

Pre-Normative Scope for the Pilot Project II Continuation of Mandate M/400 - UK Comments

These comments follow a consultation of UK Gas Stakeholders representing the full gas chain, e.g. from gas producers, transporters and appliance manufacturer interests and including various HMG Departmental and Regulatory representatives. The UK appreciates the opportunity to comment on the proposed scope of work to continue mandate M/400 with a view to harmonisation of Wobbe Index (WI). Our comments appear below.

The UK considers that the 'objective and scope' section contains insufficient detail and does not adequately reflect the output from the brainstorming session held in Brussels last November. For example, CEN's report of that meeting stated that the possibility of regional harmonisation should be considered, whereas the stated scope is only for "a harmonised range...that is acceptable to all CEN countries". CEN's report also concluded that a statement of the problem and expected benefits of harmonisation should be investigated together with an implementation roadmap, neither of which is included in the scope proposed. Furthermore, our understanding was that the focus would be solely on WI. The inclusion of Total Sulphur is therefore concerning and we would be interested to understand the reason for this and the potential inclusion of other aspects which are as yet undefined.

WI harmonisation debates have been pursued for many years and the UK is keen to avoid revisiting the same arguments unless a robust case is made to demonstrate the problem and the benefits of harmonisation. We do not believe that case has been made.

In our view, it is essential that the project begins by examining the reasons why CEN TC/234 was unable to recommend a single harmonised range. We believe that there are four reasons for this, which are explained in the bullet points below.

- Member States (MS) have previously been uncomfortable with WI proposals due to the lack of a clear legal and regulatory framework for implementation. Our understanding of a harmonised specification (for both WI and other parameters) is that it would be used to ensure that gas within that specification could not be refused by gas transporters in order to fulfil third party access objectives and that gas that does not comply with the specification may still be permitted by the gas transporter if it is considered acceptable. This understanding is based on Mandate M/400 itself which states "*these technical rules shall ensure the interoperability of systems shall be objective **and non-discriminatory***". There is a reference at this point in the mandate to Directive 2003/55/EC, which contains numerous references to non-discrimination, the key one being paragraph (24):
 - "24) "Member States should ensure that, taking into account the necessary quality requirements, biogas and gas from biomass or other types of gas are granted non-discriminatory access to the gas system, provided such access is permanently compatible with the relevant technical rules and safety standards. These rules and technical standards should ensure, that these gases can technically and safety be injected into, and transported through, the natural gas system and should also address the chemical characteristics of these gases."

When this text was written, there was not an agreed European level view about what these “relevant technical rules and safety standards” were; in other words, there was not a harmonised gas quality specification, hence Mandate M/400 was produced.

The UK believes it is critical that this background context is recognised by CEN and the issue of how the specification is intended to be applied is made clear at an early stage. This is necessary in order both to allay concerns that some MS may have about what harmonisation might mean for them and to avoid potential unintended negative consequences for the EU’s security of gas supply. The work that ENTSOG is now commencing in respect of codifying the CEN standard on gas quality as it is today (with WI absent) may help to inform this.

- MS have different national WI specifications and appliance populations, with varying degrees of knowledge about appliances that are currently installed and how they would respond to a different WI range. Whilst it is important that information on individual MS appliance populations is shared to enable a common understanding of each MS’ situation, it should also be recognised that any project undertaken to collect this information is likely to be costly and take time for individual MS.
- MS have different views about what constitutes a ‘safe’ WI range, which is complicated by appliance adjustment practices in some MS and the influence of other factors on safety such as adequate ventilation and proper installation / maintenance of appliances.
- Member States have different perceptions about the future quality of gas that will be transported through their networks. For example, some MS may be content with their current situation – perhaps expecting to receive and transport a restricted range of actual gas quality, despite having a wide specification – because they do not expect to see a wide range of gases in the future.

In our view, unless the above issues are recognised and addressed, we have little confidence that Pilot Project II will succeed where previous efforts have failed.

It is also not clear from the scoping proposal what is expected of individual MS, so we would welcome greater clarity on this as well as how MS will engage with the CEN team.

In fully supporting the broad objectives of ensuring the future security and safety of gas supply, the UK is also concerned to avoid potential unintended consequences of implementing EN 16726.

The UK stakeholders request please that the above issues are added to the TC 234 Agenda for discussion.