibres Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): NaTran: https://www.natrangroupe.com/en/our-group/quality-of-service (monthly indicators section and annual report) Teréga: - Global TSO forecasts indicators assessments: https://portail.terega.fr/app/edito/la-qualite-de-service-terega. - K0 value and % replacement correspond to the reliability assessment of NDM off-takes forecasts: https://portail.terega.fr/app/logistique/forecast/public-pitd.

Main updates implemented in GY 2023/24 - GY 2024/25

- [Deliberation of the French Energy Regulatory Commission of 15 January 2014 approving the balancing rules for the GRTgaz and TIGF transmission networks as from 1 April and 1 October 2015](#)
- [Deliberation of the Regulatory Commission of Energy of 10th September 2015 relating to developments of the balancing rules on gas transport networks on 1st October 2015](#)

9. Germany

Key features

Name of balancing zone(s)	Trading Hub Europe <i>(Before 1 October 2021: Net Connect Germany and Gaspool)</i>
Distribution system part of balancing zone	Yes
Hub name (trading platform)	THE EEX
VTP name	THE-VTP <i>(Until 1 October 2021: GPL-VHP and NCG-VTP)</i>
Implementation date of BAL NC	1 October 2015 ²²
Balancing responsible (Art. 4.4)	Market Area Manager Trading Hub Europe <i>(Until 1 October 2021, two MAMs: Gaspool and Net Connect Germany)</i>
Trade notifications, Trading	Implemented Updates in merit order: Against the backdrop of the implementation of virtual interconnection points (VIP) as of 1 April 2020, the hourly products switched to being traded for delivery in a

²² The BAL NC was applicable in Germany already in 2015. However, a balancing platform was used until 1 January 2018.

<i>Platforms, STSPs (Art. 5, 7, 9, 10)</i>	specified balancing zone ("zone-specific" product) instead of at specified network points ("point-specific" product). In addition, a new product called "Short-Call Balancing Services" (SCB) was introduced within MOL 4 on 1 May 2020.
<i>Balancing services (Art. 8)</i>	Yes – procured via Public Tender procedure (according to Art. 8.3 of BAL NC) Balancing Services (Long Term Options) are contracted for emergency situations and are only used when no corresponding short-term offers are available. Priority is given to STSPs, meaning that available short-term offers are used first regardless of the commodity price. Long Term Options can be used in case of a locational balancing demand if no short-term offers within the respective location are available. STSPs are usually very liquid and available for trade at any time of the day. Long Term Options are tendered and contracted for security of supply reasons.
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	Yes (portfolio based - according to Art. 25.2) For every hour within the gas day the market area manager shall net the inputs into the balancing group that are relevant for balancing within that hour against the offtakes from the balancing group that are relevant for balancing. The hourly net total shall be cumulated over the gas day. There shall be no separate consideration of inputs or offtakes at individual points. The following allocation groups shall be distinguished: a) For points that are balanced according to the principle of "allocated as nominated" or "allocated as measured", the allocated quantity is considered for each hour. No tolerances shall be allowed. b) For IDM exit points, either the hourly share of the actual daily offtake quantity distributed evenly (as a flat daily profile) over the entire gas day or the actual offtake quantity for each hour is relevant. The actual offtake quantity is the allocated offtake quantity without calorific value correction but with replacement value correction. A tolerance is allowed for both subgroups: the amount of the tolerance for each hour is +/-7.5 percent of the daily offtake quantity. c) For NDM exit points, the hourly share of the daily quantity of the standard load profile distributed evenly over the entire gas day (as a flat daily profile) is relevant. No tolerances shall be allowed.

	If cumulating the hourly net totals results in a surplus or short supply after taking into account any allowable tolerance (within day flexibility quantity), the balancing group manager is obliged to pay the market area manager a flexibility charge in euros per MWh. The following applies to the imposition of the flexibility charge: a) The market area manager shall only impose a flexibility charge on those days on which opposing balancing actions (purchasing and selling of balancing gas) via MOL rank 1 have occurred in the market area and resulted in costs incurred for the market area manager. No flexibility charge shall be imposed on gas days on which these criteria are not fulfilled. b) The market area manager shall calculate the amount of the flexibility charge for the gas day in question as the quotient of the costs for the flexibility balancing gas weighted by quantity and the quantity of flexibility balancing gas.																		
<i>Incentives (Art. 11)</i>	An incentive mechanism applies for providing an accurate forecast for each network user's non-daily metered off-takes. ²³																		
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented Imbalance charges based on difference between the sum of all entry and the sum of all exit positions per balancing group.																		
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented The following costs and revenues are passed on to network users: <table border="1"> <thead> <tr> <th>Revenues</th><th>Costs</th></tr> </thead> <tbody> <tr> <td>• Revenues from balancing gas</td><td>• Expenditures from balancing gas</td></tr> <tr> <td>• Revenues from imbalance charges</td><td>• Expenditures from imbalance charges</td></tr> <tr> <td>• Revenues structuring charge/flexibility charge</td><td>• Expenditures for RLM quantity differences</td></tr> <tr> <td>• Revenues from balancing neutrality charge</td><td>• Expenditures for positive reconciliation quantities</td></tr> <tr> <td>• Revenues RLM quantity differences</td><td>• Interest charges</td></tr> <tr> <td>• Revenues from negative Reconciliation neutrality charge</td><td>• Other Costs</td></tr> <tr> <td>• Interest earned</td><td></td></tr> <tr> <td>• Other revenues</td><td></td></tr> </tbody> </table> Costs and revenues from balancing activities are divided between the two neutrality accounts according to an allocation formula on a daily basis.	Revenues	Costs	• Revenues from balancing gas	• Expenditures from balancing gas	• Revenues from imbalance charges	• Expenditures from imbalance charges	• Revenues structuring charge/flexibility charge	• Expenditures for RLM quantity differences	• Revenues from balancing neutrality charge	• Expenditures for positive reconciliation quantities	• Revenues RLM quantity differences	• Interest charges	• Revenues from negative Reconciliation neutrality charge	• Other Costs	• Interest earned		• Other revenues	
Revenues	Costs																		
• Revenues from balancing gas	• Expenditures from balancing gas																		
• Revenues from imbalance charges	• Expenditures from imbalance charges																		
• Revenues structuring charge/flexibility charge	• Expenditures for RLM quantity differences																		
• Revenues from balancing neutrality charge	• Expenditures for positive reconciliation quantities																		
• Revenues RLM quantity differences	• Interest charges																		
• Revenues from negative Reconciliation neutrality charge	• Other Costs																		
• Interest earned																			
• Other revenues																			

²³<https://www.tradinghub.eu/Portals/0/Downloadcenter%20-%20THE%20Dokumente/KoV%20XI%20HT%20ENG.pdf>

	The allocation formula is calculated as the ratio between shipper imbalances and imbalances in DSO network accounts. Fixed costs of long-term balancing products and capacity costs for balancing activities at the adjacent trading point are not shared according to the daily ratio but according to a standard yearly ratio. The yearly ratio for a gas year will be calculated once all final allocation data for that gas year has been collected. A set of measures have been taken to mitigate possible default in payment cause by network users (e.g. intraday termination of exit-nominations + termination of all BG in case of substantial short positions in one BG and incorrect registration information + right to inform other MAM/TSO in case of fraud). In the case of payment defaults that were caused by a balancing group manager, the default is allocated to all balancing group manager within the framework of the next charging period. The totality of all balancing group managers ultimately bears the burden of payment for payment defaults.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): Trading Hub Europe > Publications > Balancing gas > External balancing gas Publication of aggregate neutrality charges and balancing charges (art.29.4): Trading Hub Europe > Publications > Prices > Fees and neutrality charges Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): https://www.vku.de/fileadmin/user_upload/Energiewirtschaft/2023-04-27_SLP-Evaluierungsbericht.pdf (German only) https://www.bdew.de/media/documents/250528_SLP-Evaluierungsbericht_4.0.pdf (German only) According to Article 39 (4) an incentive mechanism can be provided that supports the provision of more precise SLP (NDM) forecasting. That mechanism shall meet the criteria of Article 11(4). For further information see the annual report :



[Fact sheets on BAL-NC implementation for each balancing zone – status on 1 October 2025](#)
[BAL-NC Implementation & Effect Monitoring Report](#)

https://www.tradinghub.eu/Portals/0/01_02/2025_MGV_Kurzbericht_%C2%A750.pdf?ver=UDxdHhbwQJZz3uiXK3pkDA%3d%3d²⁴.

Main updates implemented in GY 2023/24 - GY 2024/25

²⁴ Available in German only.

10. Greece

Key features

<i>Name of balancing zone(s)</i>	NNGTS (National Natural Gas Transmission System)
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	NGTP (Natural Gas Trading Platform)
<i>VTP name</i>	Hellenic Trading Point (HTP)
<i>Implementation date of BAL NC</i>	Implemented
<i>Balancing responsible (Art. 4.4)</i>	TSO - DESFA
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	Yes (procured via Public Tender according to Art. 8.3) Balancing services are procured as STSPs are not providing the necessary response to keep transmission network within its operational limits and in the absence of liquidity of trade in STSPs.
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented
<i>Neutrality Arrangements (Art. 29-31)</i>	Partially implemented (no credit risk management) The costs and revenues are passed on to network users (according to art.29.2 BAL NC): • Procurement of Balancing Services • Purchase/Sale of STSPs on Balancing Platform • System usage cost to use balancing services

	Balancing neutrality charges are apportioned amongst network users based on their total transported quantity on a monthly basis. No measure to mitigate possible default in payment of balancing charges by network users have been implemented. In case of a default attributable to a network user, losses are apportioned to the remaining network users.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.desfa.gr/en/regulated-services/balancing/costs Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.desfa.gr/en/regulated-services/balancing/costs Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): No NDM flows. DESFA has been appointed by the NRA as the NNGTS Forecasting Party, the required IT system is currently in development (estimated go-live in Q2 2024) therefore no forecasts are currently provided.

Main updates implemented in GY 2023/24 - GY 2024/25
A Trading Platform was introduced as of 21.03.2022.

11. Hungary

Key features

<i>Name of balancing zone(s)</i>	Hungary
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	Two balancing markets: • Trading platform operated by CEEGEX Ltd.; • Trading Platform operated by FGSZ Trading Platform Ltd (Kereskedési Platform).
<i>VTP name</i>	Magyar Gázkiegymelési Pont (MGP)
<i>Implementation date of BAL-NC</i>	1 October 2015
<i>Balancing responsible (Art. 4.4)</i>	TSO – FGSZ Ltd
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	Yes
<i>WDOs (Art. 24-28)</i>	Yes The introduction of WDO was intended to improve the balance of the gas day portfolio of system users. Its main steps are: • Notification to the network user when the limit is exceeded, • Suspension of the right to sell on a trading platform, • Reduction of exit volumes on the gas day, if necessary.
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented

	Daily imbalance charges are adapted to take into account the price of locational products for the purpose of determining the marginal buy/sell price and the WAP. ²⁵
Neutrality Arrangements (Art. 29-31)	Implemented The following costs and revenues are passed on to network users: • the loss or gain on the purchase or sale of balancing gas, • membership fees on trading platforms, and • balancing gas purchase and sale variable fees. The neutrality charge is calculated on each gas day. The calculated charge is distributed among the system users, taking into account the delivery volumes and imbalance data. Financial settlement is carried out by the Central Clearing Party. The use of a clearing house to secure and settle the balancing activity is obligatory for all network user, in order to mitigate their possible default in payment of balancing charges. The clearing house operates with a complex security system including creditworthiness compliance, individual and collective securities. The losses of the TSO related to the balancing activity of the network user can be recovered through the neutrality pool.²⁶
Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://fgsz.hu/en/for-business/network-users/transmission-system-information/balancing-information Publication of aggregate neutrality charges and balancing charges (art.29.4): https://fgsz.hu/en/for-business/network-users/transmission-system-information/balancing-information Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3):

²⁵ Link to the approved and published daily imbalance charges methodology (art.20.2):
https://fgsz.hu/file/documents/2/2089/uksz_torzs_angol.pdf

²⁶ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):
<https://fgsz.hu/en/for-business/network-users/regulatory-framework/operation-and-business-code-of-the-hungarian-natural-gassystem-obc>



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[BAL NC Implementation & Effect Monitoring Report](#)

Data not public.

Main updates implemented in GY 2023/24 - GY 2024/25
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Implementation of WDOs and LFS.

12. Ireland

Key features

Name of balancing zone(s)	Ireland
Distribution system part of balancing zone	Yes
Hub name (trading platform)	Marex Spectron
VTP name	Irish Balancing Point (IBP)
Implementation date of BAL NC	Fully implemented
Balancing responsible (Art. 4.4)	TSO – Gas Networks Ireland (GNI is both TSO and DSO)
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	No
WDOs (Art. 24-28)	No
Incentives (Art. 11)	No
Daily imbalance charges (Art. 19-23)	Implemented ²⁷ The daily imbalance charges are applied differently for imbalances occurring within the tolerated level of network users imbalance for any

²⁷ Link to the approved daily imbalance charge calculation methodology (art.20.2): [https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-\(Balancing-Shrinkage\)-\(final-clean\)-Version-5.03-.pdf#page=11](https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(Balancing-Shrinkage)-(final-clean)-Version-5.03-.pdf#page=11)

	given day (First Tier imbalance quantity) and imbalance quantities that are greater than each network user's tolerance for the same day (Second Tier imbalance quantity). The First Tier imbalance price will be calculated as equal to either the weighted average price (SAP) derived at the Irish trading platform (IBP), where there have been trades reported on the trading platform for that gas day, or to the SAP derived at the adjacent trading platform (NBP) if there has not been any trade registered on the Irish trading platform or that day.
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented Costs and revenues arising from Imbalance charges, Balancing charges and Shrinkage charges are passed on to network users. Financial security measures have been implemented in order to mitigate possible default in payment of charges by network users. If a default occurs the recovery provisions under the applicable Financial Security arrangement is enacted.
<i>Interim measures (Art. 45-50)</i>	Yes As of 1 October 2020 all tolerances have been removed except a 25% Tolerance at Renewable Natural Gas (RNG) Entry Points. This tolerance apply currently only at Cush entry point (biomethane injection) and is needed to support the development of this nascent gas source. The development at Cush Injection Point has received government grant aid to establish the physical feasibility of such a development. The Regulator will review the tolerances level as more entry points come on line (there are none predicted until the end of 2023 at the earliest) and the gas volumes become relevant.<u>No</u>
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/balancing-actions-and-prices/balancing-actions-energy-in-kwh/ Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/balancing-actions-and-prices/imbalance-charges/



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Report on the accuracy of the forecast of a network user’s NDM off-takes (art.42.3): N/A
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Main updates implemented in GY 2023/24 - GY 2024/25
In December 2025, Ireland ended its tolerance measures for biomethane entry points.

13. Italy

Key features

Name of balancing zone(s)	Italy
Distribution system part of balancing zone	No
Hub name (trading platform)	PSV (MGAS)
VTP name	Punto di Scambio Virtuale (PSV)
Implementation date of BAL NC	1 October 2016
Balancing responsible (Art. 4.4)	TSO – SNAM
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	No
WDOs (Art. 24-28)	No
Incentives (Art. 11)	Yes ²⁸ The incentive mechanism introduces measures aimed at the improvement of the information to the market and the efficiency of the TSO balancing actions. In particular, performance indicators have been defined by the Italian NRA according to the following five mechanisms: 1) Offtakes forecast at the redelivery transport points (D-1 forecast vs. actual) 2) Efficient TSO balancing actions: difference between SMPbuy SMPsell vs. SAP (Weighted Average Price) 3) Residual balancing (use of linepack and operation storage within a predefined range)

²⁸ Link to Regulator's Resolution (Integrated Text on Gas Balancing): <https://www.arera.it/allegati/docs/16/312-16tib.pdf>

	4) Efficient supplying of gas volumes for operating the system: difference between gas supply (forecasted) and effective gas volumes actually needed by the TSO to operate the system 5) Anticipation of the system operating needs (volumes needed by the TSO to operate the system): difference between total gas supply (D plus D-1 auctions) and gas supply in the D-1 auction. 6) Error in forecasting expected offtakes for non-daily metered distribution redelivery points Additionally, the TSO is incentivised to provide accurate forecast of non-daily metered offtakes at the redelivery transport points. In particular, the incentive is calculated proportionally to the difference between D-1 forecast and actual offtakes.
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented²⁹ As per decision of the NRA the price of locational products should be taken into account for the purpose of determining the marginal buy/sell price and the WAP. In practice, locational products have not been activated in the time period covered by this report.
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented³⁰ The neutrality of Snam Rete Gas includes: • imbalance charges, • costs/revenues from: purchasing/selling STSPs and gas volumes for operating the system (e.g. for managing linepack variations) • costs/revenues from purchasing/selling gas volumes for OBA management at interconnection points with other national TSOs, storage and regasification plants. Incentive mechanisms are put in place based on algorithms determining for the TSO a premium only if balancing actions are efficient while a penalty is applied to the TSOs if balancing actions are not identified as efficient by the algorithms (according to the art. 29.3 of the BAL NC). Premia/penalties are not affecting neutrality revenues.

²⁹ Link to the approved daily imbalance charge calculation methodology (art.20.2): See Snam Rete Gas Network Code (chapter 9, paragraph 4.4): https://www.snam.it/en/transportation/network-code-tariffs/Network_Code/Aree/Codice_di_rete.html

³⁰ link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2): <http://www.arera.it/it/docs/16/312-16.htm>

	The tariff regulatory framework set by the NRA provides that the transportation tariff paid by network users includes a specific charge feeding a fund managed by a third party (Cassa per i Servizi Energetici e Ambientali - CSEA). Snam Rete Gas access to this fund in order to settle costs/revenues deriving from balancing actions. Financial guarantees and monitoring of network users' financial exposures are used as measures to prevent default in payment of balancing charges by network users. In case of a default in payment by users, Snam Rete Gas is fully reintegrated, net of enforced guarantees, by a fund managed by a third party (Cassa per i Servizi Energetici e Ambientali - CSEA). Snam Rete Gas is called to return to CSEA the amounts possibly recovered by the above NUs.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): http://www.snam.it/en/transportation/authority-fulfillments-reporting/publications/ See section "Regulation EU 312/2014, Artt. 9 and 29 (rif.: Network code, chap. 9, § 1.3, C)" Publication of aggregate neutrality charges and balancing charges (art.29.4): http://www.snam.it/en/transportation/authority-fulfillments-reporting/publications/ See section "Regulation EU 312/2014, Art. 29 (rif.: Network Code, chap. 9, § 1.3, A and B)" Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): NDM Forecast Accuracy Report Reg. (EC) 312/2014 (snam.it)

Main updates implemented in GY 2023/24 - GY 2024/25



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[BAL NC Implementation & Effect Monitoring Report](#)

14. Latvia & Estonia

Key features

<i>Name of balancing zone(s)</i>	Estonian - Latvian Balancing zone
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	GET Baltic & European Commodity Clearing (ECC)
<i>VTP name</i>	Virtual Trading Point (VTP)
<i>Implementation date of BAL NC</i>	Joint Estonian-Latvian balancing zone operational since 1 January 2020
<i>Balancing responsible (Art. 4.4)</i>	TSOs have implemented TSO-TSO cooperation based market area manager as an internal entity of TSO: Conexus Baltic Grid System Control Centre.
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	Yes (procured via Public Tender according to art. 8.3 of the BAL NC) Balancing services are used when STSPs are not providing the necessary response to keep transmission network within its operational limits, in case if STSPs are economically less efficient, or in case if locational products are needed for balancing.
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ³¹ The daily imbalance quantity for network user's balancing portfolio for each gas day is calculated by TSO in accordance with the following formula: daily imbalance quantity = inputs - off-takes

³¹ Link to approved and published daily imbalance charge calculation methodology (art. 20.2): https://www.conexus.lv/uploads/filedir/Balancing_regulation_ENG.pdf

	The value of the small adjustment applied to determine the marginal prices has been updated³² as of 01.12.2021: Values of currently applicable small adjustment: • marginal sell price (MSP) incentive factor value: 0.95 • marginal buy price (MBP) incentive factor value: 1.10
Neutrality Arrangements (Art. 29-31)	Implemented Neutrality charge shall be set taking into account any such costs and revenues: - costs and revenues of TSO arising from daily imbalance charges; - costs and revenues of TSO arising from the balancing actions; - administrative costs of TSO arising from the balancing actions; - other costs and revenues of TSO related to the balancing activities undertaken by the TSO. This includes TSO costs arising from network user non-payment default provided the measures and requirements for securing fulfilment of contractual obligations, as foreseen in section 4 of the Regulation, were duly implemented. For each gas day, the daily neutrality charge shall be equal to the net sum of all costs and revenues recorded to the balancing neutrality account for the previous month in accordance with sub-paragraph 8.15. of the Regulation divided by the sum of all network users that are not deemed balanced in any of the gas days of the previous month allocated off-takes in the common balancing zone for the previous month. The daily neutrality charge shall be expressed in euro/MWh and be rounded to two decimals. The neutrality charge attributed to each network user that is not deemed balanced in any of the gas days of the previous month shall be equal to the product of daily neutrality charge as determined in accordance with sub-paragraph 8.16. of the Regulation and the sum of all

³² [MSP and MBP incentive factors | Conexus](#)

	network user's offtakes (including domestic exit, cross-border exit and VTP), for gas day D. The neutrality charge shall be expressed in euro, rounded to two decimals and shall be identified as a separate charge in the monthly imbalance settlement report and on the invoice and shall be identified as a separate charge in the monthly imbalance settlement report and on the invoice.³³ When calculating the neutrality charge the TSO shall take into account such costs and revenues arising from the balancing actions, pursuant to sub-paragraph 8.15.2. of the Regulation, which are undertaken by the TSO in the current calendar month (M), but are attributable to the previous calendar month (M-1) for which the monthly settlement as foreseen in sub-paragraph 9.2. of the Regulation, is carried out. During the term of the balancing agreement the network user shall secure the fulfilment of contractual obligations by means of appropriate credit rating of the network user or collateral. The network user may simultaneously choose one or more types of collateral (security deposit or guarantee of a financial services provider or the affiliate entity). In case of a default attributable to a network user, the TSO is entitled to use collateral to cover liabilities of network user towards TSO. If this is not sufficient, costs can be included in the neutrality charge calculation provided the measures and requirements for securing fulfilment of contractual obligations were duly implemented.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): Information is published monthly on: https://www.conexus.lv/balancing-actions Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.conexus.lv/neutrality-charge

³³ Links to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2) of [Elering](#) and [Conexus Baltic Grid](#).

	https://elering.ee/bilansihaldus-0 Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): Report shall be published every two years. ³⁴ Forecasting parties in common balancing zone have operated for less than two years³⁵.
Main updates implemented in GY 2023/24 - GY 2024/25	
<i>Trading platform changed from GET Baltic to ECC</i>	

³⁴ ~~The report is currently under preparation and will be published in the near possible time.~~

³⁵ ~~The report is currently under preparation and will be published in the near possible time.~~

15. Lithuania

Key features

<i>Name of balancing zone(s)</i>	Lithuania
<i>Distribution system part of balancing zone</i>	Yes
<i>Hub name (trading platform)</i>	EEX
<i>VTP name</i>	LTVTP
<i>Implementation date of BAL NC</i>	Interim measures terminated as of 1 April 2019
<i>Balancing responsible (Art. 4.4)</i>	TSO (Amber Grid)
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ³⁶
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented A neutrality account is established covering any costs and revenues related to the balancing activities, such as buying and selling balancing gas, also costs of balancing actions. A neutrality charge is introduced since 1 March 2022. The neutrality fee is calculated as the total amount of all revenues and costs related to balancing activities divided by the total amount of gas released during the accounting period.

³⁶ Link to the approved daily imbalance charge calculation methodology (art.20.2) [Rules of balancing | Amber Grid](#)

	Credit risk management measures have been established to prevent default in payment of balancing charges, which give the TSO the right to request from network users to submit appropriate collateral.
<i>Interim measures (Art. 45-50)</i>	No (tolerances removed as 1 April 2019)
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): Balancing actions Amber Grid Publication of aggregate neutrality charges and balancing charges (art.29.4): Neutrality fee Amber Grid Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): Sutartys ir kiti dokumentai ESO - Energijos skirstymo operatorius
Main updates implemented in GY 2023/24 - GY 2024/25	
Since September 9, 2025, the trading platform has changed from GET Baltic to the EEX trading platform	

16. The Netherlands

Key features

Name of balancing zone(s)	TTF Market Area BBL ³⁷
Distribution system part of balancing zone	Yes
Hub name (trading platform)	ICE Endex Within-Day Market
VTP name	Title Transfer Facility (TTF)
Implementation date of BAL NC	1 October 2015
Balancing responsible (Art. 4.4)	TSO - GTS
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	Yes Network users (NUs) utilise the LFS if their portfolio is out of balance at the end of the gas day. They pay an LFS fee, which is currently set at 0.4% of the neutral gas price. The LFS is offered only by GTS (and not by BBL). The revenues are returned to NUs via the neutrality charge, and GTS incurs no additional costs due to the use of the network buffer. The LFS is offered on a transparent and non-discriminatory basis. The charges apply exclusively to NUs with a balance position other than 0 at the end of the gas day, and the provision of the LFS has no adverse effects on cross-border trade. Network Users use the LFS if they have an imbalance at the end of the gas day. They pay a LFS fee which is currently set at 0.4% of the neutral gas price. The LFS is provided by GTS solely. The revenues are returned to the network users via the neutrality charge and GTS does not make any additional costs, because the network buffer is used. The LFS is offered on a

³⁷ GTS and BBL have a joint entry/exit system, but with two different balancing regimes. On the Dutch side, BBL is integrated into the TTF market area and trades its capacity exclusively on IP Bacton in the UK.

	transparent and non-discriminatory basis. The charges only apply to network users who use the LFS (with a position other than 0 at the end of the gas day) and the provision of the LFS does not have a detrimental impact on cross-border trade.³⁸
WDOs (Art. 24-28)	Yes (System wide (acc. to art. 25.1)) <u>The purpose of a balancing action is to restore the system to within the boundaries of the dark green zone. The commodity that is delivered or received is allocated on a pro rata basis to the network users (NUs) causing the imbalance. The balancing action does not reset a NU's position to zero.</u> <u>NUs have access to near-real-time information about their own position and the balance of the system as a whole. When GTS initiates a balancing action, this is announced via two notifications: one at 10 past the hour and one at 15 past the hour. A market order is placed at a random time between 21 and 22 past the hour. NUs can manage their POS to control their exposure.</u> <u>To ensure that the main costs for NUs related to their balancing obligations pertain to their position at the end of the gas day, NUs pay a fee for using the LFS if their position at the end of the gas day is not zero.</u> <u>WDOs are cost-reflective because the gas delivered or received as a result of balancing actions is allocated pro rata to the responsible parties, based on the accountable POS for the hour of the transaction. The price charged to the responsible parties is the volume-weighted average price of the gas bought or sold on the exchange.</u> <u>No adverse impact on TTF liquidity has been observed as a result of the application of WDOs.</u> <u>NUs must keep their portfolios balanced to minimise the number of balancing actions to be carried out by GTS. Since January 1, 2024, criteria have been in place to identify undesirable balancing behaviour. If NUs meet these criteria, this may result in a 30% financial charge. Continued violations may ultimately lead to the revocation of the TTF license.</u> <u>The aim of the balancing action is to return the system</u>

Commented [BM1]: Network users (NUs) utilize the LFS if their portfolio is out of balance at the end of the gas day. They pay an LFS fee, which is currently set at 0.4% of the neutral gas price. The LFS is offered only by GTS (and not by BBL). The revenues are returned to NUs via the neutrality charge, and GTS incurs no additional costs due to the use of the network buffer. The LFS is offered on a transparent and non-discriminatory basis. The charges apply exclusively to NUs with a balance position other than 0 at the end of the gas day, and the provision of the LFS has no adverse effects on cross-border trade.

³⁸ Additional information on LFS offered: <https://www.gasunie.nl/en/shippers/balancing-regime/linepack-flexibility-service>

	to the border of the dark green zone. The gas that is delivered or received is assigned pro rata to the network users that cause the imbalance. The balance action therefore will not reset the position of a NU to zero. Network users have access to near real time information on their own position and the balance of the whole system. If a balancing action is issued by GTS, this is announced by two notifications: one at ten minutes past the hour, and one at 15 minutes past the hour. A market order is placed randomly between 21 and 22 minutes past the hour. NUs can manage their POS to manage their exposure.³⁹ To ensure that the main costs for NUs in relation to their balancing obligations relate to their position at the end of the gas day, NUs pay the LFS fee ($0,4\% \cdot \text{abs}(\text{POS}) \cdot \text{neutral gas price}$) if their position is not zero at the end of the gas day. WDO obligations are cost reflective because the gas that is delivered/received as a result of the balancing actions is assigned pro rata to the causers, on the basis of the accountable POS of the hour of the transaction. The price charged to the causers is the volume-weighted average price of the gas bought/sold on the exchange. No negative effect of the application of WDOs on TTF liquidity has been observed. Network users must keep their balancing portfolios in balance to minimise the number of balancing actions required by GTS. Criteria have been defined to identify undesirable balancing behaviour. A first case is reported. Repeated cases lead to a 30% financial charge, and continued violations can ultimately result in licence withdrawal. This measure applies from 1 January 2024.
Incentives (Art. 11)	No
Daily imbalance charges (Art. 19-23)	For Regarding GTS: because GTS offers an LFS, the calculation of the daily imbalance quantity has been adjusted in accordance with Article 21.2 of the BAL NC. Consequently, the result of the calculation of the daily imbalance quantity minus the LFS quantity is always zero. This is the final daily imbalance quantity as referred to in Article 21.6 of the BAL NC. GTS offers a linepack flexibility service (LFS). The imbalance quantity calculation has been adapted according to article 21.2 of the BAL NC to consider the LFS offered.

Commented [BM2]: The purpose of a balancing action is to restore the system to within the boundaries of the dark green zone. The commodity that is delivered or received is allocated on a pro rata basis to the network users (NUs) causing the imbalance. The balancing action does not reset a NU's position to zero.

NUs have access to near-real-time information about their own position and the balance of the system as a whole. When GTS initiates a balancing action, this is announced via two notifications: one at 10 past the hour and one at 15 past the hour. A market order is placed at a random time between 21 and 22 past the hour. NUs can manage their POS to control their exposure.

To ensure that the main costs for NUs related to their balancing obligations pertain to their position at the end of the gas day, NUs pay a fee for using the LFS if their position at the end of the gas day is not zero. WDOs are cost-reflective because the gas delivered or received as a result of balancing actions is allocated pro rata to the responsible parties, based on the accountable POS for the hour of the transaction. The price charged to the responsible parties is the volume-weighted average price of the gas bought or sold on the exchange. No adverse impact on TTF liquidity has been observed as a result of the application of WDOs.

NUs must keep their portfolios balanced to minimize the number of balancing actions to be carried out by GTS. Since January 1, 2024, criteria have been in place to identify undesirable balancing behavior. If NUs meet these criteria, this may result in a 30% financial charge. Continued violations may ultimately lead to the revocation of the TTF license.

³⁹ For more information on the randomization, see here: <https://www.gasunie.nl/en/shippers/shippers-information/newsletter-gts-june-2020>

The outcome of the calculation of the daily imbalance quantity minus the LFS quantity will always be zero. This is the final daily imbalance quantity.⁴⁰

- ~~For Regarding BBL: BBL operates an in-out regime. A BBL shipper nominates exclusively on the UK side (IP Bacton) and receives confirmation of this nomination from BBL, ensuring that the shipper is always in balance within the BBL network. On the Dutch side (TTF market area), the shipper must maintain a GTS portfolio that reflects the difference between their IP Bacton confirmation and their offsetting position within TTF. If there is a mismatch between these two, the shipper will have a balancing position in their GTS portfolio (TTF). BBL itself does not settle any accounts with BBL shippers in this regard. BBL has an in-out regime. A BBL shipper only nominates at IP Bacton and gets this nomination confirmed from a BBL perspective, and therefore is always in balance in the BBL. At the Dutch side, the TTF market area, the shipper needs to hold a GTS portfolio which will reflect the difference between the IP Bacton confirmation of such shipper and his counter TTF position. If there is a difference between these two this shipper will get a balance position in its GTS TTF portfolio. BBL itself has no settlements with its BBL network users.~~

Commented [BM3]: Regarding GTS: because GTS offers an LFS, the calculation of the daily imbalance quantity has been adjusted in accordance with Article 21.2 of BAL NC. Consequently, the result of the calculation of the daily imbalance quantity minus the LFS quantity is always zero. This is the final daily imbalance quantity as referred to in Article 21.6 of the BAL NC.

Neutrality Arrangements (Art. 29-31)

The following costs and revenues are passed on to grid users via the neutrality charge:

- balancing actions resulting from an emergency;
- balancing actions resulting from a disruption in the information systems;
- revenues resulting from the use of the LFS;
- costs arising from losses due to non-payment.

The neutrality charge is calculated using the same methodology as the tariffs, namely the RPM (reference price methodology). For each capacity product sold, a neutrality charge is billed to the network users. This ensures that the neutrality costs (or revenues) are

Commented [BM4]: Regarding BBL: BBL operates an in-out regime. A BBL shipper nominates exclusively on the UK side (IP Bacton) and receives confirmation of this nomination from BBL, ensuring that the shipper is always in balance within the BBL network. On the Dutch side (TTF market area), the shipper must maintain a GTS portfolio that reflects the difference between their IP Bacton confirmation and their offsetting position within TTF. If there is a mismatch between these two, the shipper will have a balancing position in their GTS portfolio (TTF). BBL itself does not settle any accounts with BBL shippers in this regard.

⁴⁰ Link to the approved daily imbalance charge calculation methodology (art.20.2)
<https://www.gasunie.nl/en/shippers/terms-and-conditions/nc-implementation>

distributed proportionally across the capacity products sold. Network users receive a monthly invoice specifying the amount to be paid or received in respect of the neutrality charge.

To prevent potential non-payment by network users, various measures have been implemented. Several safeguards have been integrated into the licensing and credit management systems, such as early spent alerts and the revision of credit limits.

In the event of non-payment attributable to a network user, the losses are recovered through the neutrality charge. This is done only after GTS has first attempted to collect the costs from the network user who caused them. The following costs/revenues are passed on to network users:

- balancing actions that occur due to an emergency situation;
- balancing actions that occurred due to a disturbance in the information systems;
- revenues as a result of network users using the Linepack Flexibility Service;
- costs as a result of losses due to default in payment.

The neutrality charge is calculated with the same methodology as the tariffs, the RPM (reference price methodology). For every capacity product that is sold, a neutrality charge is charged to the network users. This way it is guaranteed that the neutrality costs (or revenues) are divided in proportion to the sold capacity products. Network users receive a monthly invoice where the payable amount payable or receivable arising from the neutrality charges is specified.⁴¹

Various measures are in place to prevent possible payment default by network users. Several safeguards in licensing and credit management systems have been introduced, such as early spent alerts and revisions of credit limits. In case of a default attributable to a network user, the losses recovered via the neutrality charge (after GTS has first tried to recover the costs from the network user that caused them).

Commented [BM5]: The following costs and revenues are passed on to grid users via the neutrality charge:

- balancing actions resulting from an emergency;
- balancing actions resulting from a disruption in the information systems;
- revenues resulting from the use of the LFS;
- costs arising from losses due to non-payment.

The neutrality charge is calculated using the same methodology as the tariffs, namely the RPM (reference price methodology). For each capacity product sold, a neutrality charge is billed to the network users. This ensures that the neutrality costs (or revenues) are distributed proportionally across the capacity products sold. Network users receive a monthly invoice specifying the amount to be paid or received in respect of the neutrality charge.

To prevent potential non-payment by network users, various measures have been implemented. Several safeguards have been integrated into the licensing and credit management systems, such as early spent alerts and the revision of credit limits. In the event of non-payment attributable to a network user, the losses are recovered through the neutrality charge. This is done only after GTS has first attempted to collect the costs from the network user who caused them.

⁴¹ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2): https://www.acm.nl/sites/default/files/documents/2020-08/codebesluit_neutraliteitsheffing_en_overschrijding_kredietlimiet.pdf

Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.gasunie.nl/en/shippers/balancing-regime/balancing-actions Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.gasunie.nl/en/shippers/terms-and-conditions Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): After careful consultation with market participants and DSOs, GTS has decided to discontinue the preparation of this complex report. Market participants agree that the current level of accuracy is sufficient.

Commented [BM6]: After careful consultation with market participants and DSOs, GTS has decided to discontinue the preparation of this complex report. Market participants agree that the current level of accuracy is sufficient.

Main updates implemented in GY 2023/24 - GY 2024/25
<u>In 2023, the Dutch regulator Autoriteit Consument & Markt (ACM) published a resolution to prevent undesirable balancing behaviour.</u> <u>This decision, which came into force on 1 January 2024, introduces rules that specify the responsibility of network users to balance their balancing portfolios in order to minimise the need for GTS to take balancing actions. The decision defines undesirable balancing behaviour and sets out the consequences: a financial levy for undesirable balancing behaviour by a shipper and possible revocation of the licence in the event of substantial undesirable balancing behaviour. This resolution contributes to a more effective balancing regime.</u>

17. Poland

Key features

<i>Name of balancing zone(s)</i>	High-methane gas balancing area Low-methane gas balancing area TGPS gas balancing area
<i>Distribution system part of balancing zone</i>	Included in H and L-gas area
<i>Hub name (trading platform)</i>	Towarowa Giełda Energii S.A. (TGE) Trades in adjacent balancing zones possible based on the NRA approval (EEX trading platform: THE - Germany, ETF - Joint Balancing Zone - Denmark and Sweden, LTU - Lithuania); not used in GY 2023/24 - GY 2024/25
<i>VTP name</i>	VTP PL-H VTP TGPS VTP PL-L
<i>Implementation date of BAL NC</i>	1 April 2019 (removal of all interim measures)
<i>Balancing responsible (Art. 4.4)</i>	TSO – GAZ-SYSTEM
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented (Balancing platform removed as of 1 April 2019)
<i>Balancing services (Art. 8)</i>	Used in H-gas area (procured via Public tender according to Art. 8.3 of BAL NC) Balancing services used by TSO do not affect the liquidity of the short term wholesale gas market. This service has been implemented because it was the only possibility to balance the small isolated part of this balancing area. TSO chose the balancing service according to the merit order mentioned in Art.9 (only when there are no other possibilities to balance the system). ⁴²
<i>Linepack Flexibility Service (Art. 43-44)</i>	No

⁴² Link to the published information on balancing services: <https://www.gaz-system.pl/en/for-customers/services-in-the-nts/gas-transmission-through-the-nts/nts-balancing/balancing-actions-and-interim-measures.html>

<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented (interim imbalance charge removed as of 1 April 2019) The daily imbalance quantity is calculated as the difference between the gas quantity that was delivered by the Shipper at the entry points and off-taken by the Shipper from the balancing area at the exit points in a given gas day. In case when the balancing group is created by more network users ("imbalance pooling"), the imbalance quantity is calculated as the difference of gas quantity delivered to the balancing area by all network users within the balancing group and off-taken by these network users at the exit points from the balancing area.⁴³
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented The following costs and revenues are passed on to network users: 1) costs and revenues arising from daily imbalance settlements 2) costs and revenues arising from the balancing actions undertaken by the transmission system operator, 3) other costs and revenues related to the balancing activity. The neutrality charge is calculated based on the costs incurred and revenues generated in a given gas month and is apportioned amongst all network users active in this gas month in the balancing area (the apportionment is done pro-rata to the usage of entry and exit points by the network users).⁴⁴ In order to mitigate the risk of Network users' default in payment regarding any payment due for the imbalance

⁴³ Link to the approved daily imbalance charge calculation methodology (art.20.2): <https://www.gaz-system.pl/en/for-customers/services-in-the-nts/nts-transmission-network-code.html>, <https://www.gaz-system.pl/en/for-customers/services-in-the-tgps/tgps-transmission-network-code.html>

⁴⁴ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2). <https://www.gaz-system.pl/en/for-customers/services-in-the-nts/gas-transmission-through-the-nts/nts-balancing/mechanism-for-assuring-cost-neutrality-of-the-balancing.html>

	charges and balancing neutrality charges, the TSO imposed contractual requirements concerning financial security safeguards on all network users. The Financial Security may be established by the shipper only in one of the following forms: - a cash deposit, returned after settlement of the completed transmission service, - an irrevocable and unconditional bank or insurance guarantee - an irrevocable and unconditional surety, along with a shipper's declaration on submission to enforcement executed as a notarial deed, including the obligation to pay an amount up to the value specified in such declaration under the procedure set forth in the Code of Civil Procedure - a promissory note with a declaration on submission to enforcement executed as a notarial deed including the obligation to pay a sum of money up to the amount specified in the Code of Civil Procedure. The TSO may use the Financial Security if the shipper delays payment for services provided by the TSO at least fourteen days after the payment deadline for providing such services, after TSO's notification sent to the shipper by e-mail or the web-portal informing of the intention to terminate, respectively, the transmission contract, ability allocation, or capacity allocation. The TSO is entitled to satisfy claims from the Financial Security, including overdue receivables.
<i>Interim measures (Art. 45-50)</i>	No (terminated on 1 April 2019)
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.gaz-system.pl/en/for-customers/services-in-the-nts/gas-transmission-through-the-nts/nts-balancing/balancing-actions-and-interim-measures.html Publication of aggregate neutrality charges and balancing charges (art.29.4):

<https://www.gaz-system.pl/en/for-customers/services-in-the-nts/gas-transmission-through-the-nts/nts-balancing/mechanism-for-assuring-cost-neutrality-of-the-balancing.html>

Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3):

<https://www.psgaz.pl/en/method-of-forecasting-quantities-received-by-a-network-user>

Main updates implemented in GY 2023/24 - GY 2024/25

18. Portugal

Key features

<i>Name of balancing zone(s)</i>	Portugal
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	MIBGAS
<i>VTP name</i>	Portuguese Virtual Trading Point (VTP)
<i>Implementation date of BAL NC</i>	October 2016 ⁴⁵
<i>Balancing responsible (Art. 4.4)</i>	TSO - REN
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Trading platform established as of March 2021. Although the trading platform was established, the rules establishing the balancing actions for the TSO via STSP were only published by the NRA in May 2021 with entry into force as of 1 October 2021.
<i>Balancing services (Art. 8)</i>	Yes - Procured until 30 September 2021 via other procedure according to art. 8.4 of BAL NC. Until the establishment of a trading platform, the balancing services were the only tool for performing the balancing actions needed. The new mechanism for balancing services is valid as of 01 October 2021 and is compatible with the balancing actions with STSP on trading platform.
<i>Linepack Flexibility Service (Art. 43-44)</i>	Yes The linepack flexibility service allows a daily deviation between inputs and off-takes to the maximum subscribed value, with later gas reposition. Until 1 October 2021, the Linepack Flexibility Service was not offered based on a competitive mechanism nor it had a price reflecting the respective costs. The LFS was introduced by Diretiva n.º 18/2016, as a transitional arrangement to adapt to BAL NC principles. The linepack flexibility depended on the customer consumption portfolios with daily measurement, recorded in the previous year. This flexibility allowed to absorb the differences between a NU's entries and exits, thus reducing

⁴⁵ Whilst the implementation of the BAL NC had started already in October 2016, a number of essential provisions (i.e. organised market with functioning trading platform and STSPs) were not implemented.

	the imbalance that would potentially be attributed to it. This flexibility has a physical nature and limited the balancing role of the TSO. Until end of GY 2020/21, the LFS has been offered free of charge, which was justified by the absence of a trading platform. From 01 October 2021 the new mechanism fully complies with article 44.1 of BAL NC.
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented ⁴⁶ For each network user, the total gas delivered to and off-taken from the transmission network is taken into account for the purpose of calculation of its daily imbalance quantity; when there is a difference between intakes and off takes, considering eventual linepack flexibility service contracted, a daily imbalance is calculated. The daily imbalance quantity is considered as final imbalance. Due to the pandemic situation, in April 2020 the NRA modified the rules to determine the daily marginal prices ⁴⁷ , changing the prices applicable to the imbalances (Article 8th). In more detail, concerning the calculation of prices, for the determination of the weighted average price (WAP) it is used the WAP of Mibgás (Spain) set to 25°C (WPA of Mibgás*1,0026). For the calculation of the Marginal Buy price, it is used the WAP and added the interconnection charges (the quarterly tariffs in Portugal and the daily tariffs in Spain) multiplied by the penalty factor (1+2.5%). For the calculation of the Marginal Sell price it is used the WAP and subtracted the interconnection charges (the quarterly tariffs in Portugal and the daily tariffs in Spain) multiplied by the penalty factor (1-2.5%). The daily imbalance quantity calculation is adapted in case a LFS is offered. When this service applies, the imbalance is calculated as follows for each network user <i>i</i> that uses the service, on day <i>d</i> : $\text{Imbalance } i,d = \text{Supplies } i,d - \text{Offtakes } i,d + \text{Adjustment } i,d + \text{LFS } i,d$
<i>Neutrality Arrangements (Art. 29-31)</i>	Implemented ⁴⁸ The following costs and revenues arising from balancing activity are included in the neutrality account: -Daily imbalance charge

⁴⁶ Link to the approved daily imbalance charge calculation methodology (art.20.2):

https://www.erse.pt/media/3ynf2ygs/mpgtg_dr.pdf

⁴⁷ National Regulation 356-A/2020 published on the 8th April 2020.

⁴⁸ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):

https://www.erse.pt/media/2m5lrepz/diretiva_9_2021.pdf

	- Financial reconciliation - Balancing actions carried out by the TSO - Cost of access to trading platforms for the purchase and sale of gas - Default in stocks charges - Linepack Flexibility Service Charges - Cost of guarantees for financing operations for the purpose of carrying out the compensation actions Until 01 October 2021 any corrections on the non-daily-metered points were made by a later physical compensation. From 01 October 2021 a financial reconciliation was implemented for this purpose, which is included in the neutrality. Credit risk management measures have been established to prevent default in payment of balancing charges by network users, which are provision of a bank guarantee and retention of sales made on a trading platform. Guarantees are retained in case of a default in payment attributable to a network user.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.ign.ren.pt/en/acoes-de-compensacao-do-gtg Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.ign.ren.pt/web/guest/neutralidade Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): https://www.ign.ren.pt/gestao-tecnica?

Main updates implemented in GY 2023/24 - GY 2024/25

19. Romania

Key features

Name of balancing zone(s)	Romanian National Transmission System Balancing Zone (RO-NTS)
Distribution system part of balancing zone	No
Hub name (trading platform)	BRM-WD
VTP name	VTP
Implementation date of BAL-NC	Termination of interim measures (interim imbalance charges, tolerances) as of 1 April 2019
Balancing responsible (Art. 4.4)	TSO - Transgaz
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Implemented
Balancing services (Art. 8)	No
Linepack Flexibility Service (Art. 43-44)	No
WDOs (Art. 24-28)	No
Incentives (Art. 11)	No
Daily imbalance charges (Art. 19-23)	Implemented ⁴⁹
Neutrality Arrangements (Art. 29-31)	Implemented Any costs and revenues arising from imbalances, purchases/sales TSO/storage and withdrawal on TSO account are passed on to network users. The value of the neutrality account is divided pro-rata by the quantity transported through the NTS. ⁵⁰

⁴⁹ link to the approved daily imbalance charge calculation methodology (art.20.2):
<https://www.transgaz.ro/en/clients/transmission-services/balancing-rules-and-imbalance-tariffs>

⁵⁰ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):
<https://www.transgaz.ro/sites/default/files/Downloads/Legislatie/Ord.85-2017%20actualizat%20cu%20Ord.15-2020%20-neutralitate.pdf>

	In order to mitigate possible default in payment of balancing charges, network users are obliged to provide financial guarantees according to the contractual clauses. In case of a default in payment the final imbalance is compared with the guarantee established and if the imbalance is not covered by the guarantee, the TSO sends the payment notification to the NU. The guarantee for the balancing contract is established by the regulations approved by the NRA, however it does not fully cover the risk of non-payment. The regulations do not ensure the recovery by the TSO of losses resulting from these situations. In all cases, steps have been taken for recovery through the court of law.
<i>Interim measures (Art. 45-50)</i>	No (Interim imbalance charge, tolerances terminated as of 1 April 2019)
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)) : https://www.transgaz.ro/en/clients/operational-data/balancing-actions-ots Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.transgaz.ro/en/clients/operational-data/neutrality-account-nu-daily-imbalances Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): A report shall be published every two years. The first report shall be published in 2024.

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20. Slovakia

Key features

Name of balancing zone(s)	Slovakia
Distribution system part of balancing zone	No
Hub name (trading platform)	No trading platform implemented. Balancing platform used by Eustream. TSO can trade on adjacent balancing platforms (AT) CEGH EEX and (HU) CEEGEX
VTP name	VTP
Implementation date of BAL NC	Not yet fully implemented (interim measures still applied) 16 April 2025, as interim measures terminated on 15 April 2025
Balancing responsible (Art. 4.4)	TSO- Eustream
Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)	Not yet fully implemented Trade notification implemented at VTP Trading platform not implemented
Balancing services (Art. 8)	Yes (procured via public tender procedure according to art. 8.3 of BAL NC) Balancing services are used as there is no trading platform. No
Linepack Flexibility Service (Art. 43-44)	No
WDOs (Art. 24-28)	No
Incentives (Art. 11)	No
Daily imbalance charges (Art. 19-23)	Not yet implemented (interim imbalance charge applied) Implemented from 16.4.2025

	<u>A User shall be responsible for the Daily Imbalance Quantity and shall pay or receive the daily imbalance charge, which shall be determined by multiplying the Daily Imbalance Quantity and the applicable price. The methodology of calculation of the daily imbalance charge is published on the TSO's website. The applicable price is specified in the RONI's price decision.</u>
Neutrality Arrangements (Art. 29-31)	Implemented Any costs and revenues arising from payment/receival of imbalance charges, balancing actions costs and revenues, administrative and other costs are passed on to network users. The balancing charge is apportioned among network users based on the allocated capacity for entry and/or exit border points.⁵² <u>Methodology for the calculation of the neutrality charges is specified in RONI's price decision.</u> In order to mitigate possible default in payment of balancing charges, network users are obliged to provide a financial security.
Interim measures (Art. 45-50)	Yes Balancing platform (planned termination in near future) Interim measures ended on 15 April 2025, imbalance charge: applicable price derived from balancing platform trades. The price applied (in EUR/MWh) to determine the Negative Daily Imbalance Charge shall be the higher of the following two prices: (i) The highest purchase price of gas purchases made on a balancing platform for the relevant Gas Day; the purchase price is the weighted average of prices achieved in one auction made on the balancing platform. (ii) Index (CEGHIX51 + 0.5) * (1 + small adjustment expressed in %). SA=7% The price applied (in EUR/MWh) to determine the Positive Daily Imbalance Charge shall be the lower of the following two prices: (i) the lowest sale price of gas sales made on a balancing platform for the relevant Gas Day; the sale price is the weighted average of prices achieved in one auction made on the balancing platform. ii) Index (CEGHIX + 0.5) * (1 + small adjustment expressed in %). SA=7%
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): <u>BAL NC Eustream</u>https://www.eustream.sk/en-transmission-system/en-other-information/en-3122014-requirements Publication of aggregate neutrality charges and balancing charges (art.29.4):

⁵⁴ ~~The CEGHIX Index is the price index of the trading venue CEGH Gas Exchange of Wiener Börse for the relevant Gas Day.~~

[BAL NC | Eustream](https://www.eustream.sk/files/en/transparency/gas-legislation/bal-nc/eus_neutrality_account.pdf)
<https://www.eustream.sk/en-transmission-system/en-other-information/en-3122014-requirements>

Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3):
Not applicable – no NDM customers in Slovakia.

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[Interim measures ended on 15 April 2025.](#)

21. Slovenia

Key features

<i>Name of balancing zone(s)</i>	Slovenia
<i>Distribution system part of balancing zone</i>	Yes
<i>Hub name (trading platform)</i>	VTP-SI
<i>VTP name</i>	VTP-SI
<i>Implementation date of BAL NC</i>	1 October 2015
<i>Balancing responsible (Art. 4.4)</i>	TSO - Plinovodi
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	Yes (procured via public tender procedure according to Art. 8.3 of BAL NC) The only source of natural gas are the border IPs, therefore the TSO needs a last resort balancing services to keep transmission network within its operational limits in case STSPs do not provide necessary response.
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	No
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented Imbalances are calculated based on each balancing group position as intake to the system -/- offtake from the system +/- trades on the VTP and system differences resulting from the measurement uncertainties. If WAP and marginal prices cannot be retrieved, the last 5 transactions of any trades on the trading platform are

	considered for the purpose of determining the applicable prices. 52
Neutrality Arrangements (Art. 29-31)	Implemented Any costs and revenues arising from payment and receipt of daily imbalance charges, balancing actions charges and other charges related to TSO's balancing activities are passed on to the network users. The sum of the balancing neutrality charges is apportioned among the balancing groups based on the sum of all the imbalances of all the balancing groups and the share of each balancing group.⁵³ In order to mitigate possible default in payment of balancing charges by network users a financial guarantee as an insurance for meeting the liabilities set forth in the concluded balancing contract.
Interim measures (Art. 45-50)	No
Information provision (Art. 32-42)	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.plinovodi.si/en/operation/operation-of-transmission-system/state-of-transmission-system/ Publication of aggregate neutrality charges and balancing charges (art.29.4): https://www.plinovodi.si/en/operation/operation-of-transmission-system/state-of-transmission-system/ Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): The report is available for the users of the services of the forecasting party.

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⁵² Link to the approved daily imbalance charge calculation methodology (art.20.2): <https://www.plinovodi.si/media/vfdeujmq/son-prevod-ang-s-prilogama-%C4%8Distopis.pdf> ;

⁵³ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2): <https://www.plinovodi.si/media/vfdeujmq/son-prevod-ang-s-prilogama-%C4%8Distopis.pdf>
<https://www.plinovodi.si/wp-content/uploads/2011/02/SON.pdf>



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22. Spain

Key features

<i>Name of balancing zone(s)</i>	Spain
<i>Distribution system part of balancing zone</i>	No
<i>Hub name (trading platform)</i>	MIBGAS
<i>VTP name</i>	Punto Virtual de Balance (PVB)
<i>Implementation date of BAL-NC</i>	1 October 2016
<i>Balancing responsible (Art. 4.4)</i>	In the Spanish Gas System, the Balancing regulation designates Enagás in its role of Technical System Manager (GTS) with the responsibility of the residual operational balancing of the transmission system, together with the responsibility for calculating the user daily imbalances and for invoicing the daily imbalance charges.
<i>Trade notifications, Trading Platforms, STSPs (Art. 5, 7, 9, 10)</i>	Implemented
<i>Balancing services (Art. 8)</i>	No
<i>Linepack Flexibility Service (Art. 43-44)</i>	No
<i>WDOs (Art. 24-28)</i>	No
<i>Incentives (Art. 11)</i>	Yes The incentives scheme is based on the performance of Enagás in its role of Technical Manager of the System. It takes into account the effectiveness of the Technical System Manager on the selection and use of balancing actions and it is subject to periodical review by the NRA (CNMC).
<i>Daily imbalance charges (Art. 19-23)</i>	Implemented On the day after the gas day D, Enagás GTS calculates each user's provisional imbalance for the gas day as the difference between the user's inputs and off-takes in

	the network during the gas day. The calculation of the daily imbalance quantity takes into account the unaccounted for gas. Since Gas Year 2019/20 the value of the small adjustment applied to the weighted average price to determine the marginal buy/sell prices has been increased to 3%.⁵⁴
Neutrality Arrangements (Art. 29-31)	Implemented The methodology to determine the neutrality charge⁵⁵ foresee that the costs and revenues arising from the balancing actions are apportioned as follows: the use of STSP title products are assigned to all network users while the use of locational products are assigned to network users which use entry points. In order to ensure that the aggregated financial loss is limited to TSO's inefficient incurred costs and revenues the performance of the Technical System Manager is evaluated through efficiency factors that have a maximum lower limit that is defined by the NRA. When the net economic result of the Technical System Manager is: - Negative, users with accumulated monthly imbalance shall pay the Technical System Manager the aforementioned net economic result in proportion to their accumulated monthly imbalance. - Positive, no amount related to the calculated amount will be charged to the users and this result will be kept in the common account for the settlement of daily imbalances and title transfer balancing actions until the end of the year. Annually, the NRA determines the destination of the quantities in this account. Financial guarantees are required with the aim of mitigating the non-payment of any amount owed from

⁵⁴ Link to the approved daily imbalance charge calculation methodology (art.20.2):
https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-7934

⁵⁵ Link to the NRA approved and published methodology for the calculation of the neutrality charges (art. 30.2):
https://www.boe.es/diario_boe/txt.php?id=BOE-A-2020-7934

	paid or pending settlements. In the event of non-payment by a network user, the Technical System Manager, will act in accordance with the following order of priority: - Execution of the user's guarantees. - In the event that the result of any other settlement to the user is a payment by the Technical System Manager in favor of the user, the Technical System Manager shall deduct the amount due from such payment. - Request from the operators of the trading platforms and central counterparties the amounts withheld by them in accordance with NRA's Circular 2/2020. -If the application of all the above is insufficient, the Technical System Manager shall carry out all the actions within its reach for the recovery of the unpaid amounts, in accordance with the provisions of NRA's Circular 2/2020.
<i>Interim measures (Art. 45-50)</i>	No
<i>Information provision (Art. 32-42)</i>	Publication of balancing actions (Art 9.4, Art. 32.2 and Art. 33.1(g)): https://www.enagas.es/en/technical-management-system/energy-data/commercial-information/registro-acciones-de-balance-en-pvb/ Publication of aggregate neutrality charges and balancing charges (art.29.4): This information is provided through the TPA Portal SL-ATR (Logistics System for Third Party Network Access). Report on the accuracy of the forecast of a network user's NDM off-takes (art.42.3): <i>Enagás, in its role of Technical Manager of the System is responsible for the calculation and publication in the TPA Portal SL-ATR, on a daily, monthly and annual basis, of indicators related to the quality of the users NDM off-takes forecasts. These indicators are calculated and published and an annual report on this is submitted to the NRA (CNMC).</i>



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