



## AMERICAN PUBLIC GAS ASSOCIATION

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**Comments Submitted By:**

Name: Stuart Saulters

Company or Organization: American Public Gas Association (APGA)

Email: [ssaulters@apga.org](mailto:ssaulters@apga.org)

Phone: 202-802-0493

Website: [www.apga.org](http://www.apga.org)

Location: Washington, DC; Members located in the following Illinois cities:

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**Question 1:** What topics should be further explored related to energy efficiency and electrification?

As the Illinois Commerce Commission (ICC) considers energy efficiency and electrification in relation to the future of gas in the state, APGA believes it is important to consider resiliency and reliability.

**Add Comments:**

APGA supports responsible climate conscious policies that incorporate an “all of the above” energy approach. Importantly, APGA and our members feel that not accounting for reliable and resilient access to energy is short-sighted and can harm consumers. Instead of phasing out natural gas, the state of Illinois should consider a revised approach to clean energy goals that maintains the utilization of natural gas, while also integrating renewable natural gas (RNG) and hydrogen. This strategy would enable Illinois to meet its climate targets while ensuring Illinois residents and businesses retain access to reliable and resilient energy. In addition, this path forward continues to utilize the investments the state has made in its existing public gas utility pipeline infrastructure and their competent workforce.

**Question 2:** What emission reduction technologies should be further explored?

Given that the underground pipeline infrastructure is already a safe, resilient, and reliable way to transport gas, APGA believes it would be valuable for the State to focus on innovations that help ensure electricity can continue to be provided to end-users when the electric grid is unavailable, especially if these innovations help to minimize emissions.

**Add Comments:**

Natural gas-fired back-up generators provide numerous families and essential services with a dependable source of power when the electrical grid is unable to deliver energy. While a gas generator already produces less emissions than one powered by diesel, innovations are being explored to lower emissions even further. One such example is a micro-combined heat and power (CHP) system. These systems are typically used in homes or smaller commercial applications and generate electricity by converting gas to power with minimal emissions while also capturing what would be waste thermal energy and instead utilizing it to heat the building.

Both gas-fired generators and CHP systems can also be fueled by renewable natural gas now, and research is ongoing to better understand the use of hydrogen in these systems. Further decarbonization is likely possible with additional research and innovation.

**Question 3:** Is there another category of Future of Gas workshop topics that should be added?

APGA believes the ICC, through these workshops, should ensure Illinois residents maintain their access to their preferred energy source that best suits their building, budget, and needs.

**Add Comments:**

A trustworthy and diverse energy supply is critical to both national and domestic security. We urge the state to be mindful of protecting Illinois's energy resiliency through the continued utilization of the pipeline infrastructure. Energy supplied by public gas utilities, like those in Illinois, play a critical role in ensuring energy resiliency in the communities they serve. A report by the Natural Gas Council reveals:

“The operational characteristics of the natural gas transportation network, in combination with the physical properties of natural gas, effectively minimize the likelihood and severity of service disruptions. In the rare event of a disruption, impacts are typically localized and brief. History demonstrates that disruption of firm pipeline transportation and/or storage services resulting from severe weather events are extremely rare.” (<http://naturalgascouncil.org/wp-content/uploads/2019/04/Natural-Gas-Reliable-and-Resilient.pdf>)

Also, GTI Energy found:

“Natural gas service disruptions are rare. On average, only 1 in 800 natural gas customers experience an unplanned outage in any given year. In comparison, electric system customers experience an average of one unplanned outage per year per customer.”

<https://www.gti.energy/wp-content/uploads/2018/11/Assessment-of-Natural-Gas-Electric-Distribution-Service-Reliability-TopicalReport-Jul2018.pdf>

Reliable natural gas is needed for Illinois households and businesses, and natural gas has and should continue to fill this need.

APGA would like to reiterate that the public gas utilities in Illinois 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 the future of gas, where applicable, APGA requests consideration of the unique operating circumstances of Illinois'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.