



AMERICAN PUBLIC GAS ASSOCIATION

October 30th, 2020

Center for Resource Solutions
1012 Torney Ave. 2nd Floor
San Francisco, CA 94129
www.resource-solutions.org

Submission via email: comments@green-e.org

Re: Renewable Fuel Standard Comments

Dear Center for Resource Solutions:

The American Public Gas Association (APGA) is pleased to respond to the second, open comment period for the *Green-e Renewable Fuels Standard for Canada and the United States*. 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 members appreciate the Center for Resource Solutions (CRS) developing this standard, which provides requirements for the certification of renewable gas production, sales, and consumption. With this, more stakeholders in the end use energy market will consider renewable gas or renewable natural gas (RNG). APGA members are exploring ways to inject RNG into their systems, and a few already are, recognizing the environmental benefits of RNG and the demand by some Americans for a cleaner fuel. APGA participated in the first, open comment period recognizing the importance of this initiative. After reviewing the redline summary of changes to the standard, which were developed from input from APGA and others, there is concern that this current effort may result in a deliverable many natural gas distribution companies will not utilize. As well, some of the questions being asked in the second survey suggest CRS is deviating from the original intent. APGA is not providing responses to all the questions posed but feel it is important to offer the following, highlighting what is most concerning:

- APGA believes the proposed changes include irrelevant information on building electrification. In fact, it seems the standard is promoting building electrification through disclosure requirements. All forms of energy have a role to play in achieving our country's environmental goals, so endorsing one does not seem appropriate, especially for a standard for renewable gas.

In some situations, building electrification could cause more emissions by consumers.¹ That is not a goal for APGA members.

Another example of the superfluous building electrification topic being discussed is with question 5 from the second survey. It says, “What criteria should this Standard contain to both support electrification in the long term while supporting the ability of gas utility customers to use renewable fuels in place of fossil fuels?” This question wants criteria for electrification, but a renewable gas standard is being developed. What is the connection? Building electrification is beyond the scope, so this survey question is irrelevant. As well, as America innovates ways to protect our environment, it should not be at the expense of a customer’s fuel choice. APGA recommends that CRS not include the issue of electrification in any element of this standard. If the goal is truly to reduce greenhouse gas (GHG) emissions, forced electrification is not the solution.

- CRS is considering limiting the standard to include only large commercial and industrial customers. APGA strongly believes limiting to such a small subset of eligible participants, and excluding residential customers, is neither appropriate nor warranted. CRS should allow residential and small commercial customers to participate. Residential customers prefer gas, so there is significant potential for RNG.² Not including them limits the benefits to the environment that this standard could provide. As well, excluding residential and small commercial customers could limit utilities from participating, as these could be their primary customer base. There would be no incentive. APGA recommends that CRS include all residential, commercial, and industrial customers as eligible participants, to ensure our country benefits from using this low-carbon fuel.
- APGA does not believe that the standard should include a minimum monthly purchase amount for any customer group. The renewable gas market for thermal applications is still early in the development phase. Both production and demand are just starting to “ramp up,” so CRS should not place an arbitrary minimum purchase. Given the typically smaller size of APGA member systems, these utilities, more than any others, would likely not participate in the standard if there is a high minimum requirement. Others will likely see this as a hurdle, too.

In addition to the above comments, APGA supports the technical input of the American Gas Association (AGA). APGA has worked for many years with colleagues at this trade association, and in this proceeding, would like to echo the valuable feedback they have submitted. APGA strongly believes AGA’s input will further inform CRS in this effort.

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 gas. The changes seen in the standard and the survey questions concern APGA members, and we appreciate your consideration of our comments. Public natural gas utilities look forward to utilizing the existing

¹ Dichter, N., & Aboud, A. Analysis of Greenhouse Gas Emissions from Residential Heating Technologies in the USA. UC Davis Western Cooling Efficiency Center. <https://wcec.ucdavis.edu/wp-content/uploads/GHG-Emissions-from-ResidentialHeating-Technologies-091520.pdf>.

² Woodland, O’Brien, and Scott, “New Homeowner Energy Preference Survey,” <https://www.energysolutionscenter.org/>.

infrastructure to achieve America's clean energy future. Ensuring there are standards and certificate programs in place to assure the environmental integrity of the fuels used in the pipelines will be crucial.

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