



FW: Consultation on EGCC Scheme document - adding bottled LPG

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Cc: "mark.wogan@mbie.govt.nz" <mark.wogan@mbie.govt.nz>

James

Mark Wogan has referred your consultation on the addition of bottled LPG to the EGCC scheme to me for comment.

I found my comment did not suit the formatting of the standard return, hence this comment is by way of email.

Energy Safety has no objection to the addition of 'Bottled LPG' to the EGCC Scheme, and makes no comment on the arrangements for the Scheme itself. However, noting the definitions of Gas and Bottled LPG referred to in the Scheme rules, Energy Safety considers there is a risk the Scheme may not apply as intended.

The definition of Gas on page 7 includes natural gas meeting NZS 5442 and Bottled LPG (defined on page 6), which refers to LPG in bottles. Using these definitions excludes LPG reticulated through distribution networks and in other ways may not provide for the coverage expected.

The use of the term Bottles or Bottled to refer to containers of LPG is not consistent with terminology found in the regulatory environment (specifically in the HSNO Act and Gas Act, and related regulations). LPG is supplied to consumers through:

- reticulation systems – similar to natural gas reticulation
- bulk tanks on consumer premises – refilled on site
- cylinders or containers – which may be exchanged or filled on site or (in the case of smaller cylinders) exchanged or refilled at filling stations or other specialist suppliers
- small generally single use containers (sometimes referred to as cartridges) – purchased at general retail outlets.

Unless the terminology is consistent there is a risk that both consumers and participants will be confused as to the application of the Scheme.

Regards

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TECHNICAL OFFICER

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