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# Supplying bio-compressed natural gas to the transport industry in Ireland: is the current regulatory framework facilitating or hindering development?

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# **Manuscript Details**

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#### Abstract

European Union (EU) legislation in the form of the Renewable Energy Directive 2009/28/EC and the Deployment of the Alternative Fuels Infrastructure Directive 2014/94/EC have placed mandatory requirements on Member States to deliver sustainable forms of alternative transport infrastructure in order to reduce greenhouse gas emissions in the transport sector. However, there is currently little or no refuelling infrastructure to support the development of an alternative transport fuel market for compressed natural gas and its renewable form biomethane in a number of EU Member States. Primarily focussing on a combination of biomethane and compressed natural gas (bio-CNG), this paper analyses the key considerations to develop a strategic infrastructure framework for bio-CNG and defines the criteria for the placement of public access refuelling stations in order to satisfy legislative requirements, commercial considerations, strategic placement and natural gas network infrastructure utilisation. This paper maps a strategic infrastructure framework for bio-CNG could be provided for Ireland as a template and for other Member States with similar infrastructure and requirements to follow. The framework includes the provision of 22 bio-CNG installations in strategic locations across the country.

Keywords	compressed natural gas, biomethane, strategic development, transport policy
Taxonomy	Environmental Technology, European Energy Policy, National Energy Policy, Renewable Energy Policy, Natural Gas Vehicles, Transport
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## **Research Data Related to this Submission**

There are no linked research data sets for this submission. The following reason is given: Data will be made available on request

Cork Institute of Technology Rossa Avenue Bishopstown Cork 09<sup>th</sup> November, 2017

## Re: Article submission to the Environmental Science & Policy journal

Dear Editor,

Please find attached my Full Length Article for review titled 'Introducing gaseous transport fuel to Ireland: A strategic infrastructure framework'.

This paper investigates the infrastructure framework required to develop a gaseous transport industry (through compressed natural gas and biomethane – bio-CNG) in Ireland. The Article focuses on current European/Irish transport and renewable policy, the natural gas industry and determines the associated policy requirements to develop such an infrastructure framework for supplying bio-CNG including: transport legislation, natural gas infrastructure, bio-CNG technology, vehicle refuelling requirements and renewable biomethane interaction. The paper then devises an infrastructure framework for gaseous transport fuel utilisation for Ireland that can be used as a template for other European countries.

With environmental protection, rising fuel prices, energy efficiency and sustainable development becoming increasing important issues in Europe, this paper offers a relevant solution to address the key concerns facing the transport industry, policy makers and investors through strategic policy recommendations. This topic is of significant relevance to Ireland and other European countries in order to achieve the significant environmental, renewable source and alternative fuel infrastructure targets in transport.

I hope you enjoy this paper and feel that it is at an acceptable standard for your esteemed journal.

Best regards,

Daniel Goulding

- Title of paper: Introducing gaseous transport fuel to Ireland: A strategic infrastructure
   framework
- Authors: D Goulding <sup>(1) (2), (\*)</sup>, D Fitzpatrick <sup>(2)</sup>, R O'Connor <sup>(2)</sup>, JD Browne <sup>(2)</sup>, NM Power <sup>(1)</sup>
- 5 Keywords: compressed natural gas, biomethane, strategic development, transport policy
- 6

7 Abstract: European Union (EU) legislation in the form of the Renewable Energy Directive 8 2009/28/EC and the Deployment of the Alternative Fuels Infrastructure Directive 2014/94/EC 9 have placed mandatory requirements on Member States to deliver sustainable forms of alternative transport infrastructure in order to reduce greenhouse gas emissions in the transport 10 11 sector. However, there is currently little or no refuelling infrastructure to support the 12 development of an alternative transport fuel market for compressed natural gas and its 13 renewable form biomethane in a number of EU Member States. Primarily focussing on a 14 combination of biomethane and compressed natural gas (bio-CNG), this paper analyses the key 15 considerations to develop a strategic infrastructure framework for bio-CNG and defines the 16 criteria for the placement of public access refuelling stations in order to satisfy legislative 17 requirements, commercial considerations, strategic placement and natural gas network infrastructure utilisation. This paper maps a strategic infrastructure framework on which a 18 19 national public access refuelling network for bio-CNG could be provided for Ireland as a 20 template and for other Member States with similar infrastructure and requirements to follow. 21 The framework includes the provision of 22 bio-CNG installations in strategic locations across 22 the country.

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### 27 Introduction

#### 28 **1.1** Focus of paper

29 This paper aims to determine the infrastructure requirements for the public supply of gaseous 30 transport fuel in Ireland. Previous work published by the authors (which focussed on the 31 potential penetration of Compressed Natural Gas (CNG) blended with biomethane (bio-CNG<sup>1</sup>) 32 as a gaseous transport fuel sector in Ireland) proposed a bio-CNG production roadmap in which 11 anaerobic digestion (AD) facilities are developed to inject biomethane into the natural gas 33 34 network, thus meeting 1% of Ireland's renewables share in final transport energy demand 35 (RES-T) target by fuelling 14,000 commercial (buses, light goods vehicles and taxies) gaseous 36 vehicles (Goulding, et al, 2014). Other works by the authors derived a regulatory framework 37 to introduce the associated bio-CNG production roadmap into Ireland's transport sector 38 (Goulding et al, 2016).

39

40 However in Ireland, bio-CNG refuelling infrastructure is a key element of the industry which 41 is currently absent with no public bio-CNG refuelling stations in operation at present. The 42 establishment of bio-CNG refuelling infrastructure is an expensive investment when demand 43 is not yet strong enough (Kirk et al, 2014). This paper will complement the author's bio-CNG production roadmap and regulatory framework by focussing on the infrastructure requirements 44 45 for the supply of bio-CNG to public customers in Ireland and can act as a template for Member 46 States (MS) with similar infrastructure and bio-CNG requirements. Accordingly, the key objectives of this paper are as follows: 47

48

 Examine the key infrastructural requirements of European Union (EU) and national legislation in order for a bio-CNG transport market to succeed.

<sup>&</sup>lt;sup>1</sup> Bio-CNG will be considered the same term as CNG for the entirety of the paper.

Identify the criteria for the placement of public access refuelling stations through the
 review of successful bio-CNG transport industries in the EU while also considering
 legislative requirements, commercial considerations, strategic placement and natural
 gas network infrastructure utilisation.

Present a strategic bio-CNG infrastructure framework for Ireland by identifying

suitable public access refuelling station locations as per the author's defined criteria.

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## 57 1.2 Natural gas vehicles

58 Natural gas vehicles (NGVs) operate on CNG, its renewable form biomethane and blended 59 bio-CNG. From a global perspective, Pakistan is a country which has placed significant 60 emphasis on introducing CNG into its transport sector, experiencing the fastest growth in both 61 NGV utilisation and CNG station development for 2005 to 2014 (Khan and Yasmin, 2014). 62 Khan and Yasmin attributed the emergence of the CNG industry in Pakistan to friendly 63 government policies including; loans on soft terms to setup a CNG station, gas network 64 connection priority to CNG stations, liberal procedures for the granting of licenses to setup a 65 CNG stations and exemptions on import duty for CNG station equipment and vehicle 66 conversion equipment (Khan and Yasmin, 2014). The Government of China has also introduced aggressive policies to develop a CNG industry with over 3M NGVs currently in 67 68 operation by providing supports such as subsidies for NGVs, investment grants for CNG 69 infrastructure and research and development funding for NGV technology development (Li, 70 2015).

71

Biomethane has a comparable calorific value and similar chemical composition to natural gas (> 98% methane) and is produced in a process which converts organic matter into biogas in an oxygen free environment known as AD. Raw biogas must be upgraded to biomethane (> 98% methane) by removing carbon dioxide and other impurities in order to meet the minimum gross calorific value required by the natural gas network operator for injection. Although injection of biomethane into the natural gas network is common in many EU countries, there's a relatively wide range in gas quality specification between network operators. Sweden is currently the only EU country with a national standard for biomethane as a transport fuel (Svensson, 2014).

81

82 The ability of biomethane as a transport fuel is being overlooked by Ireland and other EU 83 countries as a renewable fuel which can help to achieve environmental targets for 2020 and 84 beyond. Well to wheel analysis conducted by *Bordelanne*, et al of biomethane produced from organic waste (90%) and CNG (10%) as a blended transport fuel in a passenger NGV generates 85 86 greenhouse gas emissions that are twice as low as an equivalent vehicle utilising gasoline over its operational life (Bordelanne, et al, 2011). The same analysis found that dedicated 87 88 biomethane as a transport fuel from energy crops reduces emissions by 76% while CNG on its 89 own as a transport fuel reduces emissions by 17% in comparison to gasoline (Bordelanne, et 90 al, 2011). Another study from *Shahraeeni et al* found that a 34% reduction of greenhouse gas 91 emissions may be achieved by replacing a diesel light goods vehicle fleets with an NGV 92 equivalent fleet over its operational life, saving \$30,000 per NGV in the process (Shahraeeni et al, 2015). A comparative analysis of operational bus fleets in Dublin, Ireland found that CO<sub>2</sub> 93 94 emissions were reduced 7% for CNG and a further 63% for bio-CNG in comparison to diesel (Ryan & Caulfield, 2010). Furthermore, a minimum decrease of 70% in all air pollutants was 95 96 observed (Ryan & Caulfield, 2010).

97

98 1.3 Current legislation

99 The EU Renewable Energy Directive 2009/28/EC (RED) has been the main policy mechanism
100 for MSs to develop renewable transport infrastructure to achieve a binding 10% RES-T by
101 2020 (EC, 2009a). However, the RED did not instruct MSs on how to achieve their RES-T

102 target. Ireland has chosen to achieve the mandatory RED target in the form of biofuels 103 (blending with petrol and diesel) and electric vehicles (EVs), with blended biofuels 104 contributing to the vast entirety of the 10% (DTTS, 2017). Although bio-CNG is not on the 105 radar for some MSs as a transport fuel to satisfy the RED, another EU Directive has been 106 introduced which places emphasis on bio-CNG as a transport fuel for the future in Europe.

107

The EU Directive for the Deployment of the Alternative Fuels Infrastructure 2014/94/EC (AFID) sets out requirements on establishing National Policy Frameworks (NPFs) for the market and infrastructural development of alternative fuels (including bio-CNG), including the implementation of common technical specifications (EC, 2014a). (EC, 2014b). Each MS will need to provide adequate recharging points for alternative fuels such as CNG, LNG, hydrogen and electricity in order to allow full circulation of alternative vehicles across the EU.

114

115 **1.4 Progress versus targets** 

116 The progress of delivering a 10% renewable transport energy share in the EU has been slower 117 than anticipated to date. In a 2014 report from the EU assessing the MS current RES-T progress 118 and along the trajectory towards the 2020 target suggests that after a solid initial start the ability 119 to achieve the RES-T 2020 target will require the removal of key regulatory barriers and 120 additional efforts from the EU and MSs (EC, 2014c). In 2014, the combined EU RES-T stood 121 at 5.9% (EC, 2014c). Furthermore, only 6 of the 28 MSs managed to achieve over 5.75%, while in 2012 Sweden was the only MS to pass the 2020 RES-T of 10% (EC, 2013; Eurostat, 2012). 122 In Ireland, the RES-T reached 3.3% in 2015 which is elevated to 5.7 % when weightings are 123 124 applied to biofuels from waste and second generation biofuels under the RED (SEAI, 2016). 125 Biomethane did not account for any of Ireland's RES-T share in 2015.

126

P5

In terms of NGV utilisation, the EU had 1.316M NGVs in operation utilising 3,408 refuelling stations in 2016 (NGVAE, 2017). However, 92% of these NGVs are operating in only four MSs; Italy (76%), Germany (7%), Bulgaria (5%) and Sweden (4%) (NGVAE, 2017). It is evident from Figure 1, that a significant number of MSs have little or no bio-CNG supply infrastructure in operation and require drastic action in order to achieve the AFID mandate.

132

~	Austria	170	7094	~	Lithuanic	2	
~	Austria	172	7.084		Liuluania	3	
	Belgium	78	5.365	~	Luxembourg	7	
	Bulgaria	125	69.820		Malta	-	
	Croatia	2	318	~	Netherlands	183	11
2	Cyprus	-	-	~	Poland	28	3
	Czech Republic	143	15.500		Portugal	19	
12	Denmark	15	327		Romania	1	1
~	Estonia	6	1504	1	Slovakia	11	1
1	Finland	29	2.375	<b>F</b>	Slovenia	4	
	France	60	14.548	$\approx$	Spain	66	5
	Germany	885	93.964	1	Sweden	173	54
	Greece	10	2.210		UK	38	
$\approx$	Hungary	10	6.314	1	EFTA Iceland	5	1
	Ireland	1	8		EFTA Norway	7	
	İtaly	1.186	1.001.614		EFTA Switzerland	141	12
$\approx$	Latvia	-	-				
					Total EU + EFTA	3.408	1.315
	Fi	igure 1: EU 1	NGV statistic	es for 2	016 (NGVAE,	2017)	

- 137 2.0 Material and methods
- 138

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136

139 2.1 Legislative requirements

140 The AFID mandates each MS to adopt a NPF for the development of the market as regards

141 alternative fuels in the transport sector and the deployment of the relevant infrastructure (EC,

142 2014a). In terms of bio-CNG infrastructure, Article 6 of the AFID places mandatory criteria on143 each MS:

The commissioning of an appropriate number of bio-CNG refuelling points accessible
 to the public in order to ensure that NGVs can circulate in urban/suburban
 agglomerations and other densely populated areas as determined by the MS's NPF. This
 must be completed by 31 December 2020.

- The commissioning of an appropriate number of bio-CNG refuelling points accessible
   to the public in order to ensure that NGVs can circulate at least along the existing TEN T Core Network, to ensure that NGVs can circulate throughout the EU. This must be
   completed by 31 December 2025.
- The necessary average distance between refuelling points along the TEN-T Core
   Network should be approximately 150 km. This must be completed by 31 December
   2025.
- 155

## 156 <u>TEN-T Guidelines:</u>

157 The EU Transport Policy Regulation (EU) No 1315/2013 aims to develop the Core Network 158 Corridors of the TEN-T and was adopted by the EU in 2013 (EC, 2014b). The TEN-T 159 Guidelines define a dual layer approach to how each MS is to implement the Core Network 160 Corridors by the end of 2030. The basic layer, known as the 'Comprehensive Network', should 161 ensure accessibility of all regions of the EU while the second layer, known as the 'Core Network', should efficiently facilitate trans-national traffic and long-distance flows for both 162 freight and passengers (EC, 2013). In Ireland, the TEN-T Core Network currently consists of 163 164 the route from Northern Ireland via Dublin and connects all the core sea ports from Dublin Port 165 (east) to Cork/Ringaskiddy (south) and Limerick/Foynes (west) (NRA, 2014).

- 166
- 167

168 National Service Area Policy:

The Transport Infrastructure Ireland (TII) is the statutory body charged with providing a safe and efficient network of national roads in Ireland under the current TEN-T policy. In August 2014, the TII introduced their Service Area Policy which sets out the policy basis on which transport service areas will be provided to meet the requirements of road users on the national road network in Ireland (NRA, 2014). In terms of service areas on all motorways of the Irish Core Network, the TII outlined the need for Type 1 Service Stations that are designed under the following criteria:

- A Type 1 Service Area (full service area) will be a large scale service area providing
   an amenity building (including a convenience shop, restaurant, washrooms and tourist
   information), fuel facilities, parking and picnic area.
- Type 1 Service Areas are to be provided approximately every 100 km.
- 180

#### 181 2.1.1 NPF of Ireland

182 In May 2017, the Irish Government issued its NPF as its strategy in order to satisfy the mandate 183 of the AFID. Bio-CNG is addressed in the NPF; proposing the development of 13 Core and 10 184 Comprehensive CNG refuelling stations by 2025, rising to 24 Core and 18 Comprehensive by 2030 (DTTS, 2017). Such an ambitious strategy is welcoming, however, the NPF does not go 185 186 far enough as to explain how this strategy will be achieved, what are the criteria for determining 187 bio-CNG refuelling station locations and how the production of biomethane will be aligned 188 with this infrastructural framework. Therefore, the criteria proposed by the authors in this paper will assist in enhancing the requirements of the AFID and strategy of Ireland's NPF to develop 189 190 a strategic infrastructure framework for bio-CNG deployment in Ireland.

192	2.1.2	The C	Core .	Networl	k

193 The AFID requires that bio-CNG fuelling facilities be made available every 150km along the 194 TEN-T Core Networks. However, from an Irish perspective, Type 1 service stations are 195 required every 100km along the Core Network.

- 196
- 197 Criteria 1: In order to avail of existing refuelling infrastructure for traditional transport
  198 fossil fuels, this paper recommends that bio-CNG refuelling installations be commissioning
  199 in the existing and proposed Type 1 stations (as identified by the TII) to be located every
  200 100km along the Core Network where possible.
- 201

This will allow bio-CNG technology to leverage off current multi-fuel service station facilities and therefore will not be required to develop standalone bio-CNG service stations. Co-locating bio-CNG installations with multi-fuel Type 1 service stations every 100km allows; further flexibility for customers, avoids duplication of service stations for different fuel types and ensures compliance with the AFID.

207

The proximity of the Type 1 service stations to the natural gas network is also a key consideration for the locating of bio-CNG installations and is dependent on a number of factors. Firstly, the closer a Type 1 service station is to the natural gas grid, then less capital investment is required to connect to the network. The cost per kilometre of constructing gas pipelines is significant. Furthermore, there are significant differences in the costs of connecting to the transmission network and connecting to the distribution network for a bio-CNG installation as highlighted as follows (Browne et al, 2011; Urban, 2013; GNI, 2017):

- Cost of connection to the natural gas network (excluding biomethane upgrading and injection):
- 217
- Transmission connection: €300,000

218	<ul> <li>Distribution connection: €150,000</li> </ul>
219	• Cost of pipeline to facilitate the connection to the natural gas network:
220	<ul> <li>Transmission pipeline: €1,000,000/km</li> </ul>
221	<ul> <li>Distribution pipeline: €100,000/km</li> </ul>
222	
222	

It should be noted that natural gas proximity and system pressure may not be considered as limiting factors if the bio-CNG developers feel that the service station location is of enough strategic importance once the additional costs do not jeopardise the bio-CNG installation's business case. Each bio-CNG installation project will have particular constraints and costs will vary depending on the developer requirements and location characteristics.

228

229

#### 29 2.1.3 The Comprehensive Network

230 The locations of bio-CNG service stations should be identified in areas where population 231 density is high and the opportunity to attract demand is greater. The AFID mandates the 232 commissioning of an appropriate number of bio-CNG refuelling points accessible to the public 233 in order to ensure that NGVs can circulate in urban/suburban agglomerations and other densely 234 populated areas as determined by the MS's NPF. However, the terms 'urban', 'suburban' and 235 'densely populated areas' are not defined in the AFID. Ireland's NFP only lists the main cities 236 where bio-CNG refuelling stations should be located; namely, Dublin, Cork, Limerick, Galway 237 and Waterford (DTTS, 2017). It does not consider suburban areas in its strategy document.

238

Therefore, this paper produces a matrix comparing a number of MSs in Table 2 which defines densely populated areas into urban and suburban categories based on the population density of the MS (EC, 2014a). For example, Ireland has a population density of 67 persons/km<sup>2</sup> and lies in the 0-75 persons/km<sup>2</sup> range. From population analysis of the cities and towns in Ireland, the authors propose that urban areas be defined as areas with populations greater than 50,000 persons (Galway, Limerick, etc.). Furthermore any urban area of greater than 100,000 persons
(Cork, Dublin) should be considered for significant bio-CNG development utilising multiple
locations if the other criteria highlighted in this paper is satisfied. Smaller suburban areas such
as large towns with a population of greater than 20,000 persons should be considered for pilot
bio-CNG utilising one location as a starting point for further development.

249

Population density (persons/km <sup>2</sup> )	Country	Population density (persons/km²)	Population	No. of Vehicles	Vehicles per 1000PE	Area to be defined	Defined Urban Area
							(persons)
0 –75	Ireland	67	4,605,501	2,208,056	479	Urban	>50,000
						Suburban	>20,000
75 - 150	Portugal	103	10,427,301	5,757,400	552	Urban	>200,000
						Suburban	>40,000
>150	United	263	64,308,261	34,457,011	536	Urban	>400,000
	Kingdom					Suburban	>60,000





Table 2: Population matrix for determining bio-CNG station locations

252

The United Kingdom lies in the greater than 150 persons/km<sup>2</sup> range and as a starting point should focus on multi-location development in urban areas of greater than 400,000 persons (London, Manchester, etc.) and one-off pilot locations in suburban areas of greater than 60,000 persons (Cambridge, Wigan, etc.) once the other criteria highlighted in this paper is satisfied. Once a MS has developed the urban and suburban areas in its population density range it can then focus on the next lower range to develop bio-CNG in smaller areas relative to the degree of success achieved from its initial development.

260

Criteria 2: In relation to the Comprehensive Network, the placement of multiple bio-CNG
 service stations should occur in urban areas, while pilot projects should be located in
 suburban areas with 1 station required per 20,000 PE (population equivalent).

**Criteria 3:** In order to allow full circulation of NGVs, bio-CNG stations should also be located within 150km along the Comprehensive Network.

267

Although it is not a requirement of the AFID, placement of stations at 150km along the Comprehensive network ensures that urban/suburban bio-CNG stations do not become isolated and restrict NGVs from undertaking long transit journeys.

- 271
- 272 2.2 Natural gas infrastructure requirements

273 In Europe, the European Network of Transmission System Operators for Gas (ENTSOG) is mandated by European Gas Regulation (EC 715/2009) to ensure the efficient management, 274 275 development and coordinated operation of the European gas network (EC, 2009b). The role of 276 ENTSOG is to facilitate and enhance cooperation between 44 national gas transmission system 277 operators (TSOs) across Europe to ensure the development of a pan-European transmission 278 system in line with EU energy goals (ENTSOG, 2015). ENTSOG's work is monitored by ACER (Agency for the Cooperation of Energy Regulators) whose mission is to complement 279 280 and coordinate the work of national energy regulators at EU level and work towards the 281 completion of the single EU energy market for electricity and natural gas (ACER, 2015a).

282

283 In January 2015, ACER published its updated Gas Target Model, presenting its vision for a 284 competitive and secure European gas market that benefits all consumers (ACER, 2015b). There 285 are two distinct options available in terms of harnessing natural gas infrastructure to introduce 286 bio-CNG into each MS. The first option is the use of the existing natural gas network as a 287 palpable solution in which a bio-CNG refuelling installation connects to the network to offtake 288 bio-CNG for supply. The second option is the utilisation of virtual pipeline in which bio-CNG 289 is delivered via a supply chain to final consumers using road or sea transportation (ACER, 290 2015b). In the absence of a natural gas network, virtual pipelines can be utilised as an intermediate step for the supply of regions prior to the development of a gas network or in cases
where the construction of pipeline infrastructure is not cost effective or technically not possible.
However, such a solution is considerable more expensive than the utilisation of existing gas
networks and is dependent on customer demand, location, distance from the loading terminal
and availability of road network (ACER, 2015b).

296

297 Criteria 4: Ireland (and similar MSs) should focus on the utilisation of the existing natural 298 gas network as the primary tool for introducing bio-CNG. In the absence of adequate natural 299 gas infrastructure, MSs should explore the option of virtual pipeline solutions in order to 300 allow full bio-CNG utilisation to be achieved throughout the regions and to facilitate full 301 competition if demanded by the market.

302

Gas Networks Ireland (GNI) is the owner and operator of the natural gas network in Ireland which is targeted for bio-CNG utilisation (GNI, 2013). Gas Networks Ireland develops, operates and maintains the gas infrastructure in Ireland consisting of over 13,000km of gas pipelines which is regulated by the Commission for Energy Regulation (CER). The Irish gas network serves over 160 population centres, providing significant coverage across the majority of urban and suburban areas in Ireland.

309

#### 310 **2.3 CNG installation requirements**

*Equipment:* In 2016, the International Standards Organisation (ISO) released the standard for natural gas fuelling stations – bio-CNG stations (ISO 16923:2016) which "covers the design, construction, operation, inspection and maintenance of stations for fuelling bio-CNG to vehicles, including equipment, safety and control devices" (ISO, 2016). The key equipment required for a bio-CNG refuelling installation includes a compressor (which increases the pressure from 1 bar to 250 bar), high pressure multistage storage (where the bio-CNG that has been compressed is stored), inter facility piping (that connect the compressor and storage to
the dispenser) and the dispensers (where the customer or end user dispenses gas to the NGV).
A cash point system is also required to record the volume of bio-CNG purchased while
refuelling.

321

322 Equipment sizing and costs: As this paper is proposing criteria for locating public service stations for all vehicle markets, ranging from the heavy goods commercial market to the private 323 324 car market, the size of the bio-CNG refuelling installation should be equipped to meet the needs 325 of all customers. The cost of the bio-CNG refuelling installation is dependent on a number of factors: the number of NGVs to refuel, the quantity of bio-CNG the NGVs use, the speed at 326 327 which the NGV is filled and the NGVs refuelling patterns (EERE, 2014). For example, a public 328 bio-CNG refuelling installation (as proposed in this roadmap) is assumed to serve large 329 numbers of NGVs with short refuelling windows and unpredictable refuelling patterns and thus 330 may require large compressors, larger storage capacity, and/or a large number of dispensers 331 (EERE, 2014).

332

333  $273,648\ln(x) + 491,859$ 

Where x = the quantity of trucks to be fuelled in a day.

334

335

336

Through the utilisation of Equation 1, the full capital cost of installing a bio-CNG refuelling
installation into an existing service station can be determined based on NGV consumption; as
developed in Figure 2 through a review of the industry focussing on public bio-CNG refuelling
installations (GNI, 2017). For example, a public bio-CNG refuelling stations which forecasts
the filling capacity of 40 trucks a day will cost approximately €1.5m to develop.

(Eq. 1)



Figure 2: Capital costs of bio-CNG installations (GNI, 2017)

#### 343

## 344

345

#### 346 2.4 NGV requirements

#### 347 <u>Vehicle ranges:</u>

348 NGV typically have a lower range in terms of distance travelled per fuel tank in comparison to 349 traditional fossil fuel vehicles (Engerer & Horn, 2010). To combat the lower distance range 350 that dedicated NGVs can travel, manufacturers reacted by developing bi-fuel and dual-fuel 351 vehicles which run on a mixture of bio-CNG and diesel, thus increasing the potential distance 352 travelled significantly and also providing the ability to refuel in traditional fossil fuel service 353 stations when required. Bi-fuel NGVs have two separate fuelling systems that allow them to 354 operate on either bio-CNG or petrol while dual-fuel NGVs have fuel systems that operates on 355 a mixture of natural gas and diesel fuel, usually starting on diesel then switch to a quantified 356 mixture of bio-CNG and diesel (PSE, 2015). The typical fuel ranges of industry available 357 NGVs while operating on bio-CNG is 200 - 400km for HGVs while smaller LGVs have a 358 range of up to 600kms on natural gas alone (NGVAE, 2015; Cenex, 2012). When considering 359 the locations of facilities not on the Core or Compressive TEN-T Networks in a MS, the

placement of bio-CNG installations should not be greater distance than the lower range ofindustry available NGVs.

362

## 363 **2.5 Biomethane requirements**

364

## 365 <u>AD infrastructure:</u>

In Ireland, as is the case with many MSs, there is currently no anaerobic digesters injecting biomethane into their respective natural gas networks. However, countries such as the United Kingdom, Germany and Sweden have an array of AD facilities injecting biomethane into their networks. *Goulding & Power* found that Ireland has the potential to develop 29 AD facilities, fuelling over 43,000 NGVs, when utilising 1% of the grassland area in Ireland and animal slurry as feedstock (Goulding & Power, 2013). Figure 3 highlights the potential for each county in Ireland to develop AD facilities from grass and animal slurries.



Figure 3: Suitable locations for AD from grass and slurry in Ireland based on area under

376

grassland (Goulding & Power, 2013)

377

## 378 Injection to the network:

In Ireland, all natural gas currently entering the network must adhere to the relevant gas quality
specifications laid down in Part G of the Transporter's Code of Operations (GNI, 2013).
Currently in Ireland, for the connection of a natural gas undertaking who wishes to provide

382	natural gas for the network; the GNI Code of Operations requires that any Entry Point must
383	hold a Connected System Agreement (CSA) to govern how the delivery of natural gas is
384	effectively achieved (GNI, 2013). The function of a CSA is to ensure that the Entry Point is
385	technically and operationally compatible at the point of connection such that the natural gas
386	network and associated natural gas production facility may safely be connected to deliver
387	natural gas to the network. At present, the GNI Code of Operations does not consider the
388	injection of an unconventional form of natural gas production such as biomethane from AD.
389	
390	Criteria 5: The criteria for biomethane injection should be managed through a specific CSA
391	which is individual for each biomethane injection facility.
392	
393	In order to deliver efficiencies and to avail of an already successfully developed natural gas
394	specification, a CSA for biomethane should utilise the same technical specifications for natural
395	gas in line with the Part G of the current GNI Code of Operations. The key elements of the
396	biomethane injection technical criteria are as follows (Goulding, 2011; GNI, 2013):
397	• Biomethane injection requires a compressor unit to compress the natural gas to the
398	operating pressure of the network at the point of entry. Specific technical requirements
399	to be mandated through the CSA.
400	<ul> <li>Distribution pressure: 25 mbarg - 4 barg</li> </ul>
401	- Transmission pressure: 9 barg - 85 barg
402	• As per the GNI Code of Operations, biomethane injection is required to meet natural
403	gas quality specification of the network to ensure it is of the same quality as the natural
404	gas in the network. This may be dependent on the specification defined by network
405	TSOs in each individual MS.
406	• There is no smell from natural gas, therefore under the GNI Code of Operations,
407	odourisation of biomethane is mandated before injection to ensure that the biomethane

408 can be identified by humans if a leak were to occur. This is dependent on the
409 specification defined by network TSOs in individual MS as some networks do not
410 transport odoured gas.

411

## 412 <u>Proximity of network:</u>

As is the case with determining bio-CNG installation locations, the proximity of the anaerobic 413 414 digester to the natural gas network and the type of network to connect to (transmission or 415 distribution) are key considerations in terms of additional capital costs to the development as 416 highlighted in Section 2.1.2. These costs do not include the cleaning and injection equipment. Again, it should be noted that all such connections for biomethane injection have specific costs 417 418 depending on the characteristics of the individual biomethane injection facility to be connected. 419 However, it is clear that the closer the location of the anaerobic digester to the network the less 420 expensive the pipeline will cost to connect to the network.

421

422 Criteria 6: Biomethane injection facilities should be located preferably near the distribution
423 network to ensure that connection costs are economically viable.

424

425 Connecting to the distribution network will result in lower operational costs as the biomethane 426 will not need to be compressed as much as if it was being injected in the transmission network 427 at a significantly higher pressure. However, when injecting into the distribution network, sufficient network capacity must be available. Preferably, a biomethane facility should be 428 located near a point on the distribution network where a significant consistent demand is 429 430 required even through low demand seasons (Goulding, 2011). If injection into a distribution 431 network is not viable, then a connection to the transmission network may be utilised, albeit at 432 significantly higher cost.

434 **4.0 Results** 

435

436 4.1 A strategic infrastructure framework

The criteria determined in this paper to develop a strategic infrastructure framework for EU
MSs has been applied to Ireland in which the following proposals are suggested for
implementation:

440

441

- The construction of 22 bio-CNG refuelling stations in existing Type 1 Service stations as illustrated in Figure 4.
- 11 of the 22 bio-CNG refuelling stations should be located on the Core Network within
   100km of each other and fully service the Irish TEN-T Core Network from Northern
   Ireland via Dublin to both major sea ports in Cork/Ringaskiddy and Limerick/Foynes.
- The Comprehensive Network is serviced by strategically placing the other 11 bio-CNG
   service stations in urban/suburban cities and towns located on the Comprehensive
   Network based on their population profile as determined in Section 2.1.3.
- In terms of the natural gas infrastructure, 17 of the 22 bio-CNG stations are located in
   areas where the natural gas network is present. Two further bio-CNG stations are
   proposed for towns where the natural gas network is currently being extended to;
   namely Wexford Town and Nenagh.
- Three virtual pipeline bio-CNG stations are included in order to service areas of the
   country where there is no natural gas network available but are of strategic importance.
   These three stations will allow counties in the south-west as far as Kerry and counties
   in the north-west such as Sligo and Donegal to utilise bio-CNG and travel in NGVs
   from one end of Ireland to the other.

457

The bio-CNG refuelling stations locations meet all the criteria determined in this paper ashighlighted in Table 2. The locations of the Core and Comprehensive bio-CNG refuelling

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- 460 stations in Ireland allows NGV customers to travel along the Ten-T network of the entire
- 461 State on bio-CNG with no station greater than 150km from the next bio-CNG station.
- 462





	Station Location	County	TEN-T Network	Core Network Linkage	Distance to Nearest Station (km)	Population	Gas Network Available	Biomethane Injection Potential
			(Criteria 1)	(Criteria 1)	(Criteria 1, 3)	(Criteria 2)	(Criteria 4)	(Criteria 5, 6)
1	Cork Harbour - Ringaskiddy	Cork	Core	Cork/Dublin	45km to Fermoy		Yes	Very-High
2	Fermoy	Cork	Core	Cork/Dublin	56km to Cashel	6,489	Yes	Very-High
3	Cashel	Tipperary	Core	Cork/Dublin	75km to Portlaoise	4,051	Yes	Very-High
4	Portlaoise	Laois	Core	Cork/Dublin Limerick/Dublin Dublin/Dundalk	56km to Naas	20,713	Yes	Medium
5	Naas	Kildare	Core	Cork/Dublin Limerick/Dublin	40km to Ballymun	20,145	Yes	Low
6	Ballymun	Dublin	Core	Cork/Dublin Limerick/Dublin	25km to Lusk	22,109	Yes	Low
7	Dublin Port	Dublin	Core	Cork/Dublin Limerick/Dublin	10km to Ballymun		Yes	Low
8	Nenagh	Tipperary	Core	Limerick/Dublin	72km to Portlaoise	8,439	Planned	Very High
9	Foynes Port	Limerick	Core	Limerick/Dublin	78km to Nenagh		Yes	High
10	Dundalk	Louth	Core	Dublin/Dundalk	73km to Lusk	37,816	Yes	Low
11	Lusk	Dublin	Core	Dublin/Dundalk	30km to Dublin Port	7,022	Yes	Low
12	Cork City	Cork	Comprehensive		40km to Fermoy	198,582	Yes	Very High
13	Waterford City	Waterford	Comprehensive		120km to Cork City	51,519	Yes	Medium
14	Wexford Town	Wexford	Comprehensive		60km to Waterford City	20,072	Planned	Medium
15	Limerick City	Limerick	Comprehensive		40km to Nenagh	91,454	Yes	High
16	Galway City	Galway	Comprehensive		85km to Athlone	76,778	Yes	High
17	Athlone	Westmeath	Comprehensive		125km to Ballymun	20,153	Yes	Medium
18	Mullingar	Westmeath	Comprehensive		82km to Ballymun	20,103	Yes	Medium
19	Tallaght	Dublin	Comprehensive		20km to Ballymun	71,504	Yes	Low
20	Tralee	Kerry	Comprehensive		75km to Limerick City	23,693	Virtual pipeline	High
21	Sligo	Sligo	Comprehensive		130km to Mullingar	19,452	Virtual pipeline	Medium
22	Letterkenny	Donegal	Comprehensive		112km to Letterkenny	19,588	Virtual pipeline	Medium

465

 Table 2: A Bio-CNG public access refuelling network for Ireland

466 **5.0 Discussion** 

467

## 468 **5.1 Definitive Criteria**

This paper proposes a number of criteria which will assist countries such as Ireland to develop bio-CNG supply infrastructure, and comply with the requirements of the AFID. However in a number of instances, this paper highlights that the AFID and NPF of Ireland does not go far enough and this paper recommends strengthening in a number of areas including:

A requirement that bio-CNG fuelling facilities be made available every 100km along
 the TEN-T Core Networks, instead of the current 150km, this would align EU policy
 to Irish National Policy and best practice for the provision of service stations. This will
 reduce the need to develop standalone bio-CNG service stations and will avoid the
 duplication of service stations for various fuel types.

A definition to adequately define the terms 'urban' and 'sub-urban' is required. This
paper proposes a definition of urban and sub-urban areas based on the population
density of a country. Using Ireland as a test case; an urban area is defined as >50,000PE
and a sub-urban area is >20,000PE.

The installation of bio-CNG units every 150km along the Comprehensive Network in
 existing or proposed service stations. This would ensure that vehicles travelling
 throughout Europe could avail of bio-CNG throughout the Comprehensive Network
 and are not confined to the just the Core network.

486

In order to compliment the enhancements to current EU infrastructure policy conceived by the
authors in this paper and to fully realise the potential for bio-CNG deployment, additional
technical infrastructural requirements must also be taken into consideration including:

The utilisation of the existing natural gas network as the primary tool for bio-CNG deployment, as this is more cost effective than using a virtual pipeline. This will help
 to ensure that bio-CNG is economically competitive.

- To ensure that biomethane injection into the natural gas network complies with the
   technical specification of the associated network in each MS.
- Development of biomethane injection facilities into the distribution network preferably
   to ensure connection and operational costs are economically competitive. The injection
   facilities should be located in counties with high agricultural AD potential as
   determined by the authors.
- 499
- 500

### 501 6.0 Conclusions

502 Using Ireland as a test case, if the proposed criteria was implemented then Ireland could deploy 503 22 bio-CNG service stations to initiate an alternative bio-CNG transport fuel market as 504 mandated by the AFID; 19 of which are located on the existing (and proposed) natural gas 505 network with a further three virtual pipeline stations. 9 of these stations could be located in 506 areas where there is a high or very-high biomethane potential. This infrastructural framework 507 would enable Ireland to comply with the AFID, enhance and provide a more defined bio-CNG 508 strategy for Ireland's NPF, and will also help Ireland achieve its RES-T by 2020. However, 509 more importantly the proposed service stations are close to large population centres in Ireland 510 thus further strengthening the potential for bio-CNG as a sustainable transport fuel into the 511 future.

512

513 This paper proposes six criteria to abide by in order to develop a successful infrastructure 514 framework for bio-CNG deployment in Ireland. The criteria range from strengthening current 515 EU policy and the NPF of Ireland, to essential technical infrastructural requirements to be taken

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516	into consideration. Furthermore, the proposed criteria can be utilised as a template to follow
517	for other MSs with similar infrastructure and bio-CNG requirements.
518	
519	
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525	
526	
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