

GEW45-14

603.3.1

Proponent: Bruce Swiecicki, National Propane Gas Association, representing self
(bswecicki@npga.org)

Revise as follows:

603.3.1 Gaseous fuels. Gaseous fuels including, but not limited to, natural gas, LP gas, coal gas, hydrogen, landfill gas, digester gas and biogas shall be capable of being metered at the building site to determine the gross consumption and peak demand of each different gaseous fuel by each building on a building site. The installation of gas meters and related piping shall be in accordance with the *International Fuel Gas Code*.

Exception: Gaseous fuels stored and replenished on site shall not be required to be metered for peak demand.

Reason: The concept of measuring and controlling "peak demand" at the building site is based on two primary considerations. First, controlling the peak demand at the building site allows the building owner or occupants to reduce their energy consumption during a time period that the energy provider is charging higher than normal prices for energy delivered to the building. Secondly, the reason energy providers charge more for energy during periods of peak consumption is that the energy "grid" or delivery infrastructure is to avoid operating the system at maximum or near maximum capacity. Sustained operation at these levels can potentially bring the system down in a "crash," leading to a brownout or blackout condition. Therefore, building owners and occupants relying on energy sources that are not within their control have an incentive to monitor and control the use of that energy during peak demand periods.

Buildings utilizing propane as an energy source are not subject to the same constraints as other energy sources. The source of propane is stored in a container on the building property and the container is replenished with propane periodically to maintain a steady supply. The building owner or occupants have already paid for the energy in the propane container and therefore are not subject to increased pricing during periods of heavier than normal use.

It is important to note that each ASME propane container is already provided with a volumetric liquid level gauge that is used to determine the remaining amount of propane in the container, which satisfies the requirement in 603.3.1 for metering the gross consumption of gas.

To summarize, the requirement for peak demand metering for gaseous fuel systems that are stored and replenished on site is a requirement that serves no useful purpose while imposing a needless burden on the building owner. It must be removed from the code.

Cost Impact: Will not increase the cost of construction.

GEW 45-14: 603.3.1-SWIECICKI797