

Guidance notes on the TTF Appendix Version 5.0

1. Reason for Revision

This guidance notes highlight the updates to the TTF Appendix ([Version 4.1, endorsed in September 2025](#)). These changes are necessitated by a communication issued by Gasunie Transport Services B.V. (GTS) on 18 December 2025¹, announcing material changes to the Dutch gas balancing regime with effect from 1 January 2026.

Under the revised regime, where the Dutch gas system enters the “orange” or “red” imbalance zones, GTS will continue to undertake balancing actions on ICE Endex, having first warned the market of its intention to do so. However, GTS will exclusively use the End-of-Day product for balancing purposes and will no longer use Within-Day (Next-Hour) products.

In addition, where GTS undertakes balancing actions, it will apply a financial levy on balancing groups that are out of balance, calculated as a surcharge on top of the transaction price:

- 10% in the orange zone; and
- 20% in the red zone.

These levy levels are stated to apply for the 2026 gas year. According to GTS, the purpose of these measures is to strengthen incentives for network users to remain in the safe “dark green” zone and to reduce reliance on TSO balancing actions.

2. Historical Approach Taken in the TTF Appendix

Historically, GTS has only published imbalance prices for hours in which it actually takes balancing action. In practice, balancing positions may therefore remain cumulative over multiple hours, days, or longer periods without published imbalance prices.

Against this background, the TTF Appendix deliberately adopted an objective deterrent pricing mechanism for hours in which no imbalance price is published, in order to avoid any requirement to analyse or infer trading counterparties’ portfolios. Specifically, the Appendix applied for such hour an imbalance pricing mechanism of:

- 120% of the Dutch neutral gas price for Buy Prices; and
- 80% of the Dutch neutral gas price for Sell Prices, while preserving the contractual right to recover demonstrably higher imbalance costs actually incurred.

This approach was designed to provide a stable and transparent fallback while discouraging strategic behaviour. It also addressed the risk that, once GTS signals in advance that it intends to buy or sell balancing gas in a particular hour, market participants might be incentivised to default on OTC trades (accepting capped damages under the EFET Gas General Agreement) in order to retain gas and sell it to GTS in later hours when

¹ <https://www.gasunietransportservices.nl/en/news/code-amendment-balancing-regime-nexthour-product-to-be-discontinued-as-balancing-tool>

balancing prices could become extreme. The deterrent pricing structure in the TTF Appendix has therefore played an important role in mitigating abuse linked to advance signalling of balancing actions.

3. Reasoning and Changes introduced

The Legal Committee has reviewed GTS` communication and assessed its implications for the TTF Appendix. It concluded that

- the existing definitions of "Buy Price" and "Sell Price", which refer to the highest or lowest exchange price paid or received by GTS during the gas day, are sufficiently flexible to accommodate the transition from Within-Day products to the End-of-Day product;
- however, the newly introduced financial levies applicable in the orange and red zones are not reflected in the TTF Appendix Version 4.1 and/or Version 4.0 and therefore need to be expressly addressed.

Following discussions, the Legal Committee adopted the following amendments:

- to revise the definitions of "Buy Price" and "Sell Price" to incorporate the application of balancing-related levies into the imbalance pricing mechanism and to ensure future-proof wording capable of accommodating changes to levy levels without requiring further revisions to the TTF Appendix;
- revise the definition of "Balancing Action" to ensure it remains product-agnostic, thereby accommodating potential future changes in the exchange products or mechanisms used by GTS for balancing purposes; and
- introduce optionality, via a check box, to allow the TTF Appendix to apply retrospectively to certain existing TTF Transactions.

In respect of hours for which no balancing action has been taken, the Legal Committee agreed to retain a robust and stable deterrent pricing approach. This is considered particularly important given the continued advanced signalling by GTS of its intention to take balancing actions, which was historically and still is considered as being capable of incentivising opportunistic defaults.

4. Supplementary documents offered by Energy Traders Europe

- Change Letter for bilateral amendments - available on the website [Gas Master Agreements & Appendices / Change Letter](#);
- Ratification Letter for updates on the ERDS Platform - available on the website [EDRS Platform](#); and
- Redline comparisons of the TTF Appendix V4.1/September 18, 2025, vs. TTF Appendix V5.0 and TTF Appendix V4.0/26 May 2014 vs. TTF Appendix V5.0 - available on the website [Gas Master Agreements & Appendices / Supporting Materials / Comparisons of Appendices](#).