

DN technical representatives from the quarterly CV Liaison meetings discussed the practical and economic injection of low volume and low CV gas into the distribution system. Two questions have arisen that are relevant to the mod 251 discussions.

The cost of a complete Ofgem approved system is prohibitive for low volume inputs, and approval of lower cost systems would be difficult at present as a clear specification for the approval process does not exist. The criteria for acceptance of the ISO 10723 test that is currently part of the approvals process is based on a CV uncertainty in the measurement, of 0.1MJ. There is no documented evidence as to where this value comes from but it is believed to have been chosen from the specification of the market leader (and only practical process gas Chromat) chosen for the FWACV measurements.

Our group believes that with the requirement for much lower energy inputs to an LDZ, coupled with the work done by the OIML group in Europe on scalable uncertainty, there is an opportunity, for the use of lower cost instruments, of higher CV uncertainty, on lower volume sites.

Qu.1 Will Ofgem consider approval of lower cost measurement solutions, with higher CV uncertainty, for use on low volume sites?

Clarification on a second point we feel would help in moving towards a practical solution for inputting lower volume, lower CV gas; this would be a formal statement on co-mingling from Ofgem. Having the official CV measurement after the Co-Mingling of the lower CV gas, with the higher CV LDZ gas, but ahead of any customers, would avoid triggering the CAP and will remove the requirement for enrichment.

Qu.2

Are Ofgem prepared to issue a statement on co-mingling?