



AMERICAN PUBLIC GAS ASSOCIATION

June 29, 2020

Mr. Michael Kopalek
U.S. Energy Information Administration
1000 Independence Avenue SW, EI-25
Washington, DC 20585-0121

Submission via electronic filing

Re: Comments in Response to Energy Information Administration Notice and Request for Comments Pertaining to Proposed Extension and Changes of the Natural Gas Data Collection Program [85 Fed. Reg. 23511]

Dear Mr. Kopalek:

The American Public Gas Association (APGA) appreciates the opportunity to provide comments in response to the above referenced matter. APGA is the trade association for approximately 1,000 public gas utilities across the U.S., including municipal gas distribution systems, public utility districts, county districts, and other public agencies, all locally accountable to the citizens they serve. Public gas systems provide 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.

Because APGA members own and operate retail natural gas distribution entities, they are subject to certain reporting requirements under the Energy Information Administration's (EIA's) *Natural Gas Data Collection Program*. As EIA is proposing to extend the program with changes, we offer the below comments for your consideration:

1. Collection of Data from RNG Producers

EIA proposes to revise the instructions of Form EIA-176 – Annual Report of Natural and Supplemental Gas Supply and Disposition to explicitly include “producers of renewable natural gas or biogas, including landfill collection facilities, agricultural digesters, and wastewater treatment facilities” as required reporters. APGA is supportive of EIA's proposed change, which will ensure collection of valuable renewable natural gas (RNG) data. However, we would like to echo the comments of the American Gas Association (AGA), an industry stakeholder with whom APGA has worked with for many years. As AGA's comments note, a separate form may be more appropriate for collecting information on RNG, as opposed to simply modifying Form EIA-176. Additionally, EIA should ensure that a definition of RNG, inclusive of all current and potential RNG feedstocks and production technologies, is included in the relevant instructions. These recommendations will help EIA and other stakeholders better understand the evolving RNG market as it continues to develop.

2. Reporting Frequency for Certain LNG Facilities

EIA also proposes the addition of a new survey, Form EIA-191L - Monthly Liquefied Natural Gas Storage Report, which would become a required filing for “all companies that operate ... liquefied natural gas (LNG) storage facilities in the United States.” Again, APGA would like to echo AGA’s comments and request that EIA clarify which entities will be required to file this new form, that the reporting frequency of this form be modified, and that any confidential or sensitive business information pertaining to LNG storage facilities be handled appropriately.

As it reads now, several APGA members meet this broad definition, making monthly reporting requirements burdensome without any significant added value. As EIA develops definitions for the various LNG storage facilities, it should also determine appropriate corresponding reporting frequencies to ensure that the burden of reporting is justified by the benefit.

3. Data Collection to Inform DOE Rulemakings

Finally, APGA is also supportive of Spire Inc.’s (Spire’s) comments, which request that EIA also modify the *Natural Gas Data Collection Program* to ensure that adequate data is captured to best inform the Department of Energy’s (DOE’s) appliance energy efficiency program. EIA is best situated to collect relevant and timely data from utility tariff sheets that will help ensure DOE can comprehensively, transparently, and verifiably calculate the monetary savings associated with a proposed minimum efficiency standard, a substantial consideration underlying all of the agency’s appliance energy efficiency rulemakings. APGA believes that EIA can collect such information through changes to forms under the *Natural Gas Data Collection Program*, as Spire suggests.

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We thank you for your review and consideration of these comments as you proceed with extending and updating the *Natural Gas Data Collection Program*. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,



Dave Schryver
President & CEO
American Public Gas Association