



***3rd Workshop on Interoperability Network Code
regarding Gas Quality, Brussels, 16 November 2016***

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securing competitive energy for industry



We welcome the decision of the Madrid Forum not to pursue legally binding provisions of EN16726:2015

- ENTSOG concluded that gas quality did not lead to cross-border trade barriers in the past since the TSOs dealt with it adequately (voluntary)
- Scenario's of ENTSOG show that legal binding of EN16726:2015 will not provide the required limitations and legal guarantees for exit points
- Additional provisions and/or requirements with regard to the WI are needed to secure the safety of transport, distribution and use of H gas
 - Ranges/fluctuations as well as for the related possible safety and performance issues on end use are not covered yet



We also welcome the decision of the Madrid Forum to support CEN including to elaborate the possibility of regional bands

The Forum confirms its support for CEN to carry on the work on finding an agreement on a band for the Wobbe Index, **elaborating on the possibility of regional bands**, to be included in an updated CEN standard **while ensuring the integrity of the existing standard** and calls on market participants to be constructively engaged in this process. The Commission will reconsider further harmonisation activities in light of the outcome of the CEN revision work.

Too wide ranges of WI and high speed quality changes could jeopardize end-users operation: safety, emissions and (energy) efficiency and even cause trips of crucial processes such as electricity generation and sensitive industrial production



Flashback damage to burners has been linked to high levels of higher hydrocarbons

gas quality should be user led, not supplier led,
which should also apply for political decisions



***Don't ask what your customer can do for you,
ask what you can do for your customer***

Risks should be managed at the source, not at the end-of-pipe

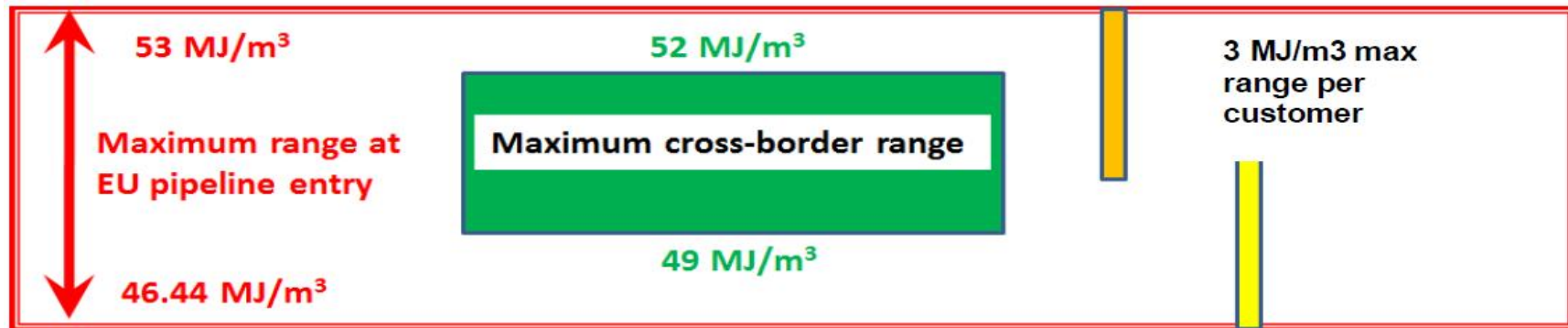
recent examples are still showing the opposite

- Engie(CRIGEN wobbelis 1.0)
 - It's **nice to have** a new service dealing with variations in gas quality in the thermal process industry. But we **need to have** new services dealing with variations in gas quality before it enters the pipe.
(Moreover ENGIE did not compare the costs of entry point treatment and those at the end user side including possible negative consequences for the users).
- OBAN (Opening up the Gas Market) leads to increasing risk for black swans: the actual test WI bandwidth was quite small
 - Study was triggered to reduce processing costs
 - Focus is on domestic appliances
 - Assumptions about large scale industrial appliance are not tested and might be false
 - Process industry (feedstock) not included

Don't mix up solutions for domestic appliances with (large) tailor made designed industrial applications



We recommend to adjust Regulation 714/2009 & Mandate M/400



Extend Mandate M/400 to CEN for standardization H-gas Qualities

- Define specifications **for cross border IPs** that are as wide as possible within reasonable costs **and elaborate the possibility of regional bands as small as possible**

Repair Regulation 714/2009 w.r.t. gas quality treatment

- **(re)define joint responsibility of suppliers and TSO's on EU entries** relating to IP specification **and** national requirements linked to regional exit specifications. (treating the gas at the beginning of the pipe has always been the most safe and efficient option)