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March 15, 2021

Attn: Ms. Melissa Weitz  
U.S. Environmental Protection Agency  
Climate Change Division  
Office of Air and Radiation  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: AGA Comments on EPA Draft 2021 GHG Inventory (1990-2019)**

Dear Ms. Weitz:

The American Gas Association (AGA) appreciates the opportunity to comment on EPA's Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks (1990-2019) (Draft 2021 Inventory). AGA is pleased to see that the Draft 2021 Inventory shows that methane emissions from natural gas distribution systems across the nation declined by 69 percent from 1990 to 2019, and that methane emissions from the natural gas value chain from production to the burner tip are still estimated to be just one percent of annual production in 2018 and 2019. However, we urge EPA to reconsider the proposed methodology for recalculating emissions from industrial and commercial meters.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 75 million residential, commercial, and industrial natural gas customers in the U.S., of which 95

percent — more than 72 million customers — receive their gas from AGA members. Today, natural gas meets more than 30 percent of the United States' energy needs.

AGA is very concerned that EPA's new approach of averaging emissions factors from the Gas Technology Institute's (GTI) 2009 Study<sup>1</sup> and GTI's 2019 Study would likely *overestimate emissions and undermine accuracy*. AGA urges EPA to work with GTI and our members to develop a more complete and granular data set that will inform a more accurate approach for estimating emissions from industrial and commercial meters. AGA believes a deliberate approach to developing new estimates from these meter sets is the prudent and correct path, and that more data is necessary before changing the methodology for commercial and industrial emission factors and calculations.

In the 2020 Inventory, EPA used the GTI 2009 data and resulting commercial meter emission factor to both commercial and industrial meters, due to the limitations of available industrial meter data. It is understood that industrial and commercial meter sets collectively are likely emitting more methane overall than currently presented in the GHGI. This is due to significant emission rate differences between industrial and commercial meters, across regions, and among meter set types.<sup>2</sup>

However, the solution is *not* to adopt EPA's proposal to simply average emissions factors (EFs) from GTI 2009 and GTI 2019, applying weighted average population EFs from the two studies across the time series for the methodology implemented in the Inventory. That approach would likely result in significantly overestimating emissions, thereby undermining accuracy. Recalculations based on the proposed methodology

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<sup>1</sup> Gas Technology Institute and Innovative Environmental Solutions, Field Measurement Program to Improve Uncertainties for Key Greenhouse Gas Emission Factors for Distribution Sources, November 2009. GTI Project Number 20497. OTD Project Number 7.7b (GTI 2009)

<sup>2</sup> Gas Technology Institute and US Department of Energy, Classification of Methane Emissions from Industrial Meters, Vintage vs Modern Plastic Pipe, and Plastic-lined Steel and Cast-Iron Pipe. June 2019. GTI Project Number 22070. DOE project Number ED-FE0029061. (GTI 2019)

would result in a 19.5 percent increase in estimated distribution methane emissions from commercial and industrial meters.

The previous inventory used a lower EF (based on commercial meter measurements only) and applied that EF to both commercial and industrial meter counts. The proposed methodology uses commercial meter data from both the 2009 and 2019 GTI studies to develop an EF that is applied to commercial meter counts, and uses industrial meter data from both the 2009 (leak emissions only) and GTI 2019 studies to develop an EF that is applied to industrial meter counts.

As GTI itself recommended, more data is needed to develop separate emission factors for different categories of industrial/commercial meters, since only 186 industrial meters and 337 commercial meters of approximately 5.7 million meters nationwide were visited in the GTI 2019 study.

AGA recommends EPA should instead use separate emission factors, delineated first by facility type and then by region. In GTI 2019 and in GTI's presentation at the EPA GHGI Webinar in September 2020, GTI indicated the large regional differences could be linked to low sample numbers in some regions leading to overall uncertainty nationwide data. Based on these factors, AGA believes it is necessary to collect more data to be able to use region-specific EFs rather than national EFs and provide the most accurate Inventory estimation.

AGA appreciates the opportunity to comment. If you have any questions, please do not hesitate to contact me or Tim Parr, AGA Deputy General Counsel, at [tparr@aga.org](mailto:tparr@aga.org).

Respectfully Submitted,

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

Pamela Lacey  
Chief Regulatory Counsel  
American Gas Association  
400 N. Capitol St., NW Washington, DC 20001  
202.824.7340  
[placey@aga.org](mailto:placey@aga.org)