



INT NC amendment for Gas Quality

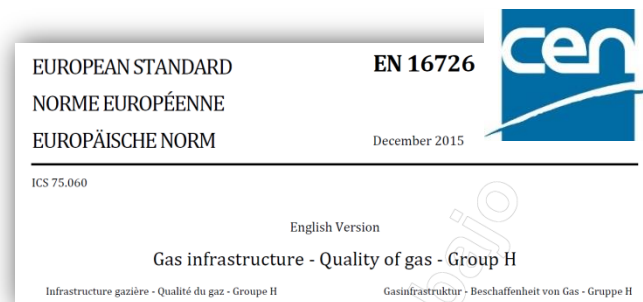
GIE view

Carmen Rodriguez
GIE Gas Quality sub-TF

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- GIE supported and was deeply involved in the development of the European Standard on Gas Quality – Group H (EN 16726:2015)
- Harmonized specifications across the EU would help to create the effective interoperability of networks, facilitating a free trade of gas
- However, the enforcement of harmonization through the amendment of the Network Code is not necessarily the most efficient way to remove gas quality barriers. Network Code already foresees rules to address such gas quality barriers. The implementation of the new gas quality standard should not introduce new barriers, unnecessary additional complexity or costs
- It is important to clearly define the responsibility for gas quality compliance at any time when it is produced, transported, distributed, stored, ... and used





GIE views on the INT NC amendment

1. Scope

EN 16726:2015 envisages application to the entire gas chain (from transmission to distribution to end use)

The INT NC places obligations only on TSOs and is focused on applying to IPs...

The scope needs to be clarified as part of the impact analysis.

2. Values and parameters of the standard

Launching of the pilot project II is foreseen in the short-term and the parameters to be covered are not clear yet (**Wobbe Index?**, S?, H₂?)

Wobbe Index and H₂ for example are not addressed in the standard, whereas those are key elements of interoperability

It is necessary to clarify which parameters/values are not to be questioned and which are still open

Sensitivity of the UGS to the higher limits of O₂ and CO₂ should be taken into account. The flexible limits in the standard should prevail although there is uncertainty about how these would be applied

3. Obligations and cost recovery

- The **implementation** of the standard **should not impose additional obligations to infrastructure operators**
- **Adjustments** to be made in order to achieve gas quality standards in line with **European laws** should be made in the most economical and efficient way taking into consideration all operators (producer, transporter, distributor and storage)
- If additional investments have to be made by operators, **the full cost recovery** (CAPEX & OPEX) by operators **should be assured** independent of the use of the facilities



GIE offers support and cooperation in considering together with ENTSG
how the amendment could fit with the INT NC.

The amendment should be supported by a robust impact analysis.



Gas Naturally

GN is a campaign to showcase the essential role of natural gas in the forthcoming energy revolution. The mitigation of climate change has become one of the most important issues for the gas industry.

Thank you for your attention

