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Docket ID No. EPA-HQ-OAR-2023-0001

March 17, 2023

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 the Public Review Draft 2023 Inventory of U.S. Greenhouse Gas Emissions and Sinks (1990-2020), 88 Fed. Reg. 9881 (Feb. 15, 2023), Docket ID No. EPA-HQ-OAR-2023-0001**

Dear Ms. Weitz:

The American Gas Association (“AGA”) appreciates the opportunity to comment on EPA’s draft Inventory of U.S. Greenhouse Gas (GHG) Emissions and Sinks (1990-2021) noticed<sup>1</sup> in the Federal Register on February 15, 2023 (“Draft Inventory”).

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 73 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 third of the United States’ energy needs.<sup>2</sup>

We are pleased to see the Draft Inventory shows methane emissions from natural gas local distribution systems across the country declined by 70 percent from 1990 to 2021. The data reflect the work AGA member gas utilities have been doing to modernize their systems and implement best practices. This work has been enhanced by voluntary initiatives, including sharing best practices for methane detection, quantification and reduction in AGA workshops

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<sup>1</sup> 88 Fed. Reg. 9881 (Feb. 15, 2023).

<sup>2</sup> For more information, please visit [www.aga.org](http://www.aga.org).

and EPA's voluntary Gas STAR program, and more recently through commitments made and implemented under EPA's Methane Challenge program.

However, we continue to be concerned about EPA's use of a few studies with significant limitations to provide an estimate of post meter emissions. For the reasons stated in our comments last year on the Public Review Draft of the 2022 GHG Inventory, attached as Appendix A to this letter, AGA urges EPA to remove the estimate of residential post-meter emissions and revisit the estimate in a future Inventory once data gaps and uncertainties can be more reliably addressed. We also urge EPA to work with the Department of Energy (DOE) to fund the necessary research to fill these data gaps. Funds recently made available to DOE and EPA by Congress in the Inflation Reduction Act could be used for this purpose. We make this request for the following reasons.

1. There are no consensus standard test methods or standard practices for measuring and determining the flow rate or volume of methane emissions from end-use natural gas appliances. Differences in the types of measurement equipment used, performance-related attributes of the equipment, and standardization of the measurement protocols themselves should be addressed first before utilizing any individual study on these types of methane emissions. The standards development for testing protocols would be time-intensive work but essential to establish the credibility for estimating post-meter methane emissions.
2. The use of a limited set of studies conducted on a small sample of homes is unlikely to be representative of a national U.S. estimate. It is especially inappropriate to rely on a small sample size in a data set known to have a fat tail distribution.
3. There are considerable data gaps, large uncertainties, and orders of magnitude difference among the available studies EPA reviewed for these post meter methane emissions estimates.
4. There were no repeated tests to determine the reproducibility of the methods referenced or to determine whether emissions vary with time or environmental conditions.

AGA appreciates the opportunity to comment. If you have any questions, please contact me at [placey@aga.org](mailto:placey@aga.org) or Tim Parr, AGA Deputy General Counsel, [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, flowing style.

Pamela A. Lacey  
Chief Regulatory Counsel  
American Gas Association  
400 N. Capitol St., NW  
Washington, DC 20001