



AMERICAN PUBLIC GAS ASSOCIATION

April 29th, 2021

Mr. William Hohenstein
Director, USDA Office of Energy and Environmental Policy
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

RE: Notice of Request for Public Comment on the Executive Order on Tackling the Climate Crisis at Home and Abroad; Docket Number: USDA–2021–0003

Dear Mr. Hohenstein:

The American Public Gas Association (APGA) writes in response to the U.S. Department of Agriculture's (USDA's) notice soliciting "stakeholder input on a climate-smart agriculture and forestry strategy."

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 a strategic partner of NGV America and is pleased to offer its support for all the comments they have submitted in this proceeding related to the production of biofuels and renewable natural gas (RNG). We especially echo NGV America's comments encouraging USDA to play a leading role in promoting the production and use of RNG to address climate change and carve out a role for the agricultural community in our clean energy future. Following are a few specific points that APGA would like to reiterate from NGV America's submission.

APGA has been a strong supporter of the growth and development of the natural gas vehicle (NGV) industry. Our members supply gas to NGV fueling stations, and many also maintain and manage fueling stations or operations of their own.

NGVs are already some of the cleanest vehicles on the road with significantly lower greenhouse gas (GHG) emissions than those using gasoline or diesel engines. The newest NGVs available in the U.S. today also achieve ultra-low or near-zero emission levels of oxides of nitrogen and particulate matter, supporting the Administration's goals of lowering emissions of criteria pollutants in areas disproportionately impacted by urban air pollution. There has been growing interest from the transportation sector, among others, in increasing the use of RNG to lower GHG emissions. RNG now accounts for more than 53 percent of all natural gas motor fuel used in such vehicles, so continuing to promote the development and use of this fuel will only further advance the already existing environmental benefits of NGVs.

USDA is in a unique position to support the Administration's climate change goals while simultaneously providing support to the agriculture industry by promoting the continued use of biofuels and RNG in the transportation sector. Unlike other biofuels, RNG production does not come at a cost to producers by displacing food production or requiring producers to clear cut land. Because RNG is produced by capturing methane gas created by organic agricultural waste, developing RNG facilities instead provides producers with a new potential revenue stream that also addresses their waste disposal needs.

The ongoing conversation regarding transportation and climate change centers on electrification, with current policies favoring zero tailpipe emissions over the use of lower and potentially net-zero carbon RNG. This ignores the critical role biofuels could play in the nation's climate solution. Importantly, the increased use of biofuels and RNG can fill an important gap by providing an opportunity to reduce emissions in difficult to electrify applications like long-haul and regional trucking, transit buses, refuse trucks, and high horsepower off-road equipment. APGA believes that USDA could help change this misguided policy approach to electrification by encouraging state authorities, the U.S. Environmental Protection Agency, and other agencies to provide a level playing field for all clean vehicle fuels. For instance, existing regulations such as the Renewable Fuel Standard (RFS), Low-Carbon Fuel Standards (LCFS), and public utility commission rules on utility hookups and infrastructure investments have all played an important role in supporting the development of RNG, which has lowered transportation sector emissions. Similar policies and actions, as well as research and development funding, will ensure GHG emissions continue to decrease through the use of NGVs and more RNG fueling them.

APGA members play a critical role in delivering Americans the energy they need. Our gas distribution network and existing fuel delivery infrastructure can and should be leveraged to enable the delivery of RNG. Public natural gas utilities look forward to continuing to partner with USDA in furthering the role of RNG in America's clean energy future.

Respectfully submitted,



Dave Schryver
President & CEO
American Public Gas Association