

EUROMOT POSITION

REVISION OF EU RULES ON GAS MARKET ACCESS – EU COMMISSION ROADMAP

08 March 2021

EUROMOT very much supports the EU ambition for a rapid reduction of greenhouse gas emissions and of the unabated use of fossil fuels, and for a progressive increase in the market penetration of low-carbon gases. As underlined in our [recent paper on Taxonomy](#), our new engines are more and more ready to run on hydrogen (having a target of 20% vol Hydrogen today and 100% vol in 2030) and/or other low-carbon/decarbonised gases, depending on EU technical specifications on gas quality (see below) and on the availability of such gases.

We also agree that a direct electrification of the heating of buildings and processes with by nature very effective heat pumps can save a considerable amount of primary energy and consequently reduce the connected emissions.

Large-scale electrification will make the society and economy increasingly depending on an uninterrupted electric power supply. With a substantial fraction of electricity coming from solar panels and wind turbines, it is of crucial importance that the power grid stays stable with a maximum reliability. Batteries alone cannot provide the task of enabling by-nature fluctuating power sources. There is evidence that **distributed generation, often in combination with cogeneration and district heating, is excellently capable of performing this renewable-enabling task**. EUROMOT has highlighted such a key function of gas-fired engines in a number of papers: for example, when commenting on the EU Taxonomy (see link above) and [on the EU Energy System Integration Strategy](#).

Although EUROMOT members can design and tune their products for running on any kind of gas, be it renewable, fossil or low-carbon, **a good engine performance requires a suitable and close to constant gas quality**. Indeed, as mentioned in our paper on the Energy System Integration Strategy, abrupt and deep changes in fuel composition will jeopardize engines' performance, thus undermining key EU policy objectives such as safety, exhaust emissions reduction and energy efficiency: a concept which applies not only to renewable-enabling and grid-stabilising power plants

as described above, but to all engine sectors and applications. More particularly, in the same paper we make our proposals concerning the values of some key quality parameters of the gas delivered to consumers (namely: the Wobbe Index, its rate of change, the Methane Number and the Sulphur content of gas).

Such a close to constant gas quality over an extended time is economically and technically possible without jeopardising the security of gas supply. Therefore, adequate legislation to this end can and should be harmonized and put in place at the EU level.

For the same reasons, **we recommend aiming for a separate hydrogen grid** to ensure an optimum and adequate use of such a costly and valuable energy carrier: because of the considerably deviating properties of hydrogen compared to methane, blending (high) fractions of hydrogen in gas will result in a poor gas quality, especially when the hydrogen fraction does vary.

To sum up:

1. Reciprocating engine-based electricity generators have a proven capability to enable a fast large-scale integration of renewable electricity.
2. For an adequate performance, these engines need a close to constant good and stable gas quality over an extended time.
3. It is technically and economically possible to ensure a narrow gas quality range without jeopardising the security of supply (e.g. *US FERC Interim Guidelines*) while facilitating cross-border transfers of gas.
4. The EU should develop legislation aiming at an optimum gas quality, taking into considerations technical expertise and concerns of all actors of the gas value chain.

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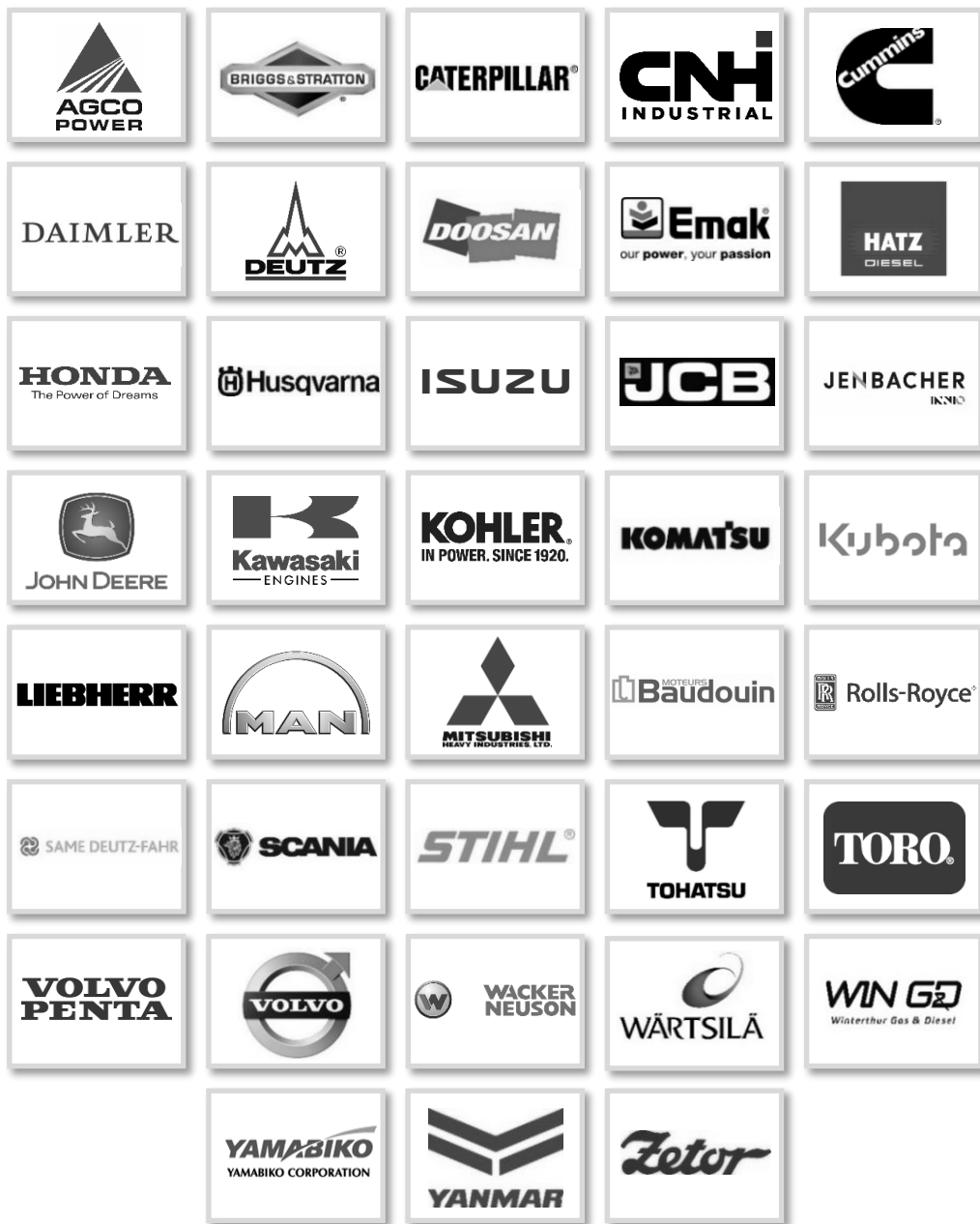
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