



AMERICAN PUBLIC GAS ASSOCIATION

February 23, 2024

Submission via email: climate.strategies@mass.gov

Re: Greenhouse Gas Reporting Amendments

Dear MassDEP:

The American Public Gas Association (APGA) is pleased to provide input regarding revisions to the Greenhouse Gas Emissions Reporting regulation (310 CMR 7.71). APGA is the trade association for approximately 1,000 communities across the U.S. that own and operate their retail natural gas distribution entities, including Holyoke Gas and Electric, Westfield Gas and Electric Light Department, Wakefield Municipal Gas and Light, and Middleborough Gas and Electric in Massachusetts. They are not-for-profit and locally accountable to the citizens they serve, providing safe, reliable, affordable, and efficient energy to their customers. They 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.

We urge MassDEP to engage in robust stakeholder input to better understand the mechanics of, the purpose of, and the overall likely implication of these Proposed Amendments prior to implementation. APGA's members are committed to continuously improving practices and maintaining infrastructure to minimize greenhouse gas (GHG) emissions from their gas distribution systems. Their commitment to minimizing GHG emissions includes enhanced operations and maintenance practices specifically designed to protect people and the environment. The members are also planning for the use of new fuels, such as renewable natural gas (RNG) and hydrogen.

APGA's members in Massachusetts are not opposed to reporting GHG emissions that occur when customers consume fuel the local distribution companies (LDCs) supply. There just needs to be explicit instruction that LDCs would be required to report emissions only associated with the consumption of fuels sold by LDCs to customers. APGA would like to recognize that without knowing how the data will be used, reporting emissions based on sales can be misleading as emissions reductions from customers converting from higher emitting fuel sources could negatively portray a utility as their GHG emissions may actually increase while the whole community actually sees a benefit.

In addition to the general input offered above, APGA supports the technical feedback of Boston Gas Company d/b/a National Grid, NSTAR Gas Company d/b/a Eversource Energy, Eversource

Gas Company of Massachusetts d/b/a Eversource Energy, Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty, Fitchburg Gas and Electric Light Company d/b/a Unitil, and The Berkshire Gas Company, which was submitted on their behalf by Keegan Werlin LLP. While not all the regulations these investor-owned utilities must comply with are required for APGA's members, their feedback is still valuable. APGA strongly believes this input will further inform MassDEP in this effort.

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APGA would like to reiterate that the public gas utilities in Massachusetts and all our members are committed to providing efficient, reliable, and affordable energy, while protecting the environment and promoting equity with minimal disruption to consumer choice. As the state pursues revisions to the Greenhouse Gas Emissions Reporting regulation, where applicable, APGA requests consideration of the unique operating circumstances of Massachusetts's public gas utilities and encourages the continued utilization of their valuable infrastructure and experienced workforce in achieving the state's clean energy goals.

If you would like to discuss further, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Stuart Saulters
Vice President of Government Relations
American Public Gas Association