Re: AGA Comments on EPA Updates Under Consideration for the 2019 Inventory of U.S. GHG Emissions and Sinks – Liquefied Natural Gas Segment Emissions

Dear Ms. Weitz:

The American Gas Association (AGA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency’s (EPA) consideration of updates for liquefied natural gas (LNG) storage facilities and LNG import/export facilities in EPA’s Inventory of U.S. Greenhouse Gas Emissions and Sinks (GHGI). These comments are in response to the EPA’s memo requesting stakeholder feedback.1

AGA represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 74 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 70 million customers — receive their gas from AGA members. AGA and its members are directly affected by the GHGI because it provides the best available estimate of natural gas emissions from our members’ operations – including natural gas local distribution, transmission, storage, and LNG facilities.

AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies and industry associates. This gives AGA a broad perspective and deep industry knowledge. Today, natural gas meets more than one-fourth of the United States’ energy needs. If our members are to continue to fulfill that critical role across the country, it is important to demonstrate how our members’ efforts to modernize their systems and practices are continuing the declining trend in emissions.

Currently, the GHGI relies on emission factors (EFs) based on the 1996 GRI/EPA study to estimate LNG storage and LNG import terminal methane and CO₂ emissions. Because specific emissions data for LNG storage stations and import terminals was not available, these EFs were developed based on underground natural gas storage and transmission compressor station data. EPA is considering improving the methodology used to estimate annual average methane and CO₂ emissions from LNG facilities by developing EFs based on actual emissions data reported under Subpart W for LNG storage (peak shaving) facilities and LNG import and export terminals.

AGA supports the development of EFs based on data collected under Subpart W for LNG storage and LNG import/export facilities. By incorporating data reported under Subpart W, GHGI emissions estimates will more accurately reflect the current state of operations at LNG storage and LNG import/export facilities. Additionally, AGA supports the recommendation that emissions data for LNG operations be updated annually to better account for the dynamic trends in the LNG sector. Finally, AGA recommends that EPA strongly consider the fact that some LNG facilities use electric compressors rather than oil or natural gas-fired compressors when developing revised EFs for LNG emissions.

EPA also sought stakeholder feedback on whether LNG import-only terminals should be considered separately from LNG terminals with export capability. Given the differences in operations at LNG terminals, as well as the significantly lower emissions at import-only terminals, AGA recommends that LNG import-only terminals be considered separately from terminals with export capability to more accurately document the sources and levels of emissions from LNG terminals.

AGA commends EPA’s efforts to improve the accuracy of the data in the GHGI. As the quality of the data in the GHGI continues to improve, industry, the public, and policymakers will be better able to understand natural gas methane emissions and the important role natural gas plays in reducing greenhouse gas emissions.

AGA appreciates the opportunity to comment. If you have any questions, please do not hesitate to contact me or Tim Parr, AGA Senior Counsel, at tparr@aga.org.

Respectfully Submitted,

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