

Cogen Europe reply to the public consultation on Preliminary Consultant Report on Cost-benefit assessment of Gas quality harmonization in the EU

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CONSULTATION QUESTIONS:

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

Cogen Europe agrees with the conclusions of this report. With a wide quality range, the EASEE-gas specification, chosen as the basis for an EU harmonized gas quality our members believes that adaptation costs are disproportionately high compared to the expected benefits. In general, we are doubtful that a single gas quality specification can fit all the gas equipment manufacturers and users across Europe.

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

Cogen Europe as asked its equipment manufacturers to comment on that specific point but the first elements we got from them suggest that the supply/distribution/retail chain does not allow tracing where pieces of equipment -used to build a system- are sent.

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

In our view, additional parameters should be looked at when setting gas quality specifications. Of notable importance for the safe and efficient use of gas are:

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

In addition, due to the expected uptake of gases originating from renewable or waste sources, the European Commission should thoroughly monitor, and take action if needed, in the event of an increased level of impurities (based on their associated impact) in the natural gas grid.

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

Our members have been asked to comment on that point, but in general national/regional gas quality specifications have a much narrow quality range, which provides for good operating results.

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

Out of the numerous technologies utilizing gas, fuel cell technology deserves a special attention. Fuel cells operate under very stringent gas quality specifications; the energy efficiency and more importantly the life time of fuel cell appliances are put at risk when gas quality varies too much.

- Would you support the adoption of the proposed EUROMOT gas quality specification, (Appendix B)

- 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?

Our organization believes that the data which have been collected are good enough to support the conclusions of the report.

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

Our sector would like to highlight that any next step should first weigh the pros and cons of launching a new data collection process, and should use this report as a starting point. If the European Commission is to move forward the matter and to launch this process, it must be acknowledged that this huge task will require the full commitment of numerous stakeholders and the mobilization of significant human resources.

- 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?
