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EPA ICR No. 1736.08, OMB Control No. 2060-0328

March 25, 2019

Mr. Jerome Blackman
Office of Atmospheric Programs,
Climate Change Division, (6207A)
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: EPA Information Collection Request Submitted to OMB for Review and Approval;
Comment Request; EPA's Voluntary Natural Gas STAR Program (Renewal),
84 Fed. Reg. 5676 (Feb. 22, 2019)

Dear Mr. Blackman and OMB Desk Officer for EPA:

The American Gas Association (AGA) submits these comments to EPA and the Office of Management and Budget (OMB) to strongly support EPA's Information Collection Request (ICR) for the Voluntary Natural Gas STAR Program. We urge OMB to approve EPA's ICR request for renewal with modification, to allow this important, cost-effective voluntary program to continue past March 31, 2019, when the current Natural Gas STAR ICR would otherwise expire.

AGA and its members have long been committed to voluntary action to reduce natural gas emissions to improve the carbon footprint of delivered natural gas. Our members' actions, both within and beyond EPA Natural Gas STAR, have reduced methane emissions by over 72% from the natural gas distribution sector from 1990 through 2016, based on the most recent EPA Inventory of Greenhouse Gas (GHG) Emissions in the U.S. published April 13, 2018.

Emissions from natural gas distribution have declined to less than 0.1% of annual production. Overall, the latest EPA GHG Inventory shows emissions from the natural gas value chain from production to the power plant, industrial, commercial or residential customer declined by 16%

over the same timeframe to just 1.2% of annual production. This is well below levels needed to demonstrate *immediate* climate and environmental benefits for switching from any other fossil fuel to affordable, cleaner, lower-carbon natural gas for generating electricity, powering cars, energizing industry, and heating homes and businesses.¹

The EPA GHG Inventory helps to credibly demonstrate our progress on a *nationwide basis* and to inform a fact-based policy discussion. We need that same, credible, fact-based approach to show progress made by our *individual member companies*, and two EPA programs are essential for that purpose: (1) the EPA GHG Reporting Rule; and (2) the voluntary Natural Gas STAR program and its new Methane Challenge Program. The cost-effective methane reduction technologies and best practices developed through the Natural Gas STAR program have significantly contributed to the methane reductions at individual companies and across the industry over the past two decades. Moreover, Natural Gas STAR's technology transfer workshops have helped our member natural gas distribution companies -- as well as others in the natural gas value chain -- learn about and implement innovative technologies that not only reduce emissions but also help modernize energy delivery systems cost-effectively, helping to deliver energy to American consumers safely, reliably and affordably, while providing good-quality, family-supporting jobs. Thus, the EPA Natural Gas STAR program supports important policy goals of Executive Order No. 13783, "Promoting Energy Independence and Economic Growth" (March 28, 2019).²

AGA has been an early and strong supporter of the Natural Gas STAR program since its inception in 1993 until the present. All of the current 37 natural gas distribution partners are AGA member companies, as are most of the natural gas transmission and storage partners of Natural Gas STAR. These companies obviously still find value in the voluntary program and do not find the reporting or paperwork burdens unreasonable.

We agree with EPA's estimate that information collection burdens have declined due to the maturity of the program, the partners' familiarity with the forms, their use of online report forms and/or internal data collection systems.³

¹ See EPA GHG Inventory (published April 13, 2018) and AGA's analysis, Understanding Updates to the EPA Inventory of Greenhouse Gases (August 2018) available at: <https://www.aga.org/research/reports/understanding-updates-to-the-epa-inventory-of-greenhouse-gases-august-2018/>

² EO 13783, signed March 28, 2017; published 82 Fed. Reg. 16093 (March 31, 2017).

³ See Supporting Statement for EPA Information Collection Request Number 1736.08 EPA's Natural Gas STAR Program (Aug. 27, 2018) pp. 21-22.

AGA appreciates the opportunity to comment. If you have any questions, please contact me.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pamela A. Lacey". The signature is written in a cursive style with a large, looped initial "P".

Pamela A. Lacey
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