

Autoriteit Consument & Markt  
Attn. Mr J. de Maa  
P.O. Box 16326  
2500 BH THE HAGUE

**Gasunie Transport Services B.V.**  
P.O. Box 181  
9700 AD Groningen  
Concourslaan 17  
T +31 50 521 22 50  
E [info@gastransport.nl](mailto:info@gastransport.nl)  
Trade register Groningen 02084889  
[www.gasunietransportservices.com](http://www.gasunietransportservices.com)

Date  
15 January 2025

Telephone  
+31 50 521 2250

Our reference  
MR 25.0006

Your reference

Subject  
2024 evaluation of articles 4.1.4.7 and 4.1.4.8 of the Transportcode  
Gas LNB (Preventing Undesirable Balancing Behavior)

Dear Mr De Maa,

In August 2023 ACM has laid down rules aimed at preventing undesirable balancing behavior via articles 4.1.4.7 and 4.1.4.8 of the Transportcode Gas LNB (hereinafter: "Transportcode"). These rules implement the responsibility of network users to balance their balancing portfolios in order to reduce the need for balancing actions by Gasunie Transport Services B.V. (hereinafter: GTS) to a minimum. In the substantiation of the ACM decision (August 2023), it is explained that these rules will (even) further increase the effectiveness of the Dutch balancing regime. Part of the decision was also the introduction of Article 4.1.4.9 of the Transportcode which requires GTS to conduct a yearly evaluation of the functioning of articles 4.1.4.7 and 4.1.4.8 of the Transportcode. This evaluation needs to be performed together with the representative organizations of gas system users. In addition, article 4.1.4.9 requires GTS to send the results of this evaluation to ACM and to propose any code changes in case the results of the evaluation indicate that such changes are required.

The 2024 evaluation by GTS, together with the representative organizations, has taken place during the GEN-meeting of 12 December 2024. We are happy to inform you that both GTS and the representative organizations that participated in this evaluation concluded that, articles 4.1.4.7 and 4.1.4.8 of the Transportcode function well, which is indicated by the significant drop in the number of balancing actions that GTS had to undertake in 2024 compared to previous years.

**Gasunie Transport Services B.V.**

Date: 15 January 2025

Our reference: MR 25.0006

Subject: 2024 evaluation of articles 4.1.4.7 and 4.1.4.8 of the Transportcode Gas LNB (Preventing Undesirable Balancing Behavior)

This is clear from the information below, which show the number of balancing actions during recent years:

Year	TTF NextHour	TTF WD	Total
2020	114	320	434
2021	133	362	495
2022	26	208	234
2023	12	110	122
2024	5	22	27

During 2024 ten shippers have received a warning from GTS as described in article 4.1.4.7, sub 2b and only one shipper has actually been charged a 30% surcharge (art. 4.1.4.7 sub 2a).

During the evaluation no suggestions were made by any party to make any changes to aforementioned articles. For your information, please find attached our presentation and the minutes of the evaluation conducted on 12 December 2024. These minutes have been approved by all participants of this meeting.

During the GEN-meeting of 12 December 2024 there was, next to the formal evaluation of the functioning of the articles aimed at preventing undesirable behavior also an informal discussion about the well-functioning of the so-called NextHour product. The reason for this informal discussion is that during some NextHour balancing action calls, the market did not offer enough volume to meet total demand. On some occasions, the result was that clearing took place at relatively high (negative) prices. Both representative organizations and GTS consider that changes are desirable to prevent these negative aspects of the Nexthour product. Naturally, we would very much appreciate ACM to be part of the discussion on possible solutions and will keep you informed about the next steps.

**Gasunie Transport Services B.V.**

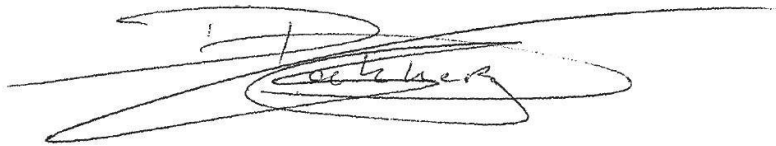
Date: 15 January 2025

Our reference: MR 25.0006

Subject: 2024 evaluation of articles 4.1.4.7 and 4.1.4.8 of the Transportcode Gas LNB (Preventing Undesirable Balancing Behavior)

In case you have any questions regarding this letter, please contact my colleague Anne Spijkstra (a.spijkstra@gasunie.nl).

With kind regards,

A handwritten signature in black ink, appearing to read 'David Bakker', is written over a large, light-colored oval shape.

David Bakker  
Manager Market & Regulation Gasunie