


ACER

 Agency for the Cooperation
of Energy Regulators

Gas Quality Standardisation in the energy transition

Relevant Regulatory Framework

ACER Interoperability Task Force

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Survey among NRAs indicates that generally competences concerning the oversight and setting of safety targets and ranges with regard to gas quality in general and in particular with regard to end user gas applications are not within the regulatory scope of NRAs.

- » Legal and technical framework differs across EU.
- » In some Member States ministries or other public authorities are responsible for specifying gas quality requirements.
- » In some cases special associations like DVGW in Germany or ÖVGW in Austria are mandated to provide regulations on gas quality standardisation or end-user gas applications.

Establishment of a platform including all competent authorities may be useful in order to get the full regulatory oversight.

If cross-border trade restrictions due to gas quality differences occur, existing legislation (Art. 15 NC INT) provides guidance how to manage it:

- » TSO shall cooperate to avoid restrictions to cross-border trade due to gas quality differences.
- » If NRAs recognise restrictions to cross-border trade, they may require the TSOs to work out solutions pursuant to Art. 15 (2) (a) to (e), including:
 - Develop technically feasible options;
 - Perform CBA to define efficient solutions;
 - Conduct public consultation;
 - Submit a joint proposal to NRAs for approval and other competent authorities for information including a timeframe for implementation.

NRAs may adopt coordinated decision based on mutual agreement about the solution proposals from the TSOs.

According to the implementation monitoring reports of the NC INT from ACER* and ENTSOG, cross border trade restrictions due to gas quality differences do not exist at the moment.**

- » NRAs did not discover any restrictions.
- » No stakeholder reported a current or relevant future barrier.
- » No TSO reported an activation of Art. 15 NC INT

Different gas qualities do not result in cross-border trade restrictions per se.

https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Publication/First%20ACER%20Implementation%20Monitoring%20Report%20of%20the%20Network%20Code%20on%20Interoperability%20and%20Data%20Exchange.pdf

https://www.entsog.eu/sites/default/files/entsog-migration/publications/Implementation%20Monitoring/2018/int/entsog_INT_NC_IMR_2017_web.pdf

Before establishing a new formal process for sensitive end-consumers further assessment is needed:

- NRAs recognise that with growing share of renewable gases regional variabilities might increase.
- The extent of the problem is not clear yet.
 - » A map from CEN illustrating the affected regions would be useful.
- How are existing gas quality variabilities (different H-Gas sources, L-Gas, biogas and H2 blending etc.) handled in the Member States?
 - » How much does it cost?
 - » Who is paying?
 - » Is a change in EU legislation required?
- How will a potential process take national / regional specifications into account?
- Considering the legal/technical competences are NRAs the appropriate authorities to step in in this regard?

Thank you for your attention!