6 March 2014

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See Distribution

GAS ENERGY AUSTRALIA SUBMISSION

NATIONAL MEASUREMENT INSTITUTE

OIML R117-2: DYNAMIC MEASURING SYSTEMS FOR LIQUIDS OTHER THAN WATER

Dear Alex,

Gas Energy Australia would like to thank you for the opportunity to comment on the proposed revision of OMIL R117 - 2 (2CD) *Dynamic measuring systems for liquids other than water* (R117-2) and the time you and your team has taken consulting with our members.

Gas Energy Australia is the national peak body which represents the bulk of the downstream gaseous fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain, including production, fuel marketers, equipment manufacturers, vehicle converters, and the providers of services to the industry.

Following a comprehensive review of the document, Gas Energy Australia is concerned that there is a move to incorporate cryogenic liquids, specifically Liquefied Natural Gas (LNG) into a future version of R117 Part 1 Metrological and Technical requirements (R117-1) and R117 Part 2 Metrological Controls and Performance Tests (R117-2).

Gas Energy Australia re-enforces earlier comments to the National Measurement Institute in the Gas Energy Australia Submission – *National Measurement Institute – Cryogenic Measuring Devices and Systems* dated 20 September 2013 attached at Enclosure 1. LNG is classified as a **cryogenic** liquid. Its physical properties and characteristics should be included in a revised version of R81 Dynamic measuring devices and systems for cryogenic liquids

Gas Energy Australia is also concerned that there appears to be changes in R117-2 (Metrological Controls and Performance Tests) which have not been defined in R117-1 (Metrological and Technical requirements)

which contains the metrological and technical requirements. This specifically relates to definitions of "highest wear" as a trigger for an Endurance Test outlined in section 5.4 of R117-2.

Gas Energy Australia members and associates have a significant interest in the delivery of correct measure of LNG and LPG. It is within this context that the Association is responding to your request for comment and also looking forward to more ongoing dialogue and engagement in these areas.

1. LNG should be included in R81

The revision document is ambiguous and creates confusion. The document specifically references cryogenic liquids (Section 1.2). Liquefied Natural Gas (LNG) is classified as a cryogenic liquid under the current R81 standard.

The revision document states in section 1.2 that dynamic measuring devices and systems for cryogenic liquids (OIML R 81), are excluded from this standard. This is contradicted by the item in R-117-2 Annex list which clearly states - LNG to be added as an annex later.

Recommendation: LNG is a cryogenic liquid and should be included in a revision of R81.

2. Changes to endurance tests

Gas Energy Australia notes that the explanatory note on page 2 of the revised R117-2 contains the following; *Some newly developed items in this document (R117-2), if approved, will necessitate an amendment of some of the corresponding "requirements" sections of R117-1*

This is evidenced in the changes made to section 5.4 Endurance Tests. A test has been introduced without the scope and need being identified in the requirements section of R117-1. Practically this would include defining variables for determining which models require Endurance Tests including defining "sizes" and "highest wear" in a revision of R117-1, however the need must be determined before a test methodology is considered

Recommendation: That all newly developed items in R117-2 that would require a revision of R117-1 should be removed as a matter of drafting procedure and that they should first be considered for inclusion as Metrological and Technical requirements before they are mandated as Metrological Controls and Performance Tests.

3. Other comments

Gas Energy Australia has provided some comments specifically against some sections of the draft which are included in Gas Energy Australia OIML R117 Stakeholder Comments Form 5 March attached at Enclosure 2 in the format requested by the National Measurement Institute

4. Summary of Recommendations

Metrology is a key consideration in the future development and growth of the LNG industry, and the continuing productivity of the LPG industry. Industry cannot progress without a robust metrology standard.

Gas Energy Australia recommends that;

a. LNG as a cryogenic liquid should be included in R81 Dynamic measuring devices and systems for cryogenic liquids, and

b. all "newly developed" items in R117-2 that would require a revision of R117-1 be removed.

For your earliest consideration and advice.

Yours sincerely

Mike Carmody
Director and Chief Executive Officer
Gas Energy Australia

Enclosures:
1. Gas Energy Australia Submission – National Measurement Institute – Cryogenic Measuring Devices and Systems dated 20 September 2013
2. Gas Energy Australia OIML R117 Stakeholder Comments Form 5 March

Distribution: Gas Energy Australia Safety Standards and Technology Committee

For information:

Gas Energy Australia State Representatives
Gas Energy Australia Technical Committees – Chairpersons
Gas Energy Australia Secretariat