

CONSULTATION QUESTIONS concerning the Cost Benefit Analysis of Gas Quality Harmonisation

Response from Cogen Netherlands

Brief introduction of Cogen Nederland

Cogen Nederland is the representative organisation of cogeneration (CHP) operating companies in the Netherlands. Most CHP installations in the Netherlands use natural gas as a fuel in gas turbines and gas engines. The CHP sector generates more than 50 % of the total Dutch electricity consumption, saving more than 130 PJ of fuel. Also from a security of supply point of view the CHP sector is of great importance. In this respect gas quality is an important issue.

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

With the EASEE-gas specification chosen as the basis for an EU harmonised gas quality standard we agree with this conclusion. We can imagine that with so wide a quality band the costs of adaptation, if any way possible, are very high. Apparently the benefits are relatively small even with this wide quality band.

- As a manufacturer do you maintain an inventory of installed appliances?
- Are there any specific gas quality related issues not recognised within this report?

The EASEE-gas specification is incomplete as far as gas engine and gas turbine end users are concerned. The following gas quality parameters are also very important for a save and efficient use of natural gas:

- ***PE (Propane Equivalent) number***
- ***Change rate of the Wobbe Index (kWh/m³/min)***
- ***Methane number***
- ***Hydrogen content***

- Do you manufacturer appliances that can operate over the full EASEE-gas specification without loss of efficiency or increased of emissions?
- Do you have evidence of damage or failures caused by appliance operating on gas that is not compliant with the local gas quality specification?

The present local gas quality in The Netherlands varies within a much smaller band than proposed in the EASEE-gas specification. Experience in the Netherlands has shown that, even within the current Dutch gas specifications, failures in equipment have occurred due to abrupt gas quality fluctuations

- Would you support the adoption of the proposed EUROMOT gas quality specification, (Appendix B)
- This would be an improvement compared to the EASEE-gas specification. But we doubt whether one gas quality specification can be used to cover the whole of the EU gasmarket. To our opinion regional differences will remain to exists that require specific adaption of gas engines and gas turbines to the regional gas quality.***

- Are there any specific circumstances that should be assessed in detail?
- Do you consider that the data used to undertake this analysis is sufficient to support the conclusions presented in this report?

Yes.

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

No.

- 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?
- Can you provide typical detailed gas composition at cross border points?
- If so, can this data be made available (respecting confidentiality, as required)?
- How should data be collected for such a study?

Timescales

GL Noble Denton and Pöyry Management Consulting have been asked to present this report, and a general update of the project, to the Madrid Forum in September. At the time of writing, we consider it unlikely that firmer conclusions will be discovered in the later phases of this project without significant improvements to the quality and volume of the data. It would be helpful to include an indication to the Madrid Forum as to whether such data might be made available.

We therefore require consultation responses to be provided no later than 16th September 2011