



Association Professionnelle Chaleur Décentralisée

c/o GENERFEU, 3 Chemin des Eclapons, BP 101, 69390 Vourles

To GL Noble Denron and Pöyry Consulting

Answer to DG ENER'S public consultation on the preliminary consultant report on cost-benefit assessment of Gas Quality Harmonisation in the EU

Dear Madam, Dear Sir,

As CER, French trade association for decentralized heating (tubes and luminous radiant heaters, warm air gas appliances), we would like to give our input in your cost benefit analysis.

Different topics could be commented, as the loss of efficiency or trouble shooting that will be at the expenses of the end users. We could also develop the impact on the industry, as there are currently no product and production facilities able to face up such a challenge.

But we need to focus on our main concern.

The technical analysis has given conclusions without factual tests on our appliances. The technical risk has been assessed by analogy with domestic appliances. We strongly disagree with the reliability of such an analysis, as our products present obvious technical differences.

As official technical tests have not been carried out on our appliances, manufacturers' tests suggest that replacement of appliances should be done.

If not, such a gas quality change will create a major public safety issue.

Our position is then :

1 CER support the replacement of the appliances as suggested in the cost benefit analysis, since public safety is our highest concern.

2 As products and production facilities are not currently available, CER does not believe that such a replacement can be achieved within a reasonable period of time.

3 As the conclusion of the cost benefit analysis shows no interest for such a widening of the gas quality, CER suggests to work on a limited gas quality variation within the proven limits of safety,

which has been expressed as:

maximum range from 47.87 MJ/m<sup>3</sup> (same Wobbe index as G222 but with less H<sub>2</sub>) to 52.09 MJ/m<sup>3</sup> (G24) = 52.09 - 47.87 = 4.22 MJ/m<sup>3</sup>, with no possibility of moving this maximum range on a national scale. (G20 = +1.37/-2.85 MJ/m<sup>3</sup>)

We thank you for taking attention to that matter of major importance for public safety.

Best regards.

A handwritten signature in black ink, appearing to read 'ERérolle'.

Edgar Rérolle  
Président

<http://www.cer-chauffage.fr>