Single Approach to Gas Quality

Consultation Paper CER/08/101, Published 20th June 2008

Response To Consultation By AES

14th July 2008

In response to the CER consultation on "Single Approach to Gas Quality", CER/08/101, dated June 20, 2008, our comments are as follows;

- 1. We noted that the quality of gas currently being used in both RoI and Northern Ireland (which either comes from UK or from Inch through CSA) conforms to the Gas Safety (Management) Regulations, 1996 as outlined in the Gas Act 1997, which has a narrower Wobbe Index (WI) range as compared to the range defined in RoI Code of Operations. Employing wider WI has safety concerns unless all downstream non compliant appliances are replaced. The in depth review of gas quality issues carried out by Department of Trade & Industry (DTI) in GB showed that the costs and safety concerns regarding the replacement/modification of downstream appliances far outweighs the costs of treating non-compliant gas prior to entry to the transportation network. The BGN report also highlights CO emissions concerns that may arise in gas appliances should wider WI specification gas be allowed into the Irish network as Irish and UK gas boiler and heater appliance populations are comparable in type with similar leading manufacturers and models. BGN also concluded that the downstream option of replacing/modifying appliances to cope with Code of Operations WI gas is too costly and is unlikely to fully resolve the safety issue. Keeping in view these facts, AES is of the view that the WI range in the Code of Operations should be brought in line with the GS(M)R range to ensure that the gas entering the Irish network should always conform to GS(M)R.
- 2. The WI is a measure of chemical energy of gaseous fuel that can flow through an orifice of fixed size at a constant pressure drop. Since many natural gas appliances and other combustion devices have a fixed orifice, changes upwards or downwards in WI give a direct correlation to changes in the amount of heat generated per unit of time. As many of the combustion devices design is based on a certain WI range so widening this range may have an impact on gas turbines and gas fired boilers, which are currently in operation and changes to the combustion and control system etc along with cost implications on those generators have to be considered should wider WI specification gas be allowed into Irish network
- 3. As mentioned in point-1, AES is of the view that gas entering into Irish gas transmission network should be compliant with GS(M)R and as such propose that any treatment and operational costs (associated with any treatment facility) should be borne by the supplier and the customers should be held neutral in this regard.
- 4. AES concurs with the view that the gas quality measurement arrangements should be reviewed to ensure that the gas quality complies with GS(M)R