AMERICAN PUBLIC GAS ASSOCIATION

October 30th, 2020

Ms. Sarah Menassian
Program Manager, Methane Challenge Program
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submission via email: GasSTAR@epa.gov

Re: Finalizing a new Best Management Practice (BMP) commitment option for Supply of Renewable Natural Gas (RNG)

Dear Methane Challenge Program Managers:

The American Public Gas Association (APGA) is pleased to provide feedback on the Environmental Protection Agency's (EPA's) proposal to develop a new Best Management Practice (BMP) commitment option for reporting on supply of renewable natural gas (RNG) through natural gas transmission and distribution systems. APGA is the trade association for approximately 1,000 communities across the U.S. that own and operate their retail natural gas distribution entities. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies, all locally accountable to the citizens they serve. Public gas systems focus 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.

APGA is not offering feedback on the particular questions but would like to provide a couple general comments. Principally, APGA is encouraged to see EPA put forward this proposal recognizing that by transmitting and distributing RNG in their systems to end users, distribution companies are playing a valuable role in providing market access for methane recovery projects, and overall, decreasing emissions. A few public gas utilities are already incorporating RNG in their systems, acknowledging its environmental benefits. As well, RNG is a low or no carbon fuel that some Americans request for their homes, offices, and businesses. Some APGA members are already Partners in the Natural Gas STAR Methane Challenge program, and more are considering it. Proposing to track RNG will likely encourage others to join.

Another comment is related to a Partner only being able to report direct injections. APGA would like to suggest that EPA modify the BMP commitment option to allow utilities to report purchases of RNG made through their gas supply portfolio. Some APGA member systems may not be close to a production facility, either because they are in a dense urban area or a very rural location. With the lack of infrastructure connected to an RNG generation location, it will be relatively difficult to directly interconnect, so if the low or no carbon fuel was to be used, it would likely be through gas supply purchases that flow through an interstate pipeline system first. The goal of the BMP commitment

option is to support RNG use throughout the country. Allowing for companies to be recognized for purchases would go far in highlighting industry's proactive efforts to use RNG to protect America's environment.

Most importantly, APGA asks that EPA continue to support RNG use, recognizing this is an advancement to mitigate methane emissions that pipeline operators are undertaking. Especially for APGA members, this new BMP commitment option has the capability to better capture receipt and supply of RNG through voluntarily reporting and highlight the efforts of public natural gas utilities in methane reduction, both from their systems, as well as from surrounding facilities, such as landfills, wastewater treatment plants, and livestock farms.

In addition to the above comments, APGA supports all the input of the American Gas Association (AGA). APGA has worked for many years with this peer trade association stakeholder, and in this proceeding, would like to echo the feedback they have submitted. One specific comment APGA would like to reiterate is using AGA's consensus definition of RNG in the Program. AGA coordinated with the RNG Coalition and the American Biogas Council (ABC) in developing the following, ensuring "buy-in" from multiple stakeholders:

> ***Renewable natural gas (RNG) is any pipeline compatible gaseous fuel derived from biogenic or other renewable sources that has lower lifecycle CO2e emissions than geological natural gas.***

Public natural gas utilities are grateful for AGA, the RNG Coalition, and ABC developing and are supportive. As well, APGA believes this definition will allow for future continuous improvement of the Program, such as consideration for hydrogen. It does seem the current focus is on just biogas-based RNG, so below is another additional definition for "bio-RNG:"

> ***Bio-RNG for purposes of this BMP commitment option is defined as any pipeline compatible gaseous fuel derived from biogenic sources.***

If EPA desires further restrictions, APGA suggests modifying the list of biogenic sources found in the proposal under "Source Description." With this feedback on definitions, APGA's hope is to support EPA's intent for the Program currently but allow adequate flexibility for continuous improvement.

APGA members play a critical role in delivering Americans the energy they need through an existing safe and reliable pipeline infrastructure with an already trained and competent workforce. This gas distribution network can and should be leveraged to enable the delivery of renewable fuels, such as RNG. Public natural gas utilities look forward to working with EPA and the Natural Gas STAR Methane Challenge Program in utilizing the existing infrastructure to achieve America's clean energy future.

Respectfully submitted,

Dave Schryver
President & CEO
American Public Gas Association