

EUROMOT POSITION

Amendments to a Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the internal markets for renewable and natural gases and for hydrogen (recast) - 2021/0424(COD)

28th of October 2022

1. General

In this document feedback on the European Commission Gas Directive revision proposal /1A, 1B/ is given.

2. Amendment Proposals

Text proposal by the Commission	EUROMOT proposal for amendment
Article 30 – paragraph 7 The transmission system operators shall make public detailed information regarding the quality of the gases transported in its network, which might affect network users, based on Articles 16 and 17 of Commission Regulation (EU) 2015/703 .	Article 30 – paragraph 7 The transmission system operator shall make public detailed information regarding the quality of the gases transported in its networks, based on the properties of the gas as present in the revised EN 16726:2015 standard. Information shall preferable be provided in real time.

<p>Article 35</p> <p>Transparency requirements concerning distribution system operators Where distribution system operators are responsible for gas quality management in their networks, they shall make public detailed information regarding the quality of the gases transported in their networks, which might affect network users, based on Articles 16 and 17 of Commission Regulation (EU) 2015/703.</p>	<p>Article 35</p> <p>Transparency requirements concerning distribution system operators Where distribution system operators are responsible for gas quality management in their networks, they shall make public detailed information regarding the quality of the gases transported in their networks, which might affect network users, based on the properties of the gas as present in the revised EN 16726:2015 standard. Information shall preferable be provided in real time.</p>
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<p>Annex 1 – Section 3 – Chapter 3.3 Point 4</p> <p>Transmission system operators shall publish measured values of the gross calorific value, the Wobbe index, the hydrogen content blended in the natural gas system, methane content and oxygen content at all relevant points, on a daily basis. Preliminary figures shall be published at the latest 3 days following the respective gas day. Final figures shall be published within 3 months after the end of the respective month</p>	<p>Annex 1 – Section 3 – Chapter 3.3 Point 4</p> <p>Transmission system operators shall publish measured values of the gas quality parameters of the revised CEN 16726:2015 standard including the net calorific value at all relevant points, information shall preferable be provided in real time.</p>
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Justification for above mentioned amendment

According to the Gas Regulation proposal transmission, distribution system and network operators shall *make public detailed information regarding the quality of the gases/hydrogen transported in their network which might affect network users.* Gas quality has a fundamental impact on amongst all safety, emissions, product quality and energy efficiency and **thus sufficient information and gas quality stability is a pre-requisite for all network (end) user operations.** In the Explanatory Memorandum /1A/ the importance of the gas quality is further explained “*Differences in gas quality parameters and in the volume of hydrogen blended in the natural gas system can affect the design of gas infrastructure, end-user applications and cross-border system interoperability, thus risk fragmenting the internal market. However, current gas quality rules are not fit to deal with future developments*”.

Articles 30(7) for the transmission and 35 for the distribution system operators /1A/ are regarding gas quality information referring to Articles 16 and 17 of Regulation EU 2015/703. Article 16 is stipulating *only a few parameters* namely WI (Wobbe Index) and gross calorific value to be mandatorily reported on an hourly basis by the transmission system operators. According to Article

17 additional short-term gas quality information *may* be reported to final customers with sensitive operational processes. But the **additional reporting is only of indicative quality and not mandatory** if national regulatory authority has not requested for this.

In Recital (5) of EU 2015/703 is the following text “*The provisions of this Regulation relating to gas quality should provide effective solutions without prejudice to the adoption of a European-wide standard for high-calorific gas as is being developed by CEN pursuant to the standardisation process under mandate M/400*”. Under mandate M/400 H-gas standard the EN 16726:2015 (the H-gas standard) is being revised to include additional gas parameters such as WI-range, etc. Articles 30(7) and 35 need to be revised in order to fulfil the future gas quality information need ambitions, current reference to Articles 16 and 17 of EU 2015/703 is **not fit to deal with future developments in gas quality**. Dto. the text in Annex 1, section 3, chapter 3.3, point 4 needs to be revised to be in line with gas quality aspects set in articles 30(7) and 35. See sources /3/ and /4/ for more information. According to Article 53(1) Commission is empowered to adopt implementing acts establishing network codes for amongst all short-and long term gas quality monitoring information provision data exchange, etc. According to Article 53(3) Commission shall every three years establish a priority list identifying areas to be included in the development of network codes. I.e.by setting new network codes speeding up the CEN 16726 revision process and asking for inclusion of gas quality parameters of this standard for the gas quality reporting EU could establish a gas standard fit to deal with future development. Real time monitoring of the gas parameters is preferred in order to enable/secure optimised performance of end user appliances.

3. Sources

/1A/ Proposal for a regulation .. on the internal markets for renewable and natural gases and for hydrogen (recast), 15.12.2022, at web: https://eur-lex.europa.eu/resource.html?uri=cellar:0c903f5a-5d8b-11ec-9c6c-01aa75ed71a1.0001.02/DOC_1&format=PDF

/1B/ Annex at web: https://eur-lex.europa.eu/resource.html?uri=cellar:0c903f5a-5d8b-11ec-9c6c-01aa75ed71a1.0001.02/DOC_2&format=PDF

/2/ EU Regulation 2015/703 at web <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R0703&from=EN>

/3/ EUROMOT Position paper on “Proposal for a Regulation on the Internal markets for Renewable and Natural Gases and for hydrogen 2021/0424(COD)”, 04.10 2022, at web: https://www.euromot.eu/wp-content/uploads/2022/11/2021_0424_COD-EUROMOT-Position-Gas-Regulation-Rev-2022-10.pdf

/4/ EUROMOT POSITION EUROMOT REVISION OF EU RULES ON GAS MARKET ACCESS – EUROMOT POSITION ON GAS QUALITY REQUIREMENTS, June 2021 at web: https://www.euromot.eu/wp-content/uploads/2021/06/EU-gas-legislation-revision_EUROMOT-position-on-gas-quality-requirements_FINAL_16-June-2021.pdf



EUROMOT aisbl

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EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

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THIS IS EUROMOT

Founded in 1991, EUROMOT is the European association of internal combustion engine and alternative powertrain manufacturers. Representing the key global manufacturers for over 30 years, we provide an invaluable centre of expertise for businesses, authorities, regulators and public stakeholders worldwide. We are the industry's united voice to drive smart and gold standard global regulations for sustainable mobile machinery and stationary applications, helping the manufacturers shape innovations and markets for the future.

With an ecosystem of working groups spanning current and future power and mobility systems, we facilitate cross-fertilisation of innovation across industries. EUROMOT provides an essential gateway to the EU Single Market and forms a bridge for the transition from traditional to alternative energy and advanced powertrains.

Since our foundation, we have been facilitating ever increasing environmentally friendly and sustainable products as well as the decarbonization of our sector and its transition to low/zero-carbon emissions and renewable energy. With a membership encompassing all major ICE and alternative powertrain manufacturers and well-established connections to regulators, EUROMOT is uniquely positioned to decarbonise entire industries from agriculture to construction and from land-based to marine alongside stationary power for heat and electricity.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

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