

## MARCOGAZ answers to the Cost/Benefit Analysis preliminary report questionnaire

### General

MARCOGAZ has been strongly involved for more than 20 years in gas quality issues in the field of gas appliances, especially with the implementation and the current revision process of the Gas Appliances Directive. We have always supported any initiative aiming at harmonising the gas quality characteristics in Europe. We therefore welcome the initiative by the EU Commission of launching a cost benefit analysis taking into account all aspects of the gas chain, including downstream and end user related issues. We think that harmonising gas quality specification in EU would have a very beneficial influence towards a unique European gas appliances market.

We therefore regret that the preliminary report presented by GL/Pöyry makes some assumptions which are not based on realistic facts and assessed data. Its overall conclusions are highly questionable (132 billion € to change domestic gas appliances is surrealist) and do not reflect the reality of the existing situation in some EU Countries. It seems that the study always considers the worst scenario in EU Countries and does not try to suggest other more economic solutions instead of replacing systematically a huge number of gas appliances. We would also like to get more understanding about the use of the model by the Consultant.

Therefore we think that more efforts should be taken to collect additional information and accurate data regarding National situations in order to better define measures to be proposed. We also propose that regional approaches (possibly by using the regional initiatives) are developed in order to progress towards an EU harmonised gas quality situation.

Do you agree with the high-level conclusions of this report?

NO

It seems that the report is based on wrong assumptions<sup>1</sup>. For instance the EASEE-gas specification (CBP) on Wobbe Index is not wider than the H range for which existing gas appliances are certified (CE marking), and is currently very closed to the Wobbe Index ranges in Belgium, France and Germany and narrower than the Spanish range. See gas groups H and E of the European standard EN 437. See also the official national declarations of distributed gases in the OJEC. At least for this reason regional gas quality harmonisation should be envisaged in this report.

This study is always considering the worst case scenario, even if contradicted by field experience. For instance no treatment of gas is necessary today between Belgium and France for oxygen but the report identifies it as necessary. It seems that the report generally identifies the need for gas treatment everywhere where national specifications differ from EASEE-gas.

Therefore the main conclusion of the report cannot be supported since it does not present realistic options.

- As a manufacturer do you maintain an inventory of installed appliances?

N/A

- Are there any specific gas quality related issues not recognised within this report?

MARCOGAZ is currently looking at the issues related to odourisation practices, but its approach is limited to technical matters (report available soon). An economical approach of the issues related to different odourisation practices would be a welcome addition.

The integration of biomethane into the grid should be also studied since it is widely developed now (see the Commission mandate to CEN M/475).

- Do you manufacture appliances that can operate over the full EASEE-gas specification without loss of efficiency or increased of emissions?

N/A for Marcogaz. However many valuable information can be found in the GASQUAL study where manufacturers were involved.

- Do you have evidence of damage or failures caused by appliance operating on gas that is not compliant with the local gas quality specification?

We have been informed of problems with appliances being submitted to gas quality changes (e.g. Danish case) but the reason seems to be linked to the resetting of domestic gas appliances on site after certification by the manufacturer.

- Would you support the adoption of the proposed EUROMOT gas quality specification,

NO

Many current European supplies would be excluded by such narrow specification. Furthermore some of the parameters are not currently recognised as valid parameters by the Gas Industry (ignitability, laminar combustion velocity). To enforce such tight specifications on the networks for the benefit of a small number of users would not be cost effective.

- Are there any specific circumstances that should be assessed in detail?

Most of the issues developed in the report would benefit of a regional approach instead of the global one that has been developed. More realistic scenario should be undertaken based on existing national situations.

- Do you consider that the data used to undertake this analysis is sufficient to support the conclusions presented in this report?

NO

At least the many data that are currently being produced under the scope of CEN/BT WG 197 should be taken into account.

- Should significant effort be made to improve the data used in the analysis presented in this report?

YES

Particularly by addressing the above comments. Furthermore more transparency on the modelling tool should be given in order to allow a clearer assessment of the way the data have been integrated towards the conclusion.

- Do you have access to further data that could (if it were made available) improve the quality of the data used in the analysis presented in this report?

YES

The MARCOGAZ report on injection of non conventional gases into gas grids (WG-Biogaz-06-18) and the MARCOGAZ reports on national gas quality and on the impact of gas quality on appliances (UTIL-GQ-02-19 and UTIL-GQ-05-04 attached) are giving information about local and National gas quality specifications.

- Can you provide typical detailed gas composition at cross border points?

ENTSOG/TSOs can be contacted to provide with the corresponding data

- If so, can this data be made available (respecting confidentiality, as required)?

YES

- How should data be collected for such a study?

The collection of data and information should be interactive and iterative as a number of issues that were mentioned in the first questionnaire may have been misunderstood leading to incomplete answers or misleading answers.

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<sup>i</sup> This report seems to consider that the Wobbe range proposed by EASEE-gas is exceeding the current H range as hinted by the following excerpts from chapter 6.3 of the report:

- Any future harmonisation of gas quality is seen as an opportunity for manufacturers as gas appliances are currently designed to operate only within a certain gas quality range.
- ...if the gas quality specification of "H family" natural gas was widened to the EASEE-gas limits...
- At this moment in time domestic, commercial and industrial gas-fired equipment is designed and certified to burn natural gas whose limits are defined within EN 437; this is reinforced by safety and efficiency standards for each generic appliance type. As such there is no commercial need for manufacturers to develop equipment that can operate correctly beyond these requirements and to do so will require considerable innovation, significant development costs as well as additional certification costs

The actual figures, expressed in MJ/m<sup>3</sup> with reference temperature 15°C, 15°C are as follows:

- H range as in EN 437 45.7 to 54.7 MJ/m<sup>3</sup>.
- EASEE-gas proposal as in CBP 46.45 to 53.99 MJ/m<sup>3</sup>.