

Statement of the Basis of the Balancing Neutrality Charges and the Liquidity Buffer for GY 2025/2026

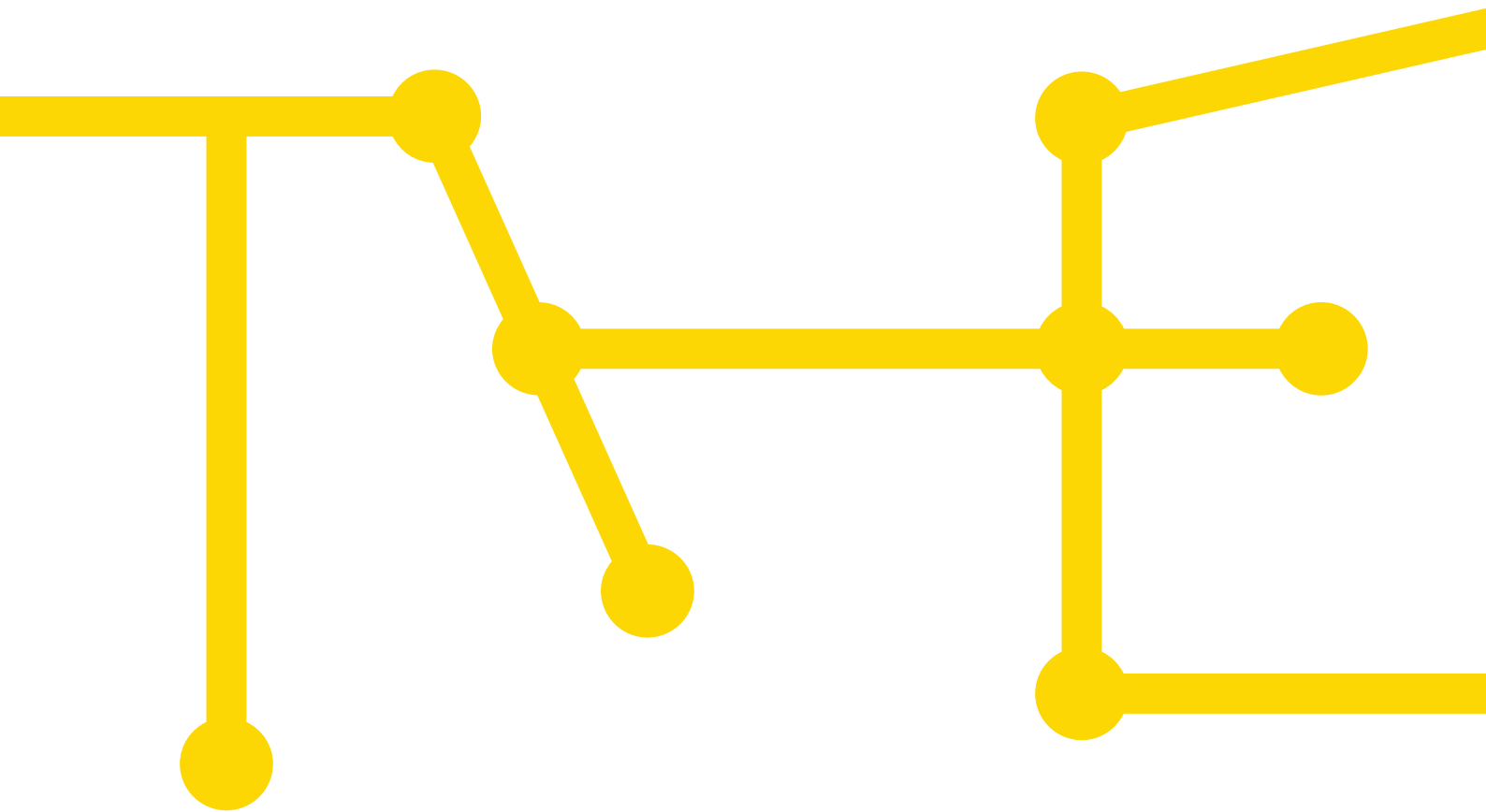


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List of acronyms

EUR	Euro
GaBi Gas	Network Code on Gas Balancing "GaBi Gas 2.0" – ruling BK7-14-020
GY	Gas year
MAM	Market area manager
MWh	Megawatt hour
RLM	Intraday-metered customers
THE	Trading Hub Europe GmbH
TWh	Terawatt hour
SLP	Standard load profile

1 Calculation steps to determine balancing neutrality charges and the liquidity buffer

According to operative part 10(d) of the ruling on gas balancing (implementation of the Network Code on Gas Balancing "GaBi Gas 2.0" – ruling BK7-14-020) (GaBi Gas), the balancing neutrality charges as well as the decision regarding any disbursement have to be published before the beginning of the respective period of validity. Trading Hub Europe GmbH (THE) already complied with this obligation on 14 August 2025. This document describes the calculation basis and system used to forecast balancing neutrality charges and the payouts to be made.

The steps involved in forecasting the balancing neutrality charges and the liquidity buffer have been specified by the Federal Network Agency (BNetzA) with the aim of allocating costs and revenues in a fair and appropriate way. Accordingly, the following factors must be taken into account when forecasting the balancing neutrality charges and the liquidity buffer:

- Forecast of the expected balancing gas quantities
- Forecast of the expected daily imbalance quantities
- Forecast of the expected reconciliation quantities
- Forecast of the development of prices for balancing actions
- Prices for balancing gas and reconciliation quantities according to GaBi Gas 2.0
- Current market developments
- Risks in connection with the GaBi Gas regime
- Determination of the liquidity buffer

For the balancing neutrality charge period from 1 October 2025 to 30 September 2026, THE will levy an SLP balancing neutrality charge of 0.00 EUR/MWh and an RLM balancing neutrality charge of 0.00 EUR/MWh.

Based on these premises and taking into account the steps specified by BNetzA, the forecast of the expected balancing neutrality charges and liquidity buffers looks as follows.

2 Determination of the initial balance as at 1 October 2025 according to GaBi Gas 2.0

The costs and revenues to be expected by 30 September 2025 are forecast on the basis of the most recently published balances of the balancing neutrality charge accounts at the time of calculation. The resulting balance of the relevant balancing neutrality charge account is the starting point for calculating the next balancing period from 1 October 2025 to 30 September 2026. The costs and revenues incurred during the balancing period are offset against the initial balance, and the necessary liquidity buffer is then subtracted. If this results in a deficit, a balancing neutrality charge is levied to cover the deficit while any surpluses are paid out to the market:

	RLM balancing neutrality charge account	SLP balancing neutrality charge account
Balance of the balancing neutrality charge account as at 30 June 2025 ¹	1,199.3	2,130.7
Forecast balance of the balancing neutrality charge account as at 30 September 2025	1,226.6	2,152.4
Balance of forecast revenues and costs of the balancing neutrality charge period ²	-40.0	-142.4
Evaluation of projected risks ²	-1,186.6	-2,010.0
Balancing neutrality charge to be collected	0.0	0.0

in EUR million

¹ Based on the preliminary balances of the balancing neutrality accounts.

² Forecast for the balancing neutrality charge period from 1 October 2025 to 30 September 2026.

3 System for calculating the development of the balancing neutrality charge accounts pursuant to operative part 7(d) of GaBi Gas 2.0

The first step in forecasting the individual costs and revenues for the balancing neutrality charge period from 1 October 2025 to 30 September 2026 is to determine the quantities for the individual product groups. Various scenarios are forecast using mathematical models along with probabilities of occurrence and current market developments while also taking into account historical developments. Pricing is based on the price developments as published by the relevant trading hubs as well as the price forecasts published by market research companies. For the forecast of the cost and revenue positions, the quantities and prices for the relevant balancing neutrality charge period are multiplied. Budgeting of the SLP balancing neutrality charge account therefore leads to revenues of around EUR 878.8 million and costs of around EUR 1,021.2 million. For the RLM balancing neutrality charge account, the resulting revenues amount to around EUR 638.9 million and the costs amount to around EUR 678.9 million.

4 Determination of the liquidity buffer pursuant to operative part 7(d) (aa) of GaBi Gas 2.0

For the period from 1 October 2025 to 30 September 2026, there is a total liquidity buffer requirement for both SLP and RLM of EUR 3,196.6 million in the Trading Hub Europe market area. Divided into the individual balancing neutrality charge accounts, this means a liquidity buffer requirement for the RLM balancing neutrality charge account of EUR 1,186,6 million and a liquidity buffer requirement for the SLP balancing neutrality charge account of EUR 2,010.0 million. The liquidity buffers are determined on the basis of risk quantiles resulting from the mathematical functions relating to the historical data volumes. They are determined in particular by the risks associated with uncertainties in the development of quantities and prices in connection with the procurement and sale of balancing gas as well as invoice/credit items relevant to the balancing neutrality charge account (essentially reconciliation quantity invoices and balancing group invoices).

Risks associated with the procurement of balancing gas: As regards the uncertainties surrounding the balancing gas quantity forecast, it should be noted that the gross quantities procured over the years for the two old market areas combined in SystemBuy vary by a factor of four (GY 2013/2014 to GY 2020/2021) and in SystemSell by a factor of four (GY 2011/2012 to GY 2022/2023) – and the resulting net quantities per gas year also vary strongly (+/- 20 TWh) in both amplitude and direction (purchase/sale). Due to the mild winter in gas year 2024/2025, THE procured balancing gas only during a relatively short period until mid-February 2025 and therefore recorded lower balancing gas expenses overall than budgeted. The price forecast risks considered for the liquidity buffer correspond to the uncertainties between the spot price forecasts valid at the time of planning and future prices in global, quality-specific and local system balancing transactions. The different

price premiums or discounts in the respective order books can result in strong deviations between forecast and actual prices. In addition, the liquidity buffer must take account of any abrupt and significant price changes (due to weather-related fluctuations in demand, global economic developments, price increases due to unplanned maintenance work on the gas infrastructure, low storage levels). In a risk situation, this factor can increase even more drastically (see price development in gas year 2021/2022 with an all-time high of 311.10 EUR/MWh on 26 August 2022). The European gas market continues to respond very nervously to uncertainties, which can result in short-term price increases. Market prices have remained stable at an average of around EUR 40/MWh in gas year 2024/2025. Since the reasons for balancing actions can be diverse, the share of balancing gas allocated to SLP and RLM varies significantly within a year, and also year-on-year. Due to the persistently sluggish economy, the end user sector accounted for more of the balancing actions, as the savings behaviour of households cannot be reliably estimated at present and can therefore deviate significantly from the network operators' forecasts. This has been taken into account for the causes of balancing actions in the liquidity buffer for 2025/2026.

There is also the risk associated with pre-financing requirements due to, inter alia, outstanding quantity reconciliation processes. Mismatches in the network accounts are balanced using balancing gas. The resulting costs are incurred directly by the MAM because of the D+1 invoicing of exchange-traded balancing gas products. Network operators whose networks are responsible for the mismatch are largely invoiced on the basis of the cut-off date balances. Depending on the reason for the mismatch in each network account, these mismatches are balanced out over the course of the year or are only settled as part of the quantity reconciliation process when the cut-off date reading is taken at the end of the respective billing period. This means that the MAM sometimes has to pre-finance balancing actions for up to 15 months until they are billed. This can lead to a considerable financial burden for the MAM, which must be taken into account in the liquidity buffer.

Risks associated with the contracting of long-term options: To increase security of supply, the MAM contracts LTO products for the winter months. A forecast of the costs for LTO products based on the past has been taken into account in the cost/revenue forecast for gas year 2025/2026. Any additional price risk for the contracting of LTO products has been reflected in the liquidity buffer.

Risks in connection with the increase of the clearing houses' margin requirements: The margin requirements of the clearing houses increase as a function of the amount of daily system balancing. Especially for short-term, very high balancing costs, the required margins increase sharply for a period of several weeks. The cash required for this purpose must be kept available by the MAM and deposited with the relevant clearing house at short notice, which means it is no longer available to the MAM for system balancing transactions. The market prices of gas year 2021/2022 have also significantly increased the margining requirements. Especially during the buying phase in the coming winter, very high collaterals may have to be provided, even if the market prices have normalised in gas year 2024/2025 and lower risk prices have been taken into account here.

Other risk positions: Apart from the risks mentioned above, the MAM has other risk positions which must be taken into account when calculating the liquidity buffer. These other risks particularly include model risks relating to balancing gas. In addition, THE is exposed to risks in the event of

bad debts (insolvencies, conduct incompatible with the system, etc.). This also applies to the biogas market, where volatility and insolvencies bring risks that have to be factored in. With the approval of BNetzA, both the review process for admitting new market participants and the monitoring of existing customers have been significantly intensified. Nevertheless, the risk of bad debt losses still exists, also with regard to the conversion system, which the MAM must take into account accordingly when calculating the liquidity buffer. In addition, costs in connection with legal disputes relating to GaBi, costs relating to special clearing cases, imbalances from biogas balancing groups, etc. are summarised as ‘other risk positions’ in the liquidity buffer.

The following table shows the influence of the individual risks on the liquidity buffer:

Risk	Explanation	Influence on RLM buffer	Influence on SLP buffer
Volume risk	Uncertainties, especially due to weather and behaviour of market players	High	High
Price risk	Uncertainties, e.g. due to the gas shortage situation or the behaviour of market players	High	High
Positive reconciliation quantities	Disbursements due to high balancing gas sales	–	Medium
LTOs	Uncertainties, especially due to price and volume risks	Medium	Medium
Increased margining	More margining due to the increased balancing requirement	Medium	Medium
Other risks	Legal disputes, late payments, model risks	Low	Low

Note: Valuation of the individual risks is based on the relation to the liquidity buffer of the relevant balancing neutrality account

5 Determination of the balancing neutrality charges according to operative part 7(d) (bb) of GaBi Gas 2.0

For the levying of a balancing neutrality charge, the calculated deficits and the liquidity buffer requirement of the respective balancing neutrality charge account are allocated to the predicted quantities subject to balancing neutrality charges of the corresponding balancing neutrality charge account for the duration of the balancing neutrality charge period, which gives the balancing neutrality charge in EUR/MWh. The purpose of the balancing neutrality charge is to cover the costs that cannot be offset by credit balances or revenue items of the respective balancing neutrality charge account or any liquidity buffer taken into account. The quantities subject to balancing neutrality charges (RLM or SLP exit quantities) of the corresponding balancing neutrality charge account can be found in the following table:

	RLM	SLP
Quantities subject to balancing neutrality charges	494,990,852	323,667,105

in MWh

6 Distribution of surplus from the respective balancing neutrality charge accounts

Any surpluses that remain after the deficits and the necessary liquidity buffers for the relevant balancing neutrality charge accounts have been taken into consideration are calculated after the final costs and revenues and the final annual pay-out key for the surplus period have been determined. According to the explanations provided above, gas year 2024/2025 was not a surplus period for the SLP and RLM balancing neutrality charge accounts. Consequently, no distribution will be made in the subsequent levy period 2025/2026.

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