

Fluxys Belgium - Market Consultation 54 - Changes in Regulatory Documents – Febeliec reaction

Febeliec thanks Fluxys for the opportunity to comment on the proposed changes to the regulatory documents.

On the injection of hydrogen into the natural gas grid and the adaptation of the gas quality specifications with an upper limit of 2% of H₂, Febeliec would like to formulate the following comments:

- Fluxys does not justify these proposals nor provides any longer-term perspective for this evolution. It is not clear whether these proposals aim at a one-off increase of the allowed H₂-content in the grid, or if it is the intention to further increase this upper limit in the coming years. Febeliec strongly invites Fluxys to provide a clear and comprehensive motivation of these proposals, including the expected sources of hydrogen injection in the near future, the longer-term perspectives of this evolution and the level of harmonization of the proposals with neighboring TSO's.
- To the extent that H₂ is to be part of the future fuel mix in a climate-neutral Europe, mixing it up with natural gas does not seem to be a step in the right direction. Though Febeliec recognizes the technical possibility to increase the hydrogen content of supplied natural gas, we invite Fluxys to provide a cost/benefit analysis of this solution, proving it offers a positive balance for society.
- As Febeliec mentioned several times in the past, more frequent variations and increased volatility of the natural gas composition are detrimental for the efficiency of several industrial processes. Febeliec invites Fluxys to indicate whether the proposed changes could increase the volatility of the gas composition. Furthermore, Febeliec invites Fluxys to provide more detail on the potential impact of this proposal on the gas specification parameters (Wobbe-index, methane content, CO₂ content, inter gases, ...).
- Finally, Febeliec would like to mention the potential impact of higher hydrogen shares in the natural gas used for electricity production on the turbines' efficiency. Febeliec wonders if this impact has been thoroughly assessed by Fluxys.

On the proposed modifications to the H_àL conversion service and L/H capacity switch service, Febeliec insists on the need to maintain existing flexibility services for the remaining L-gas users until the national conversion program to H-gas has been fully completed.

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on behalf of Febeliec

Federation of Belgian Industrial Energy Consumers

Febeliec represents the industrial consumers of electricity and natural gas in Belgium.

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Febeliec represents industrial energy consumers in Belgium. It strives for competitive prices for electricity and natural gas for industrial activities in Belgium, and for an increased security of energy supply. Febeliec has as members 5 business associations (Chemistry and life sciences, Glass, pulp & paper and cardboard, Mining, Textiles and wood processing, Brick) and 38 companies (Air Liquide, Air Products, Aperam, ArcelorMittal, Arlanxeo Belgium, Aurubis Belgium, BASF Antwerpen, Bayer Agriculture, Bekaert, Borealis, Brussels Airport Company, Covestro, Dow Belgium, Evonik Antwerpen, Glaxosmithkline Biologicals, Google, Ineos, Infrabel, Inovyn Belgium, Kaneka Belgium, Kronos, Lanxess, Nippon Gases Belgium, Nippon Shokubai Europe, NLMK Belgium, Nyrstar Belgium, Oleon, Proxiums, Recticel, Sol, Tessenderlo Group, Thy-Marcinelle, Total Petrochemicals & Refining, UCB Pharma, Umicore, Unilin, Vynova and Yara). Together they represent over 80% of industrial electricity and natural gas consumption in Belgium and some 230.000 industrial jobs.