

October 19, 2010



The Honorable Cathy Zoi
Assistant Secretary
Energy Efficiency and Renewable Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Statement of Policy for Adopting Full-Fuel-Cycle Analyses Into Energy Conservation Standards Program
Docket No. EERE-2010-BT-NOA-0028; RIN 1904-AC24

Dear Ms. Zoi:

The Natural Gas Supply Association ("NGSA") supports the October 19, 2010, comments filed on behalf of the American Gas Association ("AGA") in response to the proposed policy of the U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy ("DOE") to adopt a full-fuel-cycle analysis into its energy conservation standards program.¹

NGSA represents integrated and independent companies that produce and market approximately 40 percent of the natural gas consumed in the United States. Established in 1965, NGSA encourages the use of natural gas within a balanced national energy policy, and promotes the benefits of competitive markets to ensure reliable and efficient transportation and delivery of natural gas and to increase the supply of natural gas to U.S. customers.

As pointed out in AGA's detailed comments, NGSA supports DOE's proposal to incorporate a full-fuel-cycle ("FFC") analysis into its assessments of the energy consumption and emissions impacts of energy conservation standards. The DOE's proposal to use FFC measures of energy consumption, greenhouse gases ("GHGs"), and other emissions in the DOE analyses that inform energy efficiency standards will help

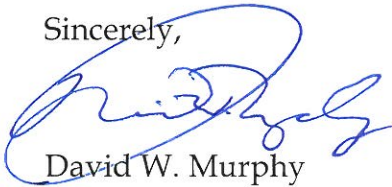
¹ Docket No. EERE-2010-BT-NOA-0028; RIN1904-AC24
Federal Register, Vol. 75, No. 161, August, 20, 2010, pp. 51423-51428

consumers make more knowledgeable purchasing decisions by educating them on the full impact of their energy choices. FFC analysis includes information about the energy consumed in extracting, processing and transporting primary fuels and the energy losses associated with generation, transmission, and distribution of electricity in addition to point-of-use energy. NGSAs support providing customers with the environmental impact information they need to make smart decisions about the appliances they purchase.

NGSA supports DOE's proposed use of the GREET model to derive FFC conservation factors. The GREET model provides an adequate modeling platform for the calculation of energy consumption and greenhouse gas ("GHG") data and produces appropriate conversion factors for DOE's impact and environmental assessments. As highlighted in the joint gas association letter of September 30, the natural gas interests represented are united in the belief that the GREET model produces appropriate conversion factors for the Department's purposes as set forth in the notice.²

Thank you for considering this letter and AGA's detailed comments. NGSAs are encouraged by DOE's efforts to move toward a full-fuel-cycle measure of energy consumption. If you have any questions or comments, please feel free to contact me directly at (202) 326-9301 or via email at dmurphy@ngsa.org.

Sincerely,



David W. Murphy
Manager, Energy Markets &
Government Affairs
Natural Gas Supply Association
www.ngsa.org

Cc: Ms. Brenda Edwards, Building Technologies Program

² See attached



September 30, 2010

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Re: Energy Conservation Program for Consumer Products and Certain Commercial and Industrial Equipment: Public Meeting and Availability of Statement of Policy for Adopting Full-Fuel-Cycle Analyses Into Energy Conservation Standards Program, 75 Fed. Reg. 51,423 (Aug. 20, 2010).

Dear Assistant Secretary Zoi:

We the undersigned natural gas trade associations and organizations wish to express our support for the Department of Energy's (DOE) proposed policy to incorporate full-fuel-cycle analyses into the development of energy conservation standards. We believe DOE should make every effort to provide information to the public regarding the total energy usage and environmental impacts of their end-use appliance choices.

While we intend to submit more substantial comments in the time frame established in the notice, we are writing now to emphasize our support for DOE's intent to supplement its current use of the National Energy Modeling System (NEMS) with its proposed use of the Greenhouse Gases, Regulated Emissions, and Energy Use In Transportation (GREET) models. The natural gas interests represented by our associations and organizations are united in the belief that these

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models produce appropriate conversion factors for DOE's purposes as set forth in the notice. As with all models, refinements can be made regarding some of the assumptions, and more accurate and updated information can be added as it is developed. Nonetheless, we believe that the conversion factors produced by the models adequately reflect the differences in energy consumption and emissions among the various fuel sources. Accordingly, we support DOE's proposal to supplement its current use of the NEMS model with the GREET model to incorporate full-fuel-cycle analyses into the development of energy conservation standards.

Thank you for your consideration.

Sincerely,

American Exploration and Production Council
American Petroleum Institute
America's Natural Gas Alliance
Gas Technology Institute
Interstate Natural Gas Assn. of America
Natural Gas Supply Association
US Oil & Gas Association

American Gas Association
American Public Gas Association
Center for Liquefied Natural Gas
Independent Petroleum Assn. of America
National Ocean Industries Association
Natural Gas Vehicles for America