

## **TG Certifications Pty Ltd.**

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Submission

Re: Updates to Electricity and Gas Regulations.

### **1. ECOC's**

#### **41—General gas fitting work**

(1) For the purposes of section 56 of the Act, a person who carries out work on a gas installation or proposed gas installation (including work comprised of installing a Type A appliance, but not including work comprised of installing, commissioning or modifying a Type B appliance)...

The above clause appears to be outdated, in that it harks back to the era when SAGASCO attended site and commissioned Type B appliances. The current situation is that Type B appliances are commissioned by a gas fitter and the finished job is inspected by an Authorised Officer, such as myself.

Commissioning a gas appliance, whether it is Type A or Type B, is clearly gas fitting work and it appears to be an anachronism that the gas fitter commissioning a 20 kW hot water heater has to fill out a ECOC but the gas fitter commissioning a 20 MW steam boiler does not.

### **2. Inclusion of liquid gas burners.**

Currently, the regulations appear silent on the subject of liquid burners, such as vaporising burners fueled by liquid propane. In the past this has led to the bizarre situation where, as a Type B certifier, I am confronted by large equipment burning

liquid propane but the only part I can look at is the small pilot burner because that is fueled by vapour. This comes from AS 3814:2018; Clause 1.1.2 which excludes “any vaporising fuel burner”. This is reasonable because AS3814 is a technical Standard focused on gas burners, however it does not seem reasonable for the State Gas Regulations to take such a narrow view. AS1375:2013 covers liquid fuel burners and it would seem reasonable for the State Regulations to apply to any gas, or fuel which is gaseous at STP (Standard Temperature and Pressure). It is possible that the Regulations currently do this but that is not how they have been interpreted in the past.

This may well have implications into the future as there is currently a lot of research happening around the use and deployment of hydrogen and related fuels. Potentially, situations might arise where a new fuel source slips around the regulations because it doesn't fit a narrow definition. Liquid propane is covered with regard to the installation by [37-1 (b) (i)].

The solution may be as simple as adding AS1375 into [43-1], or perhaps something in the interpretation section stating: “Gas includes any fuel which is gaseous at STP”.

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28<sup>th</sup> April 2023