



Submitted Electronically Via OOG.Surveys@eia.gov

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U.S. Energy Information Administration
Department of Energy
1000 Independence Ave. SW, EI-25
Washington, DC 20585

**RE: EIA’s Natural Gas Data Collection Package 60-Day FRN
AGA’s Comments on Agency Information Collection Proposed Extension, 88 Fed.
Reg. 63098 (Sept. 14, 2023)**

U.S. Energy Information Administration:

The American Gas Association (“AGA”) appreciates the opportunity to comment on the U.S. Energy Information Administration’s (“EIA”) Agency Information Collection Extension regarding the surveys in the Natural Gas Data Collection Program (“Notice”).¹

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 78 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 74 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. AGA and its members are directly affected by the EIA information collection request because our members respond to EIA natural gas surveys. Furthermore, AGA and its members rely on EIA data issuances for publications and market analyses.

On September 14, 2023, EIA issued a notice and request for comments, *i.e.*, the “Notice,” regarding the proposed three-year extension, with changes, of the Natural Gas Data Collection Program. In the Notice, EIA sought comments on, among other things, whether or not the proposed collection of information is necessary for the proper performance of agency functions, including whether the information will have a practical utility and how EIA can improve the quality, utility, and clarity of the information it will collect.² While EIA’s Notice concerns several forms, these comments provide input on one form, EIA-176 - Annual Report of Natural and Supplemental Gas Supply & Disposition.

¹ *Agency Information Collection Proposed Extension*, 88 Fed Reg. 63098 (Sept. 14, 2023).

² Notice at 63099.

I. AGA Supports the Collection of Renewable Natural Gas Information and Recommends Certain Revisions to Form EIA-176

AGA generally supports EIA's efforts to incorporate the collection of information related to renewable natural gas or "RNG." Currently, the Form EIA-176 instructions require "[p]roducers of high-Btu renewable natural gas that inject into an interstate or intra-state pipeline, or who deliver to a natural gas distributor" to submit the form. The instructions also state that "[r]enewable natural gas consists mostly of methane and is chemically similar to conventional natural gas. RNG can be produced by purifying biogas produced at landfills, wastewater treatment facilities, and digesters." Synthetic natural gas has a different definition that includes a manufactured product, chemically similar in most respects to natural gas, resulting from the conversion or reforming of coal or petroleum hydrocarbons. Synthetic natural gas and renewable natural gas are discussed together in the introduction and are reported on Form EIA-176 on the same line.

A. Renewable Natural Gas Information Should Be Collected Separately on Form EIA-176

AGA recommends that EIA revise Form EIA-176 and the instructions so that information related to renewable natural gas is collected and reported separately from data concerning synthetic natural gas. Due to the increased availability of renewable natural gas over the last few years and the expected growth in the sector, AGA believes that the reporting of information concerning renewable natural gas separately on Form EIA-176 is warranted. Over the last several years there has been a growing interest in the use of renewable natural gas by natural gas utilities and customers, and these activities are expected to increase over time. S&P Global reported in October 2023, that renewable natural gas is "rapidly gaining momentum in the US as a lower-carbon substitute for conventional natural gas" and the "market is taking off like a rocket."³ Notably, according to S&P Global, operating renewable natural gas facilities have increased tenfold in the US since 2011 to exceed 300 in 2023, and more than 450 additional facilities are under construction or in development.⁴ By 2024, the U.S. renewable natural gas market is expected to grow 97% year over year and another 50% in 2025.⁵ Establishing a separate reporting mechanism on Form EIA-176 for renewable natural gas will help market participants, policymakers, and other consumers of EIA data better understand changes in the industry over time.

Whether EIA collects the relevant data for renewable natural gas separately or not, EIA should appropriately define what is encompassed by the term "renewable natural gas." The instructions for Form EIA-176 defines renewable natural gas as:

³ S&P Global, Daily Update: October 19, 2023, available at <https://www.spglobal.com/en/research-insights/articles/daily-update-october-19-2023#:~:text=As%20the%20transition%20to%20a,of%20turning%20trash%20into%20fuel>.

⁴ *Id.*

⁵ *Id.*

[a] gaseous substance consisting mostly of methane, and chemically similar to conventional natural gas. Renewable natural gas can be produced by purifying biogas produced at landfills, wastewater treatment facilities, and digesters.⁶

To improve the utility of the information the agency collects, AGA recommends adding a different definition for renewable natural gas in the instructions. Specifically, AGA recommends that EIA use the following definition for renewable natural gas for its forms and instructions:

pipeline compatible gaseous fuel derived from biogenic or other renewable sources that has lower lifecycle carbon dioxide equivalent (CO₂-eq) emissions than geological natural gas.⁷

The foregoing definition is how AGA defines “renewable natural gas” and it was developed by the natural gas utility sector,⁸ with the explicit intent to be inclusive of all current and potential renewable natural gas feedstocks and production technologies.⁹ Furthermore, the proposed definition broadly encompasses gaseous fuel derived from biomass or other renewable sources that is interchangeable with geologic or other traditionally sourced natural gas. Recognizing the significant prospects for growth in the renewable natural gas market, particularly within the commercial, residential, and industrial sectors of the economy, AGA urges EIA to be forward-looking in its development of an updated Form EIA-176. Specifically, EIA should not expressly limit the collection of renewable natural gas data to only three production methods, but rather begin by updating the definition of “renewable natural gas” and recognizing the multitude of feedstocks and production technologies that could be used today, and in the future, to produce renewable natural gas. The use of the broad, forward-looking definition of renewable natural gas proposed by AGA will alleviate the need to make ongoing revisions as new renewable natural gas feedstocks and production methods become commercialized.

Today, renewable natural gas can be produced from different feedstocks and production technologies. The feedstocks include landfill gas, animal manure, water resource recovery facilities, food waste, agricultural residues, forestry and forest product residues, energy crops, the use of renewable electricity, and the non-biogenic fraction of municipal solid waste.¹⁰ The feedstocks are assumed to be processed using one of three technologies to produce renewable natural gas, including anaerobic digesters, thermal gasification systems, and power-to-gas in combination with a methanation system.¹¹ Incorporating a more inclusive definition of renewable

⁶ Instructions for Form EIA-176, available at https://www.eia.gov/survey/form/eia_176/proposed/instructions.pdf.

⁷ American Gas Foundation, *Renewable Sources of Natural Gas: Supply and Emissions Reduction Assessment* (Dec. 2019), at p. 1, available at <https://gasfoundation.org/wp-content/uploads/2019/12/AGF-2019-RNG-Study-Full-Report-FINAL-12-18-19.pdf>.

⁸ The definition proposed was developed by AGA and its members, and other stakeholders as a broad consensus definition. Individual companies may recognize additional specifications or requirements pertaining to gas quality standards on their operating systems.

⁹ The definition for “renewable natural gas” should be separate and distinct from the definition for “biogas.” The terms are not interchangeable. Biogas is the raw gas that has not been conditioned and is not pipeline quality. In comparison, and as discussed herein, the term “renewable natural gas” refers to pipeline compatible gas.

¹⁰ American Gas Foundation, *Renewable Sources of Natural Gas: Supply and Emissions Reduction Assessment* (Dec. 2019) at p. 1, *supra*.

¹¹ *Id.*

natural gas in the instructions will provide flexibility for including technologies in use today, as well as those developed in the future.

Regarding the applicability of Form EIA-176, the instructions state that “[p]roducers of high-Btu renewable natural gas that inject into an interstate or intra-state pipeline, or who deliver to a natural gas distributor.”¹² AGA’s concern with the applicability of the form is that it is unclear what is meant by “high-Btu renewable natural gas” as that term is not defined by EIA in the instructions. The instructions state, with regard to the heat content for gas delivered to customers, that “[t]he value for heat content is expected to be in the range of 900 to 1,200 Btu/cf.” It is not clear if EIA intends for the top of this range or above this range to indicate what is “high-Btu renewable natural gas” or where any demarcation line is to be set by EIA. A solution to this issue is to revise the instructions to state that Form EIA-176 applies to producers of “pipeline-compatible” or “pipeline-quality” renewable natural gas that inject into an interstate or intrastate pipeline, or who deliver to a natural gas distributor. This terminology would be consistent with EIA’s use of the term “pipeline quality” when referring to synthetic natural gas in Form EIA-176. Moreover, the operational reality is that if renewable natural gas is injected into the gas system it must meet the specifications of the pipeline or distribution system, which would include Btu levels, among other things. It is more appropriate for facility operators, as compared to EIA, to define what can be injected into their system, as those specifications would be approved by state public utility commissions or the Federal Energy Regulatory Commission. Operational matters and quality specifications are inherently fact specific and can be expected to vary in different parts of the country. The establishment of a granular national standard for renewable natural gas by EIA is not appropriate or necessary.

B. Form EIA-176 Should Collect Information on Hydrogen

AGA requests that EIA revise Form EIA-176 to gather information regarding hydrogen. Similar to renewable natural gas, discussed above, there is an increased desire to more fully incorporate hydrogen into the energy system. In October 2023, the Department of Energy announced \$7 billion to launch seven Regional Clean Hydrogen Hubs (“H2Hubs”) across the nation and accelerate the commercial-scale deployment of low-cost hydrogen.¹³ Natural gas utilities are participating in multiple H2Hubs¹⁴ and the natural gas industry has been busy working and learning how to use hydrogen within its current infrastructure.¹⁵ Moreover, some utilities

¹² EIA-176 Survey Form Instructions, available at

https://www.eia.gov/survey/form/eia_176/proposed/instructions.pdf.

¹³ DOE, “Biden-Harris Administration Announces \$7 Billion For America’s First Clean Hydrogen Hubs, Driving Clean Manufacturing and Delivering New Economic Opportunities Nationwide, October 13, 2023, available at

<https://www.energy.gov/articles/biden-harris-administration-announces-7-billion-americas-first-clean-hydrogen-hubs-driving#:~:text=WASHINGTON%2C%20D.C.%20%E2%80%94%20As%20part%20of,%20cost%2C%20clean%20hydrogen%E2%80%94>

¹⁴ See Attachment A to this comment, which is a map of the hydrogen hubs and the AGA members involved in each proposal. *See also*, S&P Global, “Gas utilities take step toward hydrogen future with DOE hub selections,” October 18, 2023, available at <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/gas-utilities-take-step-toward-hydrogen-future-with-doe-hub-selections-77956246>.

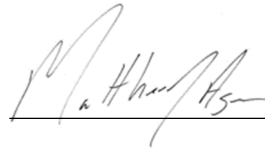
¹⁵ AGA, Innovation Through Hydrogen, available at <https://www.aga.org/natural-gas/environment/innovating-today-for-a-more-resilient-future/innovation-through-hydrogen/>.

already incorporate hydrogen into their distribution systems¹⁶ and others are planning to add the commodity to their systems in the near future. EIA has an opportunity to update Form EIA-176 so that it can start to gather and track the further integration of hydrogen into the energy system.

II. Conclusion

The American Gas Association respectfully requests that EIA consider these comments on this matter. AGA urges EIA to incorporate the above recommendations to assist market participants, policymakers, and filers.

Respectfully submitted,



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¹⁶ Hawai'i Gas, "Decarbonization and Energy Innovation," available at <https://www.hawaiigas.com/clean-energy/decarbonization> and New Jersey Natural Gas, "NJNG's Green Hydrogen Project," available at https://www.njsustainability.com/environmental/NJR_HydrogenProject_Factsheet_01d1.pdf.

**ATTACHMENT A
TO THE
COMMENTS OF
THE AMERICAN GAS ASSOCIATION**

Hydrogen Hubs Map



Pacific Northwest Hydrogen Hub

PNW H2
States: WA, OR, MT
AGA Utility Member Engagement:
Puget

California Hydrogen Hub

Alliance for Renewable Clean Hydrogen Energy Systems (ARCHES)
States: CA
AGA Utility Member Engagement:
SoCalGas, PG&E

Heartland Hydrogen Hub

Heartland Hub (HH2H)
States: MN, ND, SD
AGA Utility Member Engagement:
Xcel

Midwest Hydrogen Hub

Midwest Alliance for Clean Hydrogen (MachH2)
States: IL, IN, MI
AGA Utility Member Engagement:
Nicor (Southern), NiSource, Ameren Illinois

Appalachian Hydrogen Hub

Appalachian Regional Clean Hydrogen Hub (ARCH2)
States: OH, WV, PA
AGA Utility Member Engagement:
Dominion, Hope Gas (Hearthstone)

Mid-Atlantic Hydrogen Hub

Mid-Atlantic Clean Hydrogen Hub (MACH2)
States: PA, DE, NJ
AGA Utility Member Engagement:
Enbridge, Chesapeake, PGW, PSEG

Gulf Coast Hydrogen Hub

HyVelocity H2Hub
States: TX
AGA Utility Member Engagement:
ONE Gas, Entergy, CenterPoint, Avangrid

