

Public Consultation on the amendments to the Common Regulations for the Natural Gas Balancing of Transmission System

Summary of the public consultation

The purpose of this consultation document, developed by the Latvian gas transmission system operator Akciju sabiedrība “Conexus Baltic Grid” and Estonian gas transmission system operator Elering AS (hereinafter separately referred to as TSO or jointly – TSOs), is to inform and ascertain the opinion of public regarding the proposed draft amendments to the “Common Regulations for the Natural Gas Balancing of Transmission System” (hereinafter – the Regulation), as coordinated by and between the Public Utilities Commission of Latvia (Decision No. 88 of October 2, 2025), and Estonian Competition Authority (Decision No. 7-29/2025-002 of October 10, 2025) (hereinafter – draft Amendments).

The purpose of the draft Amendments is to introduce changes to Section 10 of the Regulation in order to clarify the principles for the construction of operational balancing merit order lists across different product levels and their activation based on the economically most efficient price within each respective product level, as well as to supplement Section 11 with provisions on self-billing for positive imbalance and negative neutrality charges. The draft Amendments are intended to enter into force 30 days after coordinated approval by the Public Utilities Commission of Latvia and Estonian Competition Authority. Until the date of entry into force of the draft Amendments, the Decision No. 88 of October 2, 2025 of the Public Utilities Commission of Latvia, and the Decision No.7-29/2025-002, October 10, 2025 of the Estonian Competition Authority shall apply.

Please submit your proposals, questions and comments on the draft Amendments (in English) till May 23, 2026 by sending them (electronically) to the TSOs e-mail addresses: JSC “Conexus Baltic Grid” (capacity@conexus.lv) or Elering AS (liis.horak@elering.ee).

Essence and justification of draft Amendments

1. Main amendments to the Regulation:

1.1. Amendment to Section 10 – Construction of the operational balancing merit order list based on product levels

The purpose of this amendment is to align Section 10 of the Regulation on operational balancing with Article 9 of Commission Regulation (EU) No 312/2014 of 26 March 2014 establishing a Network Code on Gas Balancing of Transmission Networks. In accordance with this Article, the TSO shall take into account the cost-efficiency within the respective levels of the merit order referred to under (a)-(c). This provision clarifies that cost-efficiency is a criterion for selection among products within the same level of the hierarchy. To ensure compliance with this requirement, the draft Amendments clarify that the balancing merit order list is established

separately for different product levels and that activation is carried out based on the economically most efficient price within the respective product level.

1.2. Amendment to Section 11 – Introduction of self-billing for positive imbalance and negative neutrality charges

The purpose of this amendment is to introduce a self-billing mechanism for all network users in cases of positive imbalance and negative neutrality charges. Under this approach, the TSO will issue invoice on behalf of network user for the relevant settlement period, covering both negative and positive imbalance quantities, as well as positive and negative neutrality charges. The objective is to harmonise and simplify the settlement process for network users and the TSO. By centralising the invoicing process, the TSO ensures a more streamlined, efficient and consistent settlement framework.