



AMERICAN PUBLIC GAS ASSOCIATION

November 20th, 2020

Division of Air Quality
127 Cardinal Drive Ext.
Wilmington, NC 28405

Submission via email: DAQ.publiccomments@ncdenr.gov

Re: Align Energy

To whom it may concern,

The American Public Gas Association (APGA) is pleased to provide comments to the North Carolina (NC) Department of Environmental Quality's Division of Air Quality (DAQ) regarding the submitted air quality permit application from Align RNG, LLC. APGA is the trade association for approximately 1,000 communities across the U.S., including eight in NC, that own and operate their retail natural gas distribution entities. Public gas systems are not-for-profit and locally accountable to the citizens they serve. They are focused on providing safe, reliable, and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.

As individual states, and the country as a whole, pursue a clean energy future, the end use energy market should have access to lower carbon fuels, like renewable natural gas (RNG). APGA's NC members play a critical role in delivering North Carolinians the energy they need through an existing safe and reliable pipeline infrastructure, with an already trained and competent workforce. They desire to leverage this gas distribution network to enable the delivery of RNG. Some of APGA's NC members have been approached about injecting RNG into their systems and are considering, recognizing the environmental benefits of RNG and the demand by some Americans for a cleaner fuel.

Governor Cooper is leading other states in his efforts to support clean energy that will both advance the NC economy and help the environment. RNG is a proven, balanced energy solution that does exactly what Governor Cooper is aiming to achieve: further NC farms and businesses, while decreasing greenhouse gas (GHG) emissions. These objectives being accomplished while still using the existing, safe, and resilient pipeline infrastructure, ensuring sustainable energy for many years to come.

APGA requests that DAQ approve the air permit to allow this project to move forward. As well, as more RNG project permits come before the Division, APGA asks that they be approved. Public natural gas utilities look forward to utilizing the existing infrastructure to achieve North Carolina's clean energy future.

Respectfully submitted,

A handwritten signature in blue ink that reads "Dave Schryver". The signature is written in a cursive, flowing style.

Dave Schryver
President & CEO
American Public Gas Association