

Brussels, 15<sup>th</sup> September 2011

European Commission  
DG Energy - ENER.DDG1.B.2  
'Electricity and Gas'  
Rue De Mot 24-26  
B-1049 Bruxelles  
Belgium.

Dear Sirs

We have taken notice of your preliminary report for consultation "Study on Interoperability – Gas Quality Harmonisation – Cost Benefit Analysis" dated July 2011.

EASEE-gas will not respond to your consultation questions as our individual members and industries are better positioned to do so.

However EASEE-gas does wish to clarify two points:

Firstly the W.I. range as specified in the EASEE-gas CBP was agreed by the members of EASEE-gas as being the broadest range possible whilst it was known that in some areas of the EU natural gas enters the grid which does not fall within this W.I. range, thereby indicating that the adopted W.I. range is not extreme.

Secondly EASEE-gas wish to make the point that the report is not clear on the fact that the EASEE-gas specifications as presented in our CBP is only applicable at cross border points and it was never the intention to use these specifications throughout Europe (i.e. within the Member States).

The rationale of the CBP was that if all countries adopted the CBP with its associated specification and timing, all gas within that specification could be traded throughout Europe. The actual physical hardware changes either by changing out appliances or installation of processing equipment would only have to be done at the time when Member States would actually be confronted with gas flows within the CBP specification but outside the national specification. Furthermore each Member State could decide at its own discretion which measures to take and when providing the most cost efficient solution whilst ensuring trading of gas is possible throughout Europe. Therefore adopting the EASEE-gas specification for gas quality within countries was never the intention.

EASEE-gas understands that for your modelling a specification was required in order to execute the cost-benefit analysis and that in absence of a common specification it was logical to adopt the EASEE-gas specification.

However we do request you to make it clear in your final report that the use of EASEE-gas specifications within the individual member states was and still is not the intention of EASEE-gas.

Yours faithfully



Peter Meeuwis, EASEE-gas Executive Committee Chairman