THE answers to questions from participants at the ‘Flexible Energy Balancing for Biogas’ event held online in German on 26 June 2025

Question: Until now, the number of flex swaps was limited to one per day. Will this be handled with more flexibility in future?

THE answer: There is no limit to the number of ‘flex swap transactions’ per day in our systems (Customer Portal). Please also note that the maximum flexibility every BGM of a biogas master balancing group can transfer every day within a period of 20 working days (flex swap period) is the daily start value of the flexibility account.

Question: Could you please provide us with the file number of the BNetzA decision in connection with the special abuse proceedings to review the conduct of the market area manager in connection with the termination of a biogas balancing group contract?

THE response: In its ruling of 16 May 2025 (ref. no. BK7-24-01-031), the BNetzA published its decision regarding the abuse proceedings. All applications were dismissed as unfounded, thus confirming the legality of Trading Hub Europe's conduct in connection with the termination.

Question: Is there an upper limit for a positive BG balance carried forward to the next balancing period, especially if positive balances have already accumulated over several years?

THE answer: The upper limit for a positive closing balance carried forward to the end of the next balancing period is determined by the closing balance of the flexibility account at the end of the 20-working-day flex swap period. A positive closing balance, including any positive closing balance carried forward from the immediately preceding balancing period, can be carried forward up to a maximum of the closing balance of the flexibility account at the end of the flex swap period. The balance carried forward to the end of the next balancing period is comparable to a ‘VTP entry’ in the amount of the (permissible) positive closing balance on the last gas day of the balancing period.

Question: Are there any thoughts about allowing the BG balance to be carried forward to the following year with more flexibly rather than on 31 December only?
Background: There is a risk that the upstream supplier will carry forward no or less BG flex. As a result, the available flex range will be more limited than expected and it may no longer be possible to manage the BG in such a way that the BG balance carried forward from the previous year fits the (reduced) BG flexibility.

THE answer: No. As far as we know, this is not being contemplated.

Question: We have a supply contract for biogas and in our biogas balancing group and the exit points for the biogas quantities are NGV refuelling stations. Flexibility is granted for the biogas quantities physically fed into the system. I assume that this means we have no flexibility and will not receive a ‘starting value’ when the flex swap period begins?

THE answer: A flexibility range of 25% is granted exclusively for the biogas quantities physically fed into the system during the balancing period. No flexibility is granted for quantities fed into a biogas balancing group via the virtual trading point. Nevertheless, there is the option to obtain the required/desired flexibility from a third party during the ‘flex swap period’, if necessary.

Question: Are subordinate balancing group managers really only liable up to the amount of their negative BG balance if the MBG manager files for insolvency? Or are any positive BG balance and the flexibility range also lost? Would that constitute the risk in a balancing group cooperation agreement?

THE answer: Any merger of biogas balancing groups comes with both opportunities and risks for the parties involved. All subordinate balancing group managers who are directly connected to the master balancing group in question at the time the claims arise will be liable for the outstanding receivables only up to the amount of the claims attributable to their respective balancing group (see Section 17a (8) of the balancing group contract). The affected subordinate balancing groups will be subsequently invoiced by the market area manager as if the balancing groups had never been connected to the relevant master balancing group for the period of the outstanding receivables. We always closely examine potentially necessary terminations of balancing group contracts, which are a ‘last resort’ and used only where this is permissible under the terms of the contract. For further information, please refer to the BNetzA ruling (ref. no. BK7-24-01-031) dated 16 May 2025 regarding the abuse proceedings, establishing the legality of Trading Hub Europe's conduct in connection with the termination of the balancing group contract.

Question: We would like to conclude a biogas supply contract with a customer. Do we have to open a separate biogas balancing group for this purpose, or can the relevant gas volume also be assigned to an existing natural gas balancing group?

THE answer: There is no obligation to assign biogas to a biogas balancing group. Biogas can also be assigned to a natural gas balancing group, but in this case the flexible energy balancing regulations for biogas do not apply. We are unable to say whether it is necessary to have a biogas balancing group for downstream processes such as certification processes, etc.

Question: Will there be any adjustments to the rules in the light of the recent insolvencies? If so, what adjustments?

THE answer: The GasNZV (Gas Network Access ordinance) will expire on 31 December 2025. We cannot conclusively say whether and, if so, to what extent the BNetzA might introduce additional rules regarding biogas balancing in the final version of GaBi Gas 2.1 following the recent insolvencies.