



European Commission
DG Energy – ENER.DDG1.B.2
Electricity and Gas
Rue de Mot 24-26
B-1049 Brussels
Belgium

15 September 2011

Dear Sir

ICOM Energy Association Response to the Preliminary Consultation Report on Cost Benefit

ICOM Energy Association represents and promotes the common interests of 43 market leading company members in the UK Industrial and commercial heating sector. Member companies produce advanced technologies for heating in buildings, including: boilers, radiant heaters, warm air heaters, burners and micro CHP. The industry invests massively in research and development in order to create technically advanced, safe and energy efficient heating systems.

ICOM members believe the main issues associated with gas quality harmonisation are answered within the thirteen main questions of the consultation document.

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

ICOM members agree with the high level conclusions of this report that a net benefit would not materialise from harmonisation of Europe's gas quality specifications.

2. As a manufacturer, do you maintain an inventory of installed appliances?

Most ICOM members are manufacturers who sell to distributor's or wholesalers and therefore don't have or record details of the final product installed location

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

We have not identified any issues that are not already included in the report.

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

ICOM members have indicated that their appliances will not operate over the full EASEE-gas specification without loss of efficiency or increased of emissions.

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

Most ICOM members sell exclusively within the UK which has a tight gas quality specification and therefore don't subject their products to gas that is outside the UK specification. However some manufacturers have indicated product damage and increased CO where higher calorific value LPG (outside the normal specification) has been used

6. Would you support the adoption of the proposed EUROMOT gas quality specification(Appendix B)?

ICOM members do not support the introduction of the EUROMOT gas quality specification. We assume that the proposed Wobbe would be the EASEE-gas wobbe range and we do not support the introduction of this for the UK.

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

No there aren't any specific circumstances that should be assessed in more detail.

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

Yes - though some poor quality data has been used and a number of assumptions made, the discrepancy between costs and benefits is so great that we would consider it unlikely that even more data would yield a different overall conclusion.

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

No - see our answer to question 8.

10. 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?

We have no further data that would be of use.

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

ICOM Energy Association is an association of product manufacturers, not gas transporters. We therefore have no knowledge of this subject area.

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

See question 11

13. How should data be collected for such a study?

We don't think any further data should be collected on this subject. Further study is not required.

We trust you will take full account of our industries views.

Yours faithfully

for

ICOM Energy Association



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Technical Director and Deputy Chief Executive

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