



December 15, 2014

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-21
Fossil Fuel-Generated Energy Consumption Reduction for New Federal
Buildings and Major Renovations of Federal Buildings
EERE-2010-BT-STD-0031
1000 Independence Avenue, SW
Washington DC 20585

ELECTRONIC FILING SENT VIA EMAIL

RE: Notice of Proposed Rulemaking for Fossil Fuel-Generated Energy
Consumption Reduction for New Federal Buildings and Major
Renovations of Federal Buildings

Dear Ms. Edwards,

The Natural Gas Supply Association is deeply concerned with the DOE restriction on fossil fuel-generated energy consumption in new and renovated federal buildings. Implementation of such a restriction would deprive American energy consumers and taxpayers of the benefits of one of the most economical and environmentally beneficial domestic fuels - natural gas. History has shown that balanced, diversified energy portfolios benefit consumers and that competitive markets spur cost-effective, long-term investments.

U.S. marketed natural gas production surpassed all time record levels in 2011, currently exceeding 70 billion cubic feet per day, and it is still growing. In fact, in 2014, the U.S. led the world in natural gas production. Over the last five years, Lower-48 marketed natural gas production levels have increased more than 25 percent, paving the way for U.S. manufacturing growth and reducing carbon emissions from the electric generation sector. Growth in natural gas supplies, expansive natural gas delivery infrastructure, unrivalled natural gas storage capability, and robust natural gas commodity markets have facilitated increased use of natural gas by U.S. industry and utilities. The economic and environmental benefits of natural gas are recognized by the market. Its use in federal buildings should not be restricted.

Energy investment decisions are typically capital-intensive and long-term in nature. A one-size-fits-all solution for federal buildings would limit energy investment decisions to an artificially narrow set of options, not just for today, but for the life of the investments. Technologies and capabilities change. For instance, as technology has improved, the ability to detect and extract natural gas has also improved, boosting resource estimates. If the 1966 resource estimate of 600 trillion cubic feet (TCF) had remained static, the U.S. would have run out of natural gas 10 years ago. Instead, estimates doubled by 2002 and in 2013 grew to nearly 2,400 TCF.

Competitive energy markets facilitate energy efficiency and diversity in energy portfolios, benefiting customers. Market-driven consumption of natural gas in the U.S. industrial sector now exceeds pre-recession levels, driving an economic revival of U.S. manufacturing. Additionally, market-driven use of natural gas to generate electricity helped the U.S. reduce power sector carbon emissions to levels below those of 2005. The natural gas shale revolution has caused U.S. industry and power generation to rethink the role of natural gas. Perhaps the government should also rethink the role of natural gas. Absent a crystal ball, competitive market forces yield the best long-term investment decisions.

NGSA is a trade association that represents integrated and independent companies that produce and market domestic natural gas. Established in 1965, NGSA encourages the use of natural gas within a balanced national energy policy, and promotes the benefits of competitive markets, thus encouraging increased supply and the reliable and efficient delivery of natural gas to U.S. customers.

NGSA looks forward to participating in the Department of Energy discussions about natural gas markets and natural gas's role in achieving efficiency and environmental objectives. If we can provide any additional information, please do not hesitate to call.

Sincerely,



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