

Febeleriec reaction to Fluxys Belgium Market Consultation 66: Update for the injection of compatible and non compatible gases in the methane network

([https://www.fluxys.com/en/news/fluxys-belgium/2023/231117\\_consultation-66\\_changes\\_in\\_act\\_sta\\_and\\_tp](https://www.fluxys.com/en/news/fluxys-belgium/2023/231117_consultation-66_changes_in_act_sta_and_tp)).

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

- As Febeleriec 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. Febeleriec invites Fluxys to indicate whether the proposed changes could increase the volatility of the gas composition.
- To the extent that H<sub>2</sub> 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 Febeleriec 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. Febeleriec would like to mention the potential impact of higher hydrogen shares in the natural gas used for electricity production on the turbines' efficiency.
- As for the proposed changes to allow the injection of new gasses (i.e. biomethane) in the natural gas transmission grid, Febeleriec refers to its answer to Market Consultation 47, and more specifically to the potential impact of the gas composition and quality on industrial processes, as well as on the importance of the predictability and speed of change of gas quality and composition for the integrity of industrial processes using natural gas. Febeleriec strongly advises Fluxys
  - to continue to strive for a stable and predictable gas quality and composition in the whole of its grid, acknowledging that current gas quality is well within the legal specs;
  - to thoroughly consult grid users potentially impacted by the injection of "new gases" every time a new producer requests injection into the Fluxys grid.

Febeleriec also invites Fluxys to provide feedback on the possible impact on industrial processes (especially for gas used as a raw material) of an increased share of argon in the gas flows as a consequence of biogas injection in the gas grid (see market consultation in the Netherlands on this issue, <https://www.internetconsultatie.nl/gaskwaliteit/b1>).