

**AFG answer to DG ENER'S public consultation on the preliminary  
consultant report on cost-benefit assessment of Gas Quality  
Harmonization in the EU**

Due to the duration and the period of the consultation on the preliminary report on the Cost/Benefit analysis of Gas Quality Harmonization it was not possible for us to prepare a full answer to the questions.

Nevertheless we would like to express some opinion on the preliminary report.

- The conclusions of the report are only based on the results of work packages 1 to 3 of the Gasqual studies performed under the phase 1 of the mandate.  
It means that the tests results subject of work packages 4 and 5 has not been taken into account. This would have allowed a more detailed approach, segment by segment, and avoid a so radical conclusion.  
This report did not investigate the field of non-domestic appliances for which data issued from work package 1 to 3 were not sufficiently detailed and confirmed and which were out of the testing program.
- This report considers that EASEE-gas Wobbe index range is wider than the H Wobbe range described in EN 437 which is wrong.
- This report does not take into consideration integration of biomethane into the grid whereas this subject is now under discussion at CEN level.
- The report should also consider odorisation which might be a sensible topic for harmonization.
- EUROMOT gas quality specification would not be a solution since it would not fit with LNG characteristics and odorisation needs.