

Dr Kiara Zennaro, Head of Biogas
Association for Renewable Energy and Clean Technology (REA)

Your letter dated July 2020	Your reference IGEM Standard for Gas Quality	Our reference GQWG consultation	Date 22 December 2020
--------------------------------	--	------------------------------------	--------------------------

Dear Dr Zennaro,

Re: IGEM Consultation on updating Schedule 3 of GS(M)R

Thank you for responding to the IGEM consultation on updating the gas quality specification in Schedule 3 of the *Gas Safety (Management) Regulations (GS(M)R)*. This specification is in place to ensure the safe management of gas conveyed to customers, particularly domestic consumers, in Great Britain.

The IGEM Gas Quality Working Group has deliberated over about 200 comments and suggestions from the industry on the proposed new standard IGEM/GL/10 *Gas Quality Specification for Conveyance of Group H Gases of the Second Gas Family* and the associated Evidence Report *A Proposed New IGEM Gas Quality Standard – A Key Step on the Pathway to Net Zero Emissions*.

After due consideration, the Working Group has agreed to recommend the following gas quality specification changes to the Health and Safety Executive (HSE) for a detailed economic impact assessment:

- To extend the Wobbe Index range to 46.5 - 52.85 MJ/m³ at UK metric standard conditions. This brings the current emergency limits into the normal range.
- To replace the current Incomplete Combustion Factor and Sooting Index interchangeability parameters with a maximum relative density of 0.700 at UK metric standard conditions.
- To increase the permissible oxygen content to a maximum of 1 mol% for gas pipelines operating up to pressures of 38 barg. At higher pressures the existing limit of 0.2 mol% will remain.
- To remove Schedule 3 of the GS(M)R from statute and replace it with an IGEM standard, IGEM/GL/10. The HSE will retain oversight and power of veto over any further changes to the gas specification.

Institution of Gas Engineers & Managers
IGEM House, 26 & 28 High Street
Kegworth, Derbyshire DE74 2DA

t: +44 (0)1509 678 150
e: general@igem.org.uk
www.igem.org.uk

Registered Charity No. 214011



The Working Group has noted your concerns and feedback. The potential commercial and operational impacts of the gas quality changes on industrial and commercial users is acknowledged and these comments will be passed to the HSE for the economic impact assessment.

I include a summary of responses from Working Group meetings to address your comments and concerns:

- **Wider range of calorific value and fair billing** - the link between increased range of Wobbe Index and a potential increase in the range of calorific value is acknowledged and has previously been discussed by the Working Group. Cadent's *Future Billing Methodology* project is investigating a fairer billing system for consumers and the project will finish in April 2021; the final recommendations are not yet available. At this time, it is more likely that the billing systems and processes, rather than *Gas (Calculation of Thermal Energy) Regulations*, will need to be revised. Your request that the change in the gas specification should happen at the same time as changes to the Flow Weighted Average Calorific Value have been noted.
- **Biomethane plant start up exemption from FWACV** – your request for ENA and Ofgem to consider a 15-minute exemption from the Flow Weighted Average Calorific Value during start up of biomethane plants has been noted but it is outside the scope of this consultation.

Following this IGEM consultation, the HSE will carry out an impact assessment to investigate both safety, operational and commercial considerations. If the HSE is satisfied with the outcome, the Executive will support the appropriate Minister in the UK Parliament to present an amendment to the current Regulations.

IGEM welcomes your continued input to ensure the future flexibility and viability of the gas industry in Great Britain.

Yours sincerely,



Angus McIntosh
Chair of the Gas Quality Working Group

