The Northeast Gas Association (NGA) appreciates the opportunity to comment on EPA’s proposed rule on carbon emission guidelines for existing electric generating units. On June 2, 2014, the U.S. Environmental Protection Agency (EPA), under President Obama’s Climate Action Plan, introduced its “Clean Power Plan” proposal plan to cut carbon pollution from existing power plants.

NGA is a non-profit trade association of natural gas companies. Our members are the local gas distribution companies that serve the states of Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island and Vermont. Our members also include interstate pipeline companies that transport natural gas into the region; liquefied natural gas (LNG) suppliers; and other industry participants. Collectively, our members serve approximately ten million customers in the Northeast U.S. Our web site is www.northeastgas.org.

Natural gas currently is the leading fuel source for power generation in the Northeast states, and also leads the proposed “generator queues” for prospective new power plants in the three Northeast electric operating systems. It has contributed to reduced air emissions across the board over the last decade. As EPA plans for this new rule that will in all probability lead to increased natural gas generation as one option across the country, we encourage EPA to consider the need for sufficient gas infrastructure to meet power generation sector requirements, and thereby help achieve the Plan’s economic, environmental and reliability goals.

NGA also wishes to express support for comments submitted in this docket by the American Gas Association (AGA) concerning the identification of combined heat & power as a cost-effective compliance option, as well as the value of natural gas as a “direct use” energy source with high efficiency and thus high environmental value.

Finally, NGA encourages EPA to maintain its focus on compliance flexibility as enunciated in the proposed Plan, to enable states and regions to frame carbon emissions guidelines that are suitable and practicable.

We hope that our comments will assist EPA as it considers development of this proposal.

Sincerely,

Stephen Leahy
Vice President, Policy