

## **Downstream Initiative Statement on the Launch of the Natural Gas STAR Methane Challenge Program**

March 30, 2016

For Immediate Release

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The Downstream Natural Gas Initiative (Downstream Initiative) applauds EPA for the successful launch of the Natural Gas STAR Methane Challenge Program. The Downstream Initiative looks forward to continuing to advance best management practices that can substantially reduce methane emissions and support safe, reliable, and cost-effective natural gas service.

Downstream Initiative members appreciate the open and inclusive stakeholder process EPA employed during the development of this voluntary program. EPA staff actively engaged with stakeholders to develop a program that clearly identifies the priority methane sources, mitigation options, and reporting data elements to track partner progress over time. These elements provide a solid foundation to build on going forward as partners learn more about methane sources and mitigation options.

The Methane Challenge Program Best Management Practice Commitment Option strikes the right balance of rigor, flexibility, and transparency. The 5-year implementation time line will allow companies time to gather and analyze data, evaluate and develop mitigation approaches, engage stakeholders, and secure approval from their public utility commissions for rate recovery and implement the BMP.

“In order for natural gas utilities to make additional investments to accelerate the pace of methane emission reductions, supporting state regulatory structures and cost recovery mechanisms are critical. Public recognition through the Methane Challenge Program will help support the efforts of natural gas utilities to communicate the value of operational excellence and methane emission reductions to regulators, consumer advocates, customers, and environmental organizations,” said Robert LaCount, Executive Vice President at MJB&A.

“Downstream Initiative member companies are committed to working with EPA on the successful implementation of the Methane Challenge Program for the natural gas distribution segment. In addition, Downstream Initiative members support EPA’s consideration of adding additional BMP sources and mitigation measures to the Methane Challenge Program over time,” said LaCount.

*The Downstream Natural Gas Initiative, a collaborative effort facilitated by M. J. Bradley & Associates, is made up of a group of leading natural gas utilities collaborating to address key technical, regulatory, and workforce challenges affecting methane emission reduction opportunities from the natural gas distribution segment. Members include Consolidated Edison Company of New York, Inc., National Grid, Pacific Gas & Electric, Southern California Gas Company, and Xcel Energy.*