



## AMERICAN PUBLIC GAS ASSOCIATION

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Center for Resource Solutions  
1012 Torney Ave. 2nd Floor  
San Francisco, CA 94129  
[www.resource-solutions.org](http://www.resource-solutions.org)

Submission via email: [comments@green-e.org](mailto:comments@green-e.org)

Re: Renewable Fuel Standard Comments

Dear Working Group and Advisory Group Members:

The American Public Gas Association (APGA) is pleased to respond to the open comment period for the *Green-e Renewable Fuels Standard for Canada and the United States*. 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 members appreciate the Center for Resource Solutions (CRS) developing this standard and certification program. With this, more stakeholders in the end use energy market will consider renewable natural gas (RNG). For the purposes of these comments, RNG is defined as a pipeline compatible gaseous fuel derived from biogenic or other renewable sources that has lower lifecycle carbon dioxide equivalent (CO<sub>2</sub>e) emissions than geological natural gas.

APGA members are exploring ways to inject RNG into their systems, and a few already are, recognizing the environmental benefits of RNG and the demand by some American's for a cleaner fuel. APGA recognizes the importance of CRS and the Green-e standard and certification program and wants to engage in the development.

APGA commends this effort but cannot offer input on all the questions posed. It does, however, offer the following feedback in two areas:

- First, the definition for and specific term "Energy Attribute Certificate" should more clearly encompass the environmental attributes of RNG. In the current draft, it's not clear that the "environmental" attributes are what is being highlighted by the certificate. As well, including some mention of "gas" in the actual term would add specificity. Providing both these clarifications will ensure CRS's certificate is clear and distinguished from others. One example term for consideration would be "RNG Environmental Attribute Certificate."

- Second, biomass gasification, power-to-gas, and hydrogen are important production processes. APGA members want to allow for opportunities to provide all fuels to meet customer demands. If these are not added as production pathways now, APGA urges CRS to indicate its intention to expand the standard and certificate program to include these in the future.

While only offering these two comments at this time, it is the hope of APGA's members to be included and engaged with CRS in this effort moving forward. Public natural gas utilities look forward to utilizing the existing infrastructure to achieve America's clean energy future. Ensuring there are standards and certificate programs in place to assure the environmental integrity of the fuels used in the pipelines will be crucial.

Respectfully submitted,



Dave Schryver  
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American Public Gas Association