

NSAI response to CER consultation document CER/11/22.

The following comments are submitted by the NSAI Consultative Committee, Gas Technical Standards Committee (GTSC), Technical Committee TC2.

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Appendix A – List of Substantive Questions

Question/ Proposal	Yes	No	Comments
<p>Q1. Do you agree with the proposed definitions in Section 3.2 for;</p> <p>-Domestic Customers (fixed and mobile),</p> <p>-Commercial Customers (fixed and mobile); and,</p> <p>-Industrial LPG Customers.</p>	<p>Yes, see cmt</p> <p>Yes</p> <p>Yes</p>		<p>To capture all gas appliances suggested amendment to wording highlighted in italics:</p> <p>"Domestic LPG customers' are defined as those end users who use LPG on a permanent, temporary or seasonal basis, for residential purposes such as space heating, cooking and hot water, utilising standardised and gas burning appliances approved under the requirements of the G.A.D17., <i>as well as gas appliances manufactured before the introduction of the GAD.</i> Domestic LPG customers use LPG for residential purposes in fixed and mobile residential premises, as follows:"</p>
<p>Q2. Do you agree with the CER's analysis of the policy considerations in Section 4?</p>	<p>Yes</p>		

<p>Q3. Do you agree with the CER's proposals set out in Section 5?</p> <p>Option A: Minimum Scope of Gas Works with respect to Domestic LPG Customers</p> <p>Option B: Intermediate Scope of Gas Works with respect to Commercial LPG Customers</p> <p>Option C: Maximum Scope of Gas Works with respect to Industrial LPG Customers.</p>		<p>No</p>	<p>We agree in general but would propose the following addition:</p> <p>Section 5.1 The welding of pipework prior to admission of gas, should be added to the list of exemptions.</p>
	Yes		
	Yes		

Further comments:	
Comment and clause reference:	Proposed change to text
General comment	<p>Personnel should be exempt from registration while carrying out network operations including emergency response on behalf of a network operator/LPG undertaking.</p> <p>It is the responsibility of the network operator/LPG undertaking to ensure that its personnel have the relevant competency and training to carry out the assigned operations.</p>
<p>Related documents:</p> <p>Add I.S. 813 and I.S. 820 to the related documents list.</p>	<p>I.S. 813, <i>Domestic gas installations</i></p> <p>I.S. 820, <i>Non-domestic gas installations</i></p>

Further comments (contd):	
Comment and clause reference:	Proposed change to text
3.2.1.2	<p>While we support the concept of including boats, caravans, mobile homes and LAVs we see issues around traceability of certification of the gas works.</p> <p>As there is no registration, to our knowledge, of mobile accommodate the traceability of the installations is impractical to record.</p> <p>TC2 would be happy to participate in any meetings CER sees fit to organise with the industry sectors affected to clarify the logistics of including mobile accommodation inside the scope of this document.</p>
<p>3.2.1.2 Footnote 18</p> <p>I.S. EN 1949 is not freely available and must be purchased. The definition for LAV should be provided in CER publication which is freely available.</p>	<p>I.S. EN 1949 does not include a definition for LAV.</p> <p>I.S. EN 1949 provides the following definition for the term leisure accommodation vehicle:</p> <p>3.1 leisure accommodation vehicle unit of living accommodation for temporary or seasonal occupation that may meet requirements for construction and use of road vehicles</p> <p>Provide the definition in the footnote or main text. Alternatively reference the correct term included in I.S. EN 1949.</p>
<p>4.2.1 Last paragraph</p>	<p>Use the commonly used reference to carbon monoxide throughout the document</p> <p>Carbon Monoxide (CO)</p>

Further comments (contd):	
Comment and clause reference:	Proposed change to text
<p>4.4.2 3rd bullet</p> <p>Please utilise the correct wording when referring to Irish Standards. Deleted text has been struck through and new text is highlighted by italics.</p>	<p>There is a Domestic Gas Installation Standard (I.S. 81322) which <i>Irish Standard Specification, I.S. 813²²</i>, covers the installation <i>requirements of Natural Gas and LPG</i> of LPG fittings in a domestic setting. Similarly, there are applicable Irish <i>Standards</i> which cover the installation of LPG fittings in caravans, mobile homes, LAV"s etc. (I.S. EN 1949) and boats etc. (I.S. EN ISO 10239). Again these <i>Irish Standards</i> also lend themselves to the development of a relatively simple competence assessment process in order to satisfy that an individual is competent to undertake the <i>gas work</i> in accordance with the provisions of the standard.</p>
<p>4.4.2 Footnote 22</p> <p>22 - Reference to I.S. 813 should be worded as follows:</p>	<p>Irish Standard I.S. 813 – <i>Domestic gas installations</i> published under the authority of the National Standards Authority of Ireland which may be revised and amended from time to time</p>
<p>4.4.3 3rd bullet</p> <p>Please utilise the correct wording when referring to Irish Standards. Deleted text has been struck through and new text is highlighted by italics.</p>	<p>There is a Non-Domestic Gas Installation Standard (I.S. 82023) which <i>The Irish Standard I.S. 820</i> covers the installation <i>requirements of Natural Gas and LPG</i> fittings in a non-domestic setting, more specifically commercial premises.</p>
<p>4.4.3 Footnote 23</p> <p>23 - Reference to I.S. 820 should be worded as follows:</p>	<p>Irish Standard I.S. 820 – <i>Non-domestic gas installations</i> published under the authority of the National Standards Authority of Ireland which may be revised and amended from time to time</p>
<p>5.2 Footnote 52</p> <p>Reference to I.S. 820 should be worded as follows:</p>	<p>Irish Standard I.S. 820 – <i>Non-domestic gas installations</i> published under the authority of the National Standards Authority of Ireland which may be revised and amended from time to time</p>

