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**Docket No. EPA-HQ-OAR 2004-0082**

November 5, 2018

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

**Re:** AGA Comments on EPA's Proposed Information Collection Request (ICR) Renewal and Modification, EPA's Voluntary Natural Gas STAR Program, 83 Fed. Reg. 45126 (Notice and Request for Comment Sept. 5, 2018)

Dear Mr. Blackman:

The American Gas Association (AGA) submits these comments to EPA to strongly support EPA's Proposed Information Collection Request (ICR) Renewal and Modification for the Voluntary Natural Gas STAR Program.

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, 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 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. 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.

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 would agree with EPA's estimate that information collection burdens have declined due to the maturity of the program, the partner's familiarity with the forms, their use of online report forms and/or internal data collection systems. 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 cursive script that reads "Pamela A. Lacey".

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