

**BEFORE THE
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

Proposed Information Collection Request;
Renewal; EPA's Methane Challenge Program

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

**COMMENTS
OF THE
AMERICAN PUBLIC GAS ASSOCIATION**

The American Public Gas Association (APGA) submits the following comments for to the Environmental Protection Agency (EPA) regarding the "Proposed Information Collection Request (ICR); Renewal; EPA's Methane Challenge Program".¹ APGA is the trade association for approximately 1,000 communities across the U.S. that own and operate their retail natural gas distribution entities. APGA members 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 are committed to continuously improving practices and maintaining their infrastructure to minimize greenhouse gas emissions from natural gas distribution systems. APGA members are also committed to evaluating the use of "future fuels," such as Renewable Natural Gas (RNG) and hydrogen, in existing pipelines, utilizing the competent workforce. Voluntary programs, such as the EPA Gold Star program and the Methane Challenge, are important tools for natural gas distribution companies looking to enhance operations and minimize greenhouse gas emissions. The Challenge Commitments within the Methane Challenge Program provide tangible actions with measurable achievements for operators.

APGA supports the continuation of these important and impactful programs. APGA also supports merging the ICR for the EPA Natural Gas STAR and Methane Challenge Program² with an ICR specifically for the EPA's Natural Gas STAR Program³.

Respectfully Submitted,
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¹ Proposed Information Collection Request; Renewal; EPA's Methane Challenge Program. Environmental Protection Agency. FR Vol. 86 5,186.

² OMB Control No. 2060-0722. Natural Gas STAR Methane Challenge Implementation Program.

³ OMB Control No. 2060-0328. Natural Gas STAR Implementation Plan.