November 26, 2013

Mr. Russ Brauksieck  
NYSDEC  
NY Division of Environmental Remediation  
625 Broadway  
Albany, NY 12233-7020

Comments on Proposed 6 NYCRR Part 570 –  
Regulation of Liquefied Natural Gas Facilities

Via email

Dear Mr. Brauksieck:

The Northeast Gas Association (NGA) is pleased to provide comments on the Proposed 6 NYCRR Part 570 - Regulation of Liquefied Natural Gas Facilities. We support the proposed regulations.

NGA is a non-profit trade association of natural gas companies, based in Needham, MA. Our members are the local gas distribution companies (LDCs) that serve the states of New York, Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, 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. Our web site is www.northeastgas.org.

The proposed regulation will promulgate criteria for the siting of liquefied natural gas (LNG) facilities in New York State, and the form and content of permit applications. As the Department of Environmental Conservation (DEC) stated in its announcement of this proposal: “This rulemaking will establish a program that addresses the renewed interest in locating LNG facilities (particularly heavy-duty truck fueling facilities) in the State, and allow the siting, construction, and operation of such facilities.”

NGA notes that LNG facility siting has long been permitted in states that neighbor New York, from New Jersey to the New England states. The use of LNG for heavy-duty trucking fleets is advancing in the Northeast and throughout the U.S. and Canada. LNG as a transportation fuel is resulting in lower costs and lower emissions for fleets. As the DEC announcement states: “Use of LNG in heavy-duty trucks has environmental advantages over the use of diesel fuel because of reduced greenhouse gas and other emissions. Most other states permit LNG storage, conversion and transportation.”

LNG transportation is conducted safely and efficiently in the Northeast. As noted by DEC, the use of LNG for transportation provides significant economic and environmental benefits.
LNG and compressed natural gas (CNG) facilities are also providing a supply option for areas in the Northeast, such as northern New England, without access to a distribution or pipeline system.

NGA believes that New York State is acting prudently with these proposed regulations, and expresses its support.

Sincerely,

Thomas M. Kiley
President and CEO