May 7, 2018

Mr. Justin Pryor
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 Methane Challenge Program, 83, Fed. Reg. 15836 (Notice and Request for Comment April 12, 2018)

Dear Mr. Pryor 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 Methane Challenge Program. We urge OMB to approve EPA’s ICR request, as it is essential to stand up this program to help our member companies demonstrate their commitment and the progress they are making in reducing methane emissions.

The American Gas Association, founded in 1918, 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 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. Today, natural gas meets more than one-fourth of the United States’ energy needs.

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, reduced methane emissions by 75% 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 are now down 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.

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. AGA, its members and other stakeholders worked with EPA to craft a flexible, workable and credible voluntary approach to allow companies to make voluntary commitments to implement best management practices (BMPs) – or to adopt the approach developed by ONE Future – and to report on their progress to EPA.

AGA was an early and strong supporter of both the Natural Gas STAR program, since its inception in 1993, and its modern update – the Methane Challenge Program. Of the 41 original founding partners of Methane Challenge in 2016, all are AGA members. The program has since expanded to include participants from across the value chain. AGA and its members have supported and participated in every Methane Challenge technical workshop since the program’s inception.
OMB’s approval of EPA’s ICR request is essential to fully stand up the Methane Challenge Program. We have been awaiting this opportunity for our members to report on their progress toward achieving the goals they set in 2016 and to see this progress validated and provided transparently to the public on EPA’s Natural Gas STAR Methane Challenge website. We urge OMB to approve EPA’s ICR request and allow this important voluntary program to operate fully, as Congressional appropriators recently directed in the EPA budget process.¹

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

Respectfully Submitted,

[Signature]

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