



February 23, 2023

Massachusetts Department of Environmental Protection
ATTN: Climate Strategies
100 Cambridge Street, STE 900
Boston, MA 02114

Via electronic delivery

RE: Greenhouse Gas Reporting Amendments 310 CMR 7.71

The Massachusetts Department of Environmental Protection (MassDEP) is proposing amendments to 310 CMR 7.71: Reporting of Greenhouse Gas Emissions and 310 CMR 7.75 Clean Energy Standard. The proposed amendments to 310 CMR 7.71 aim to (1) improve consistency between MassDEP's greenhouse gas (GHG) reporting program for facilities and the United States Environmental Protection Agency's (EPA's) GHG reporting program, (2) accurately document the transition of the greenhouse gas reporting program to a new MassDEP electronic reporting platform, and (3) remove unnecessary reporting requirements that have been identified as particularly burdensome for facilities.

The Northeast Gas Association (NGA)¹, and more specifically the Massachusetts' Municipal Gas System Operators, applaud MassDEP's efforts, and are appreciative of the opportunity to provide comments on the proposed rule. We are committed to working with MassDEP to achieve the above

¹ NGA is a regional trade association that focuses on pipeline safety and safety culture, education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA supports a culture of pipeline safety and environmentally responsible energy delivery practices. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its member companies provide natural gas service to 13 million customers in 9 states (CT, MA, ME, NH, NJ, NY, PA, RI, VT). For the purposes of this filing, Massachusetts' Municipal Gas System Operators include Holyoke Gas and Electric Department; Middleborough Gas and Electric Department; Wakefield Municipal Gas and Light Department; and Westfield Gas and Electric Light Department.

stated goals and to continue our work to achieve emissions reductions. To that end, we offer the following comments for consideration.

General Support for the Comments Submitted by the Massachusetts Collaborative of Local Gas

Distribution Companies

The Massachusetts' Municipal Gas System Operators have reviewed the comments submitted by Keegan Werlin LLP on behalf of the Massachusetts collaborative of Local Gas Distribution Companies (LDCs). In general, we believe these comments and proposed changes will help achieve the goals noted above. Specifically, we echo the LDCs' calls for MassDEP to:

- 1) Clarify the language in the Proposed Amendments regarding gas utility reporting obligations;
- 2) Ensure that the Proposed Amendments will not result in an inaccurate reporting of greenhouse gas emissions, which could inadvertently increase the cost of achieving the Commonwealth's emissions reduction requirements;
- 3) Consider the use of alternative or renewable fuels for heating and incorporate accurate, evidence-based emissions factors for these fuels into the requirements;
- 4) Ensure that the Proposed Amendments accurately account for lifecycle GHG emissions, including upstream abatements;
- 5) Streamline reporting of GHG emissions from heating fuels to be consistent with the AQ 32 reporting requirements.

Further, the Massachusetts' Municipal Gas Operators would emphasize that reporting emissions based on sales can be misleading as business load can greatly fluctuate depending upon sales demand and emissions reductions from customers converting from higher emitting fuel sources could potentially lead to higher reporting for a utility, despite overall emissions going down.

Conclusion

NGA applauds MassDEP's efforts, and we appreciate the opportunity to provide comments on behalf of our Massachusetts' Municipal Gas System Operator Members. Our Massachusetts' Municipal Gas System Operator Members have long been committed to reducing emissions in their operations, and look forward to continuing in these efforts alongside MassDEP. In response to MassDEP's request for comments, we echo the comments submitted by Keegan Werlin on behalf of the LDCs and appreciate your consideration.

Thank you for the opportunity to submit these comments,



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