



August 2, 2021

**Electronic Filing**

**Docket ID No. EPA-HQ-OAR-2016-0731**

**EPA ICR No. 2547.01, OMB Control No. 2060-0722**

**To: USEPA:** [www.regulations.gov](http://www.regulations.gov)

**To: OMB:** [www.reginfo.gov/public/do/PRAMain](http://www.reginfo.gov/public/do/PRAMain)

**Re: Information Collection Request Submitted to OMB for Review and Approval;  
Comment Request; EPA's Methane Challenge and Natural Gas STAR Programs  
(Renewal), 86 Fed. Reg. 35085 (July 1, 2021)**

The American Gas Association (AGA) appreciates the opportunity to submit these comments in response to the U.S. Environmental Protection Agency's (EPA) notice requesting comments in support of EPA's information collection request (ICR) to the Office of Management and Budget (OMB) for the renewal of EPA's voluntary Natural Gas STAR and Methane Challenge Programs.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 76 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. 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 thirty percent of the United States' energy needs.

AGA and many of our gas distribution members were founding participants in EPA's Natural Gas STAR program in 1993, and we have been committed to this voluntary technology and best practices program for reducing methane emissions for more than 20 years. AGA and our members also helped stand-up the EPA Methane Challenge program which calls on participating companies to set challenging best management practice (BMP) goals for adopting methane reduction "best management practices" (BMPs) across their operations under the BMP track of Methane Challenge, or in the alternative, to set goals for reducing emissions to achieve low methane intensity levels under the ONE Future track of the Methane Challenge Program. All the founding natural gas distribution participants in Methane Challenge are AGA member companies. The methane emissions strategies our members shared in Natural Gas STAR and the commitments they made in the Methane Challenge program have helped to reduce methane emissions from U.S. natural gas distribution systems by 69 percent from 1990 to 2019, down to just 0.1 percent of annual produced natural gas, as shown in the April 2021 GHG Inventory for 1990-2019.<sup>1</sup>

Looking forward, for the first time in this coming year, Methane Challenge will provide AGA members and others an opportunity to track and report on projects that capture methane that would otherwise be emitted from farms, landfills or wastewater facilities and clean it to pipeline quality Renewable Natural Gas (RNG). This information will help provide data needed by other AGA Climate Change Division programs such as AgSTAR and the Landfill Outreach Methane Program (LMOP).<sup>2</sup>

AGA strongly supports these voluntary programs and their contribution toward significantly reducing methane emissions. Our members do not find the information collected in these voluntary programs to be at all burdensome. We support the ICR renewal as well as the combination of EPA's ICR for Natural Gas STAR with the ICR for Methane Challenge, as this should promote efficiency. AGA urges the OMB to approve

---

<sup>1</sup> See AGA's Analysis of the 2021 Inventory: <https://www.aga.org/research/reports/epa-updates-to-inventory-ghg/>

<sup>2</sup> See <https://www.epa.gov/agstar> and <https://www.epa.gov/lmop>.

EPA's ICR request for renewal to ensure that both of these highly cost-effective voluntary programs can continue without interruption.

AGA appreciates the opportunity to comment. If you have any questions, please contact me 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 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)