



Mr. Dermot Lynch  
Commission for Energy Regulation,  
The Exchange  
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18th March 2009

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**Subject: Draft Decision Paper**

**Regulation of Gas Installers with Respect to Safety**

**Definition for the Scope of Gas Works**

Dear Mr. Lynch,

Please find enclosed comments on the above from the Irish Liquefied Petroleum Gas Association. We would appreciate the opportunity to discuss these in detail with you at the earliest possible opportunity.

Yours sincerely

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Ed Mc Donnell  
Secretary



**COMMISSION FOR ENERGY REGULATION**

**REGULATION OF GAS INSTALLERS WITH RESPECT TO SAFETY**

**DEFINITION FOR THE SCOPE OF GAS WORKS**

**DRAFT DECISION PAPER**

**SUBMISSION BY IRISH LIQUEFIED PETROLEUM GAS ASSOCIATION**

**18<sup>TH</sup> MARCH 2009**



### **Definition for the Scope of Gas Works**

- 1) The ILPGA has a concern that the "potential maximum scope of gas works" only includes natural gas (Section 4.1).

The ILPGA will be disappointed if it now is not the intention to include LPG at a later date.

This issue has previously been raised (in relation to the CER Consultation Paper on "Safety Regulation of the Liquefied Petroleum Gas Industry in Ireland").

We noted the CER intention in our response to that paper, when we stated:

"This leads us to the one major concern that we do have, which is the possibility of a delay regarding the introduction of the Installer Registration Scheme into the LPG industry.

We are fully in agreement that this is the area most critical in terms of public safety and should be addressed in an urgent fashion, independent of any further legislative changes. We note that the C.E.R. is suggesting a possible approach to achieve this in section 3.3.2."

From the above it seems clear that it is fully intended that the scope is to include L.P. Gas. However, the industry seeks confirmation of this, since the CER Decision Paper on the LPG Industry has not yet been issued.

- 2) We note that there are only three types of activity given in the list of exceptions in section 5.2.2.  
These three exceptions were included in the list of exceptions put forward by GTSC TC2 in September 2007.



However, there were a number of other activities listed then which the ILPGA would wish to be added to your list, as follows:

- a) Work on the point of delivery and upstream of the point of delivery.
- b) Work on gas fittings for the supply of gas for automotive use.
- c) Any work that can be effected by a person without the use of a tool.
- d) Work on a single appliance LPG installation (excluding repair or maintenance) without fixed pipework, achieved by a flexible connector from an adjacent LPG storage cylinder.
- e) Connection or replacement of a flexible connector connecting a refillable cylinder to installation pipework.

Note 1: The exceptions c, d and e were intended to address the use of regulators/cylinders (LPG) and bayonet connections (mainly Natural Gas). It may have been the intention of the CER to address these issues within the body of the document by virtue of the definition of gas works. However, perhaps the inclusion in a listing gives further clarity.

Note 2: It is suggested that the appropriate listing should also appear in section 5.2.1

- 3) There was one other exception in the GTSC TC2 list. This was a reference to industrial premises (work on gas fittings carried out in industrial premises where an industrial process is carried out).

As the CER has indicated an intention that work on domestic type appliances in industrial premises is to come within the scope of the legislation, it is accepted that this exception is no longer appropriate.

We would be available to discuss these further, if you wish.