Comment on Provisional Committee Appointments

The American Public Gas Association (APGA) represents approximately 1,000 retail natural gas distribution entities owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that own and operate natural gas distribution facilities in their communities. Public gas systems focus primarily on providing safe, reliable, and affordable natural gas service to their customers.

APGA appreciates the National Academy of Sciences, Engineering, and Medicine’s efforts to improve the analytical methods employed by the U.S. Department of Energy (DOE) in setting “standards regulations” through a peer review. APGA and its members have been closely involved with DOE’s setting of appliance minimum efficiency standards for many years.

APGA understands there is a current request to “Comment on Provisional Committee Appointments.” The association is concerned that the proposed membership may not have the broad balance necessary to achieve the Committee’s objective. For example, Mr. Gellings’ expertise is primarily electric power research, as are most of the other provisional members. Another individual (or individuals) that has knowledge in end use natural gas research, policy, and markets should be added to provide for more balanced results from this effort.  There are specific legal and technical aspects to the process for adopting minimum appliance efficiency standards, especially when it comes to natural gas as a fuel source.  As currently made up, this panel may not be able to fully provide comprehensive peer review.

As well, there was some time to share perspectives at the end of the November 20th open meeting, and the location for providing further feedback through the internet was highlighted to the attendees. If the Committee would like further presentations or clarification from APGA’s members, do not hesitate to reach out. Public gas utilities can be significantly impacted through appliance rulemakings and would be glad to detail these consequences.

APGA is happy to talk further with the Academy if there are any questions.

Respectfully Submitted,

Bert Kalisch

President and CEO