THE

Regulation

2025 Customer Event for BGMs

October 2025

Agenda

1. **Natural gas**
   - Background to Cooperation Agreement (KoV) amendments
   - Amendments to GabiGas 2.0
   - Amendments applicable to biogas
   - Amendments to REGENT 2026
   - Gas storage neutrality charge
   - GeLi Gas
   - Electronic invoice
   - Timetable for GaBi 2.1/KoV XIV.2
   - KoV XV outlook

2. **Hydrogen**
   - Brief overview of hydrogen ramp-up
   - Timeline for WasABi determination procedure and Cooperation Agreement (KoV) H2

Natural gas

Amendments in KoV XIV.2

Background to amendments made to the KoV

ECJ ruling on the independence of the BNetzA

No normative requirements for BNetzA from the federal government by way of regulation in the future

AReqV → 31.12.2028

GasNEV → 31.12.2027

GasNZV → 31.12.2025

BNetzA project "NEST"

ARegV and GasNEV transposed into various framework and methodological decisions taken by the new large Ruling Chamber

Replaced by decisions on network access

- Network access: KARLA Gas 2.0
- Balancing: GaBi Gas 2.1
- Supplier switching: GeLi Gas 3.0
- Network access and biomethane gas quality: ZuBio (new)

Almost all KoV documents have been amended following the regulatory decisions taken
(only content changes are shown below)

Significant changes – GaBi Gas 2.1

Intervention by MAM in SLP allocations in exceptional situations

- Addition to KoV main part: "In justified exceptional cases, the market area manager **may**, in accordance with the GaBi Gas ruling, take additional measures **with support from the exit network operator and in consultation with the regulatory authority** to adjust SLP allocations in order to reduce the use of balancing actions as far as possible. If the market area manager takes such measures, it shall inform the responsible network operator, who shall in turn inform the shipper. The network operator shall bear no responsibility for any measures taken by the market area manager."
- Corresponding clause included in Appendixes 1 – 4; the actual model will only be included in KoV **XV**

Provision of hourly data used for balancing consumption-metered (RLM) exit points

- The planned amendment from the draft operative part is not included in the current ruling.
- The Federal Network Agency will issue a separate determination in the future, which will be accompanied by a cost-benefit analysis, if necessary.

Significant changes – Biogas

Biogas balancing (GaBi 2.1):

- Exact same wording from GasNZV used in GaBi 2.1;
- Balancing period for all biogas BGMs adjusted to the calendar year;
- Fee for the actual use of the flexibility framework set at €0.001/kWh
  --> adopted without any changes from the GasNZV and thus fixed by the BNetzA for the future to give biogas balancing groups a high degree of planning security based on constant market and trading conditions

Legally compliant advance payment for biogas balancing groups (KoV XIV.2 amendment):

- Changed calculation method (1/12th) per month of the MAM receivables due to the BGM from the last biogas BG invoice)

Significant changes – REGENT 2026

- In earlier REGENT decisions, a discount was granted at the Überackern II network point for supplying the chemical park in Burghausen (border region with Austria).
- This arrangement relied on special DZK (dynamically allocable capacity) balancing groups (DZK type 3).
- The Haidach storage facility has since been connected to the Austrian pipeline network. From the BNetzA's point of view, this network point no longer warrants special treatment.

→ Resulting adjustments in Appendix 1 and **Appendix 4** of the Cooperation Agreement (KoV)

Significant changes – Gas storage neutrality charge

- Draft of a fourth law amending the German Energy Industry Act (EnWG):
- According to the amendment, the gas storage neutrality charge will expire at the end of the year (Section 35e EnWG-E now includes time limit).
- The amendment creates the legal basis and procedural prerequisites for the German government absorbing the deficit of the gas storage neutrality charge account at the end of the year, thereby reducing the balance to zero (Section 35g EnWG-E).
- For the period from 1 January 2026, the amendment introduces a general rule governing the financing of the measures taken by the market area manager to fill the gas storage facilities (Section 35f EnWG-E).
- If absolutely necessary for security of supply reasons, the Federal Minister for Economic Affairs and Energy (BMWE), in agreement with the Federal Ministry of Finance (BMF), may determine by means of a statutory order that the costs of measures taken by the market area manager pursuant to Sections 35a et seq. EnWG shall be passed on either in whole or in part to the balancing group managers (Section 35h EnWG-E)
- → Appendix 3 becomes Appendix 4

Significant changes – GeLi Gas 2.0

- The BNetzA announced its ‘GeLi Gas 2.0’ decision on 22 November 2023.
- The provisions of the Appendix shall apply from 1 April 2026. (see Sec. 1 in operative part)
- The provisions relating to the use of the ‘Applicability Standard 4’ (‘AS4’) message protocol, including the use of a smart meter public key infrastructure, apply from 1 April 2025. (see Sec. 1 in operative part)
  → Changes in Appendix 1 and **Appendix 4**
- Gas supply network operators are obliged to develop, and publish in a standard document, the detailed arrangements made to implement the provisions contained in this decision on supplier switching
  (see Sec. 2 in the operative part)
  → BDEW/FNB-Gas/VKU/GEODE application guide for business processes for gas supplier switching (GeLi Gas 2.0) dated 28 February 2025

Significant changes – e-invoices

- According to Section 14 (1) sentence 3 of the German Value Added Tax Act (UStG), invoices issued after 1 January 2027 must be electronic invoices.
- The relevant processes on the MAM side will be adjusted accordingly from 1 January 2027.
- At that point in time, the transitional provision in the main part of the KoV will no longer apply.
- THE will provide separate information on further steps to ensure legally compliant implementation.
- Until then, the provisions on the use of PDFs by the MAM (set out in the supplementary terms and conditions) will continue to apply.

Timetable for GaBi 2.1/KoV XIV.2

08.05.2024
Preliminary order

03.07.2024
End of 1st consultation period (key points)

13.12.2024
Consultation of operative part

14.02.2025
End of 2nd consultation period (operative part and reasons)

24.09.2025
Publication of the ruling

??.10.2025
Publication of KoV XIV.2
Start of the implementation phase for the amendments made

01.01.2026
KoV XIV.2 enters into effect

KoV XV outlook

1 July 2025:

Start date for drafting KoV XV

Agreed **adjustment to hourly product (Appendix 4 Section 25):**

For the physical fulfilment of the hourly product in the first hour of the gas day, the nomination at the time of the call order shall be used rather than the allocation from the previous hour (analogous to LTO hourly product)).

31 March 2026:

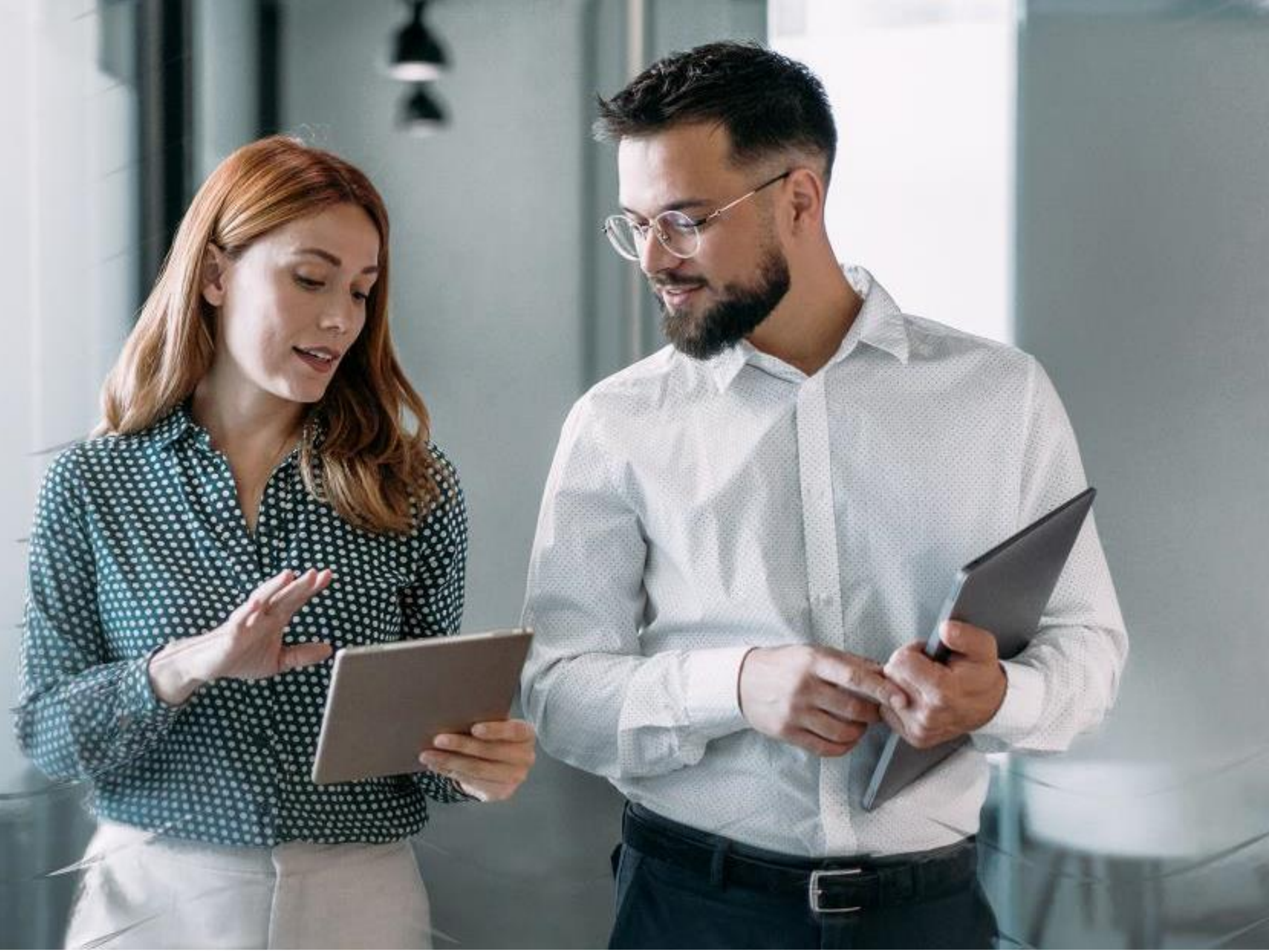
Publication of KoV XV by the associations

1 October 2026:

KoV XV enters into effect

Hydrogen

Brief overview



Hydrogen ramp-up in Germany

The ramp-up of the hydrogen economy in Germany is a central element of the national hydrogen strategy and is currently being driven primarily by infrastructure projects and regulatory measures such as the WaKandA (*'Wasserstoff Kapazitäten Grundmodell und Abwicklung des Netzzugangs'*) and WasABi (*‘Wasserstoff Ausgleichs- und Bilanzierungsgrundmodell‘)* decision procedures of the Federal Network Agency (BNetzA)

Regulatory determination procedures

- WaKandA governs network access and capacity allocation in the hydrogen market area
- WasABi deals with settlement and balancing processes in the hydrogen market area:
  - **Continuous balancing** (there are no plans for a defined balancing period)
  - **15-minute data transmission interval** and a **one-hour balancing period**
  - Mechanism for **balancing quantity differences** (no subsequent data correction)
  - **Financial incentive system** ("helper causer") for the invoicing of balancing actions by the hydrogen MAM
  - **Overall network status** published by MAM will show need for balancing actions in a transparent way

Timeline for WasABi determination procedure and KoV H2

03.07.24
Start of WasABi determination procedure and first consultation

19.12.24
Start of second consultation for the WasABi determination procedure

November 25*
Publication of WasABi determination

July 27
Publication of KoV H2

01.01.28
Lauch of hydrogen market area (WasABi)

End of first consultation for the WasABi determination procedure
30.08.24

End of second consultation for the WasABi determination procedure
28.02.25

Start of KoV H2 process
May 25

Appointment of the market area manager
No later than two months after the publication of the WasABi determination

Publication of concepts for KoV H2
Oct 26

Lauch of data hub
01.11.27

* expected
** The current draft of the operative part envisages a launch on 1 August 2026 (for the data hub) and 1 October 2026 (for the market area). However, these launch dates are expected to be postponed until 1 November 2027 and 1 January 2028, respectively.

Thank you.

TRADING
HUB
EUROPE
keep in balance

Düsseldorf office
EUREF-Campus 1
40472 Düsseldorf
+49 211 542 000 - 0
info@tradinghub.eu

Berlin office
Anna-Louisa-Karsch-Str. 2
10178 Berlin
+49 30 364 289 – 0
info@tradinghub.eu