

<u>Febeliec reaction to Fluxys Belgium Market Consultation 66: Update for the injection of compatible and non</u> <u>compatible gases in the methane network</u> (<u>https://www.fluxys.com/en/news/fluxys-belgium/2023/231117_consultation-</u> <u>66_changes_in_act_sta_and_tp</u>).

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

- 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.
- 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. Febeliec 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, Febeliec 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. Febeliec strongly advices 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.

Febeliec 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, <u>https://www.internetconsultatie.nl/gaskwaliteit/b1</u>).

Febeliec represents corporate energy consumers in Belgium for whom energy is a significant component of production costs and a key factor of competitiveness. Febeliec strives for competitive prices for electricity and natural gas for its members, and for more security of energy supply in the context of the energy transition. Febeliec's members are 5 sector federations and more than 40 companies from various sectors (chemistry and life sciences, petroleum products, glass, pulp & paper and cardboard, mining, textiles and wood processing, brick, non-ferrous metals, steel, transportation, construction materials, data centers, telecommunications). Together they represent some 80% of industrial electricity and natural gas consumption in Belgium and 225.000 jobs (<u>www.febeliec.be</u>).