

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Administrator Zeldin –

Attached please find a letter from Karen Harbert, President and CEO of the American Gas Association. Please do not hesitate to contact me if you or your staff have any questions.

Best regards,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



February 4, 2025

The Honorable Lee M. Zeldin  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Congratulations and Request for Introductory Meeting**

Dear Administrator Zeldin:

As President and CEO of the American Gas Association (“AGA”), I would like to congratulate you on your bipartisan confirmation and swearing-in as EPA Administrator. AGA and EPA have a long history of working together to achieve shared environmental objectives and leverage our collective expertise to design programs and initiatives to solve complex challenges.

AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more 189 million Americans and 5.8 million businesses in all fifty states. There are more than 79 million residential, commercial, and industrial natural gas customers in the United States, of which 94 percent—more than 74 million customers—receive their gas from AGA members. Today, natural gas meets more than one third of energy needs within the United States. Natural gas has been and will continue to be the cornerstone of America’s economy and energy independence.

AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Our industry is committed to investing, building, and innovating for the families and businesses who depend on us every minute of every day — a task that is inextricably connected to our members’ commitment to protecting the environment. According to EPA’s Greenhouse Gas Inventory, U.S. natural gas distribution segment methane emissions have decreased by 70 percent from 1990 to 2022 while the segment has grown in size: there were 1,352,384 miles of natural gas distribution mains in 2022—an increase of 480,227 miles (55 percent) since 1990—and more than one new residential customer signs up for natural gas service every minute.

On behalf of our members and staff, AGA looks forward to working with you and your team to advance our shared environmental and energy priorities. As such, I would like to request a meeting with you to introduce AGA and outline our top issues for the agency. If your staff has any questions, please have them contact Jennifer Baseman, AGA Senior Counsel for Environment, at [jbaseman@aga.org](mailto:jbaseman@aga.org). or 202-824-7340. I will follow up with your office to schedule our meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Harbert", is written over a faint, dotted-line signature strip.

Karen Harbert  
President and Chief Executive Officer  
American Gas Association

Cc: Eric Amidon, Chief of Staff

Message

---

**From:** Amidon, Eric [Amidon.Eric@epa.gov]  
**Sent:** 2/10/2025 4:10:39 AM  
**To:** Golinsky Baseman, Jennifer [jbaseman@aga.org]; Zeldin, Lee [Zeldin.Lee@epa.gov]  
**Subject:** Re: American Gas Association letter to Administrator Zeldin

Thank you!

---

**From:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Sent:** Tuesday, February 4, 2025 5:06 PM  
**To:** Zeldin, Lee <Zeldin.Lee@epa.gov>  
**Cc:** Amidon, Eric <Amidon.Eric@epa.gov>  
**Subject:** American Gas Association letter to Administrator Zeldin

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Administrator Zeldin –

Attached please find a letter from Karen Harbert, President and CEO of the American Gas Association. Please do not hesitate to contact me if you or your staff have any questions.

Best regards,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

Message

**From:** Golinsky Baseman, Jennifer [jbaseman@aga.org]  
**Sent:** 2/12/2025 9:30:09 PM  
**To:** Abboud, Michael [abboud.michael@epa.gov]  
**CC:** Farrell, Carolyn [CFarrell@aga.org]  
**Subject:** AGA meeting request  
**Attachments:** 2025-01-16 AGA Letter to EPA Transition Team\_January 2025.pdf;  
AGA\_Priorities\_Letter\_Trump\_119th\_Congress.pdf

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I just left you a voicemail but wanted to follow up by email as well. AGA's President and CEO, [Karen Harbert](#), is hoping to schedule a meeting with the Administrator to discuss AGA's environmental priorities and how our trade association can be helpful to EPA. AGA Board Chair [Lloyd Yates](#) of NiSource may wish to participate in the meeting as well, depending on his schedule.

In case you have not seen them yet, I am attaching AGA's January 16 letter to the EPA Transition Team and AGA's broader letter to the Administration and 119<sup>th</sup> Congress regarding our organization's priorities. I anticipate that Karen and Lloyd will want to discuss these issues with Administrator Zeldin in their meeting.

I am copying Carolyn Farrell, Manager of the AGA President's Office, to help with meeting scheduling. Please let me know if there is any additional information I can provide that would be helpful.

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



January 16, 2025

Mr. Adam Gustafson

Mr. Joel Brubaker

Ms. Nicole Dooley

Dear Members of the U.S. Environmental Protection Agency Transition Team:

Thank you for the opportunity to share the American Gas Association's ("AGA") priorities regarding the U.S. Environmental Protection Agency. AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more 189 million Americans and 5.8 million businesses in all fifty states. There are more than 79 million residential, commercial, and industrial natural gas customers in the United States, of which 94 percent—more than 74 million customers—receive their gas from AGA members. Today, natural gas meets more than one third of energy needs within the United States.

AGA members are subject to regulation under a number of EPA statutes—primarily the Clean Air Act and Clean Water Act. As a result, AGA's top-priority policy recommendations for EPA largely focus on those two statutes and related actions. We look forward to working closely with the incoming administration on these and other environmental regulatory issues of importance to AGA members and the natural gas industry as a whole.

### **Shut Down Improper Efforts to Use the Clean Air Act to Ban Natural Gas**

Over the past several years, attempts to use the Clean Air Act to enact federal natural gas bans have been on the rise. AGA urges EPA to take decisive and legally durable actions to deny these requests and send a clear signal that natural gas end uses cannot be banned under the Clean Air Act. In particular, AGA recommends that EPA take the following actions:

***Deny Sierra Club rulemaking petition for heating appliance NSPS.*** In August 2022, the Sierra Club and 25 other groups petitioned EPA to list heating appliances as a source category under Section 111(b)(1)(A) of the Clean Air Act and to issue New Source Performance Standards ("NSPS") for that source category under Section 111(b)(1)(B).<sup>1</sup> As detailed in AGA's September 2022 response to the petition,<sup>2</sup> the suggested "heating appliances" category does not qualify as a source category under Section 111, and even if it did, the petition fails to demonstrate that emissions from the "category" endanger public health and welfare. Further, the NSPS requested by the petition would be unlawful for several reasons, including that it would violate the Energy Policy Conservation Act ("EPCA") and would require the kind of generation-shifting activity expressly prohibited under Section 111 by *West Virginia v. EPA*, 142 S.Ct. 2587 (2022). To date, the petition is still pending action by EPA. AGA urges EPA to deny the petition for the reasons set out in AGA's September 2022 response.

***Deny California's request to incorporate the Bay Area's gas appliance ban into its SIP.*** In November 2024, EPA proposed to approve the Bay Area Air Quality Management District gas-fired furnace and water heater ban into California's state implementation plan ("SIP"), which would make the ban federally enforceable

<sup>1</sup> [www.sierraclub.org/sites/default/files/Sierra%20Club%20Heating%20Appliance%20Rulemaking%20Petition.pdf](http://www.sierraclub.org/sites/default/files/Sierra%20Club%20Heating%20Appliance%20Rulemaking%20Petition.pdf).

<sup>2</sup> [https://www.aga.org/wp-content/uploads/2022/12/final-cover-letter-and-aga-response\\_SIERRA.pdf](https://www.aga.org/wp-content/uploads/2022/12/final-cover-letter-and-aga-response_SIERRA.pdf).

under the Clean Air Act within the Bay Area.<sup>3</sup> EPA should deny this SIP revision request because the agency may not approve a SIP revision that incorporates unlawful state measures, and the measures in question are preempted by EPCA. Disapproving this SIP revision would set an important precedent that EPA will not approve these kinds of actions, several of which are under development in other jurisdictions in California and around the country. AGA plans to submit detailed comments in opposition to the proposed rule and providing a legal basis for EPA to disapprove of the requested SIP revision.

### **Preserve and Improve Programs Providing GHG Data and Analysis**

For years, EPA has compiled and published greenhouse gas (“GHG”) emissions data and analysis that AGA and its members rely on to demonstrate the incredible progress our industry has made in voluntarily reducing methane emissions. Having the GHG Reporting Program (“GHGRP”) and the Inventory of U.S. GHG Emissions and Sinks (“GHG Inventory”) available as centralized, commonly accepted sources of GHG data allows AGA to proudly and unequivocally demonstrate that U.S. natural gas distribution systems have reduced methane emissions by 70 percent from 1990 to 2022, bringing the distribution segment’s methane emissions down to 0.12 percent of throughput, all while the segment has grown in size.<sup>4</sup> Natural gas companies depend on this data to provide information regularly sought by investors, customers, and other stakeholders—including via AGA’s Natural Gas Sustainability Initiative (“NGSI”) Methane Emissions Intensity Protocol,<sup>5</sup> a voluntary methane intensity reporting tool that relies heavily on GHGRP and GHG Inventory data and methodologies. AGA encourages EPA to maintain these information repositories and make key improvements described below:

***Expand the use of facility-specific emission factors and advanced measurement technologies in the GHGRP.*** The May 2024 revision to Subpart W of the GHGRP was a positive first step toward allowing a greater use of empirical data in GHGRP reporting.<sup>6</sup> In future revisions to the program, EPA should allow for increased use of facility- and company-derived emission factors and advanced methane measurement technologies in Subpart W. AGA’s reasoning for these recommendations was shared with the agency in November 2024 comments on EPA’s request for information regarding methane quantification methodologies for Subpart W and the GHGRP at large.<sup>7</sup>

***Address the methodological uncertainties in the GHG Inventory estimates for post-meter GHG emissions.*** AGA has identified several significant data gaps and uncertainties in how EPA estimates post-meter emissions (*i.e.*, emissions from residential and commercial appliances, industrial facilities and power plants, and natural gas-fueled vehicles) in the GHG Inventory.<sup>8</sup> Having accurate post-meter emissions data

---

<sup>3</sup> Air Plan Conditional Approval; California; Bay Area Air Quality Management District, 89 Fed. Reg. 94,633 (Nov. 29, 2024), <https://www.govinfo.gov/content/pkg/FR-2024-11-29/pdf/2024-27518.pdf>.

<sup>4</sup> According to EPA’s 2024 GHG Inventory, there were 1,352,384 miles of natural gas distribution mains in 2022—an increase of 480,227 miles (55 percent) since 1990.

<sup>5</sup> For more information about NGSI, please visit <https://www.aga.org/research-policy/natural-gas-esg-sustainability/natural-gas-sustainability-initiative-ngsi>.

<sup>6</sup> Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems, 89 Fed. Reg. 42,062 (May 14, 2024), <https://www.govinfo.gov/content/pkg/FR-2024-05-14/pdf/2024-08988.pdf>.

<sup>7</sup> AGA and American Public Gas Association Comments on August 2024 GHGRP Subpart W RFI (Nov. 27, 2024), <https://www.regulations.gov/comment/EPA-HQ-OAR-2024-0350-0062>.

<sup>8</sup> In brief, these data gaps and uncertainties include (1) a lack of consensus standard test methods and practices for measuring emissions from end-use gas appliances, (2) the use of a limited set of studies conducted on a small sample of homes as a basis for a national emissions estimate, (3) data gaps, uncertainties, and notable differences between the available studies, (4) insufficient reproducibility of methods or attention to key variables like seasonal

is essential to informing the public about the important role and benefits of natural gas in reducing GHG emissions and avoiding misconceptions based on inaccurate, misinterpreted, or misused data. AGA urges EPA to address these gaps and uncertainties in future versions of the GHG Inventory and to use the improved methodology to revise post-meter emissions data from prior years' annual GHG Inventory reports.

### **Maintain and Clarify Existing Clean Air Act Program Exemptions for the Natural Gas Distribution Segment**

We anticipate that EPA will take action to modify several key air rules during the incoming administration, including those listed below. As EPA works to improve those regulatory programs, AGA requests that the agency take care to preserve the following existing exemptions that apply to the natural gas distribution segment:

***Exclude LDC operations from the Oil and Gas NSPS / Existing Source Emission Guidelines.*** The March 2024 final rule amending the methane NSPS for new, reconstructed, and modified sources in the Oil and Natural Gas Source Category (40 C.F.R. Part 60, Subparts OOOOa and OOOOb) and establishing methane emission guidelines for existing sources in the source category (Subpart OOOOc) maintained the longstanding exclusion of “[f]acilities located inside and including the Local Distribution Company (LDC) custody transfer station.” AGA urges EPA to maintain this exclusion and the accompanying clarifying regulatory language regarding affected facilities.

***Exclude LDC operations from the Good Neighbor Rule.*** The June 2023 federal implementation plan (“FIP”) addressing several states’ outstanding interstate transport obligations under the 2015 8-hour ozone national ambient air quality standards (*i.e.*, the Good Neighbor Rule) purported to exclude reciprocating internal combustion engines (“RICE”) located inside or downstream of an LDC custody transfer station—according to EPA’s Response to Comments (“RTC”) document for this rulemaking. However, the regulatory text of the FIP was insufficiently clear on this point and left too much room for misinterpreting the FIP to apply to the RICE used by some LDCs to transport natural gas through intrastate pipelines. In future rulemakings addressing the Good Neighbor Rule, EPA should clarify that RICE used for natural gas distribution are not subject to this FIP.

***Exclude PHMSA-regulated facilities and equipment from RMP requirements.*** EPA last revised the Risk Management Program (“RMP”) regulations under Section 112(r) of the Clean Air Act in March 2024. In so doing, EPA maintained the longstanding RMP exclusion for facilities and equipment used in transportation and storage incident to transportation that are subject to the Pipeline Safety and Hazardous Materials Safety Administration (“PHMSA”) regulations at 49 C.F.R. Parts 192, 193, or 195 (or are subject to a state natural gas or hazardous liquid program that is certified by PHMSA under 49 U.S.C. § 60105). AGA urges EPA to maintain this exclusion in any future revisions to the RMP regulations.

### **Assert and Maintain EPA’s Primacy in Regulating GHG Emissions**

During the Biden Administration, a number of federal agencies other than EPA attempted to enter the realm of regulating GHG emissions. For example, in its Gas Pipeline Leak Detection and Repair rulemaking, PHMSA proposed to regulate methane leak emissions from natural gas distribution and transmission pipelines, underground natural gas storage facilities, and liquefied natural gas (“LNG”) facilities in a manner

---

temperature and weather changes, and (5) inattention to the phase-out of pilot lights from many natural gas applications over the past few decades. AGA provided detailed comments to EPA on these issues in March 2022. See AGA Comments on the Public Review Draft 2022 Inventory of U.S. Greenhouse Gas (GHG) Emissions and Sinks (1990-2020) (Mar. 17, 2022), <https://www.regulations.gov/comment/EPA-HQ-OAR-2022-0001-0023>.

that would exceed PHMSA’s authority as a safety regulator and, in some instances, would duplicate or potentially conflict with EPA’s own methane regulations. EPA is the lead federal environmental regulator and should be working with other agencies to ensure that they do not undermine or usurp EPA’s authority as the primary federal regulator of GHG emissions—particularly to ensure that regulated entities in the natural gas industry and other sectors of the economy are not subject to duplicative or conflicting requirements.

### **Take Regulatory Action to Improve Environmental Permitting and Advise Congress on Broader Legislative Permitting Reforms**

As the incoming administration is well aware, it has become too difficult to build new energy infrastructure in America, due largely to the byzantine environmental permitting process that imposes unnecessary and detrimental delays, followed by lengthy legal challenges once new projects have actually been permitted. AGA urges EPA to work with Congress to pass meaningful and durable environmental permitting reforms, which must include associated judicial reforms to ensure that natural gas and all energy infrastructure projects can deliver the reliable, affordable energy capacity our nation needs.

In the meantime, EPA can use its existing statutory authority improve the permitting morass within its own regulatory ambit, as well as by coordinating with partner agencies to improve jointly administered permitting programs—such as the U.S. Army Corps of Engineers, which is presently working on the March 2026 reauthorization of Clean Water Act Nationwide Permits. Several EPA-specific regulatory reforms of interest to AGA are listed below:

***Refine the regulatory definition of WOTUS.*** AGA members and other regulated entities continue to experience confusion about the scope and impact of how waters of the United States (“WOTUS”) is defined under the Clean Water Act. Although the Supreme Court clearly narrowed the scope of Clean Water Act jurisdiction in *Sackett v. EPA*, 598 U.S. 651 (2023), EPA has yet to properly conform its regulations to the *Sackett* holding. To help avoid further WOTUS-related regulatory whiplash, AGA encourages the incoming administration to make targeted revisions to the existing WOTUS rule to fully implement *Sackett*, rather than rescinding the prior administration’s WOTUS rulemaking and starting over from scratch. In addition, it would be helpful for EPA to work with the Army Corps to issue guidance clarifying how existing Clean Water Act regulations should be applied, as well as rescinding confusing and problematic guidance. It is imperative that EPA Regional Offices and Army Corps Districts have clear guidance on how existing regulations should be applied, and that existing regulations are applied consistently across EPA Regions and Army Corps Districts.

***Prohibit vague Clean Water Act permit conditions.*** AGA encourages EPA to prohibit vague, generic water quality conditions in Clean Water Act National Pollution Discharge Elimination System (“NPDES”) permits, such as the permit limits at issue in the recently argued case *San Francisco v. EPA*, No. 23-753 (U.S.). AGA joined a group of other industry trade associations in filing an amicus brief detailing our opposition to permit conditions that hold permittees directly liable for the quality of receiving waters rather than the quality of their own discharges to those waters.<sup>9</sup> Regulated entities have no way of knowing in advance whether their discharges comply with vague conditions of their NPDES permits because the quality of a waterbody often depends on numerous variables outside of an individual permittee’s control, such as dozens or even hundreds of other permitted and unpermitted discharges into the same waterbody. The vagueness of certain NPDES conditions also jeopardizes permittees’ security under the Clean Water Act’s

---

<sup>9</sup> See Brief of *Amici Curiae* National Mining Association, et al., Supporting Petitioner, *San Francisco v. EPA*, No. 23-753 (filed July 26, 2024), [https://www.supremecourt.gov/DocketPDF/23/23-753/320921/20240726142418631\\_23-753%20Amicus%20Brief.pdf](https://www.supremecourt.gov/DocketPDF/23/23-753/320921/20240726142418631_23-753%20Amicus%20Brief.pdf).

permit shield. EPA should end this practice of allowing impossibly vague permit conditions, regardless of whether the Supreme Court determines that it is prohibited under the Clean Water Act.

**Rein in EPA's regulatory reach under Clean Water Act Section 401.** Clean Water Act Section 401 requires that any applicant for a federal license or permit that may result in a discharge to navigable waters obtain a water quality certification from the appropriate state or tribal authority in which the discharge will originate. Section 401 certification has long been a cause of delay and uncertainty for infrastructure projects like interstate natural gas pipelines. The prior administration's September 2023 final rule revising the Section 401 regulations went beyond EPA's authority under the Clean Water Act, most notably by expanding the scope of Section 401 reviews to address the "activity as a whole," rather than focusing only on the relevant discharge to jurisdictional waters. AGA urges the incoming administration to take appropriate steps to restore the common-sense reforms advanced during the initial Trump Administration and help ensure that the Section 401 permit process cannot be used to delay the construction of critical natural gas infrastructure.

### **Return the ENERGY STAR Program to its Core Principles**

AGA supports ENERGY STAR and urges EPA to return the program to its mission of providing "simple, credible, and unbiased information" on a product's energy efficiency in a fuel-neutral manner.<sup>10</sup> Past proposals to eliminate natural gas appliances from ENERGY STAR have undercut the program's value and purpose. In administering the program, EPA should be following the ENERGY STAR Products Program Strategic Vision and Guiding Principles, which state that specifications should be designed to "treat fuel types separately, so that consumers may find the right products for the fuel type in their home, as most make product replacements without switching fuel types" and "generally take a technology neutral approach to helping consumers identify the most efficient products within the category."<sup>11</sup>

Natural gas customers look to ENERGY STAR to help them make informed decisions about efficient home appliances, not to limit the availability of their choices in the marketplace. Eliminating the ENERGY STAR label for natural gas equipment would leave consumers with less information, potentially leading them to purchase less efficient products. Furthermore, AGA members' energy efficiency programs—which have yielded substantial energy savings and avoided GHG emissions—often rely on ENERGY STAR certification when determining eligibility for utility-provided incentives like appliance rebates. AGA urges the incoming administration to evaluate all recent and pending ENERGY STAR program revisions to ensure any changes are consistent with the program's core principles. In particular, AGA asks EPA to take the following actions:

**Review the Final Version 5.0 Furnace Specifications.** On January 10, 2025, EPA issued the Final Version 5.0 ENERGY STAR Furnace Specifications with a target effective date of July 31, 2026 ("Final Version 5.0").<sup>12</sup> In Final Version 5.0, EPA proposes natural gas furnace performance requirements of 97 percent Annual Fuel Utilization Efficiency ("AFUE") for the U.S. North and 95 percent AFUE for the U.S. South. AGA supports the regional distinction for ENERGY STAR natural gas furnaces because it reflects the reality that, in general, homes in the southern half of the United States require less heat than homes in the northern half.<sup>13</sup>

---

<sup>10</sup> AGA supports EPA's continued use of "source energy," also referred to as "full fuel cycle," in its efficiency analysis. Source energy provides the most technically accurate method for determining overall energy consumption and energy savings, and it should be used by EPA and other federal agencies when assessing energy efficiency matters.

<sup>11</sup> ENERGY STAR® Products Program Strategic Vision and Guiding Principles (May 2012), [https://www.energystar.gov/sites/default/files/asset/document/ENERGY\\_STAR\\_Strategic\\_Vision\\_and\\_Guiding\\_Principles.pdf](https://www.energystar.gov/sites/default/files/asset/document/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf).

<sup>12</sup> See ENERGY STAR, Final Version 5.0 (Jan. 10, 2025), <https://www.energystar.gov/furnace-version-5-pd>.

<sup>13</sup> See AGA, Letter re: Final Version 5.0 (Dec. 19, 2024), <https://www.energystar.gov/sites/default/files/2024-12/AGA%20Comments.pdf>.

However, AGA asks EPA to revise Final Version 5.0 so the level in the U.S. South would be 92 percent AFUE effective sometime during 2026. With AFUE in the U.S. North remaining at 97 percent, the revised specification would represent a two-percentage point increase in AFUE in both regions, thus preserving significant product availability for most consumers. It also would allow for significant energy savings in the U.S. North, where the average usage is more than twice that of the U.S. South, while continuing to incentivize more efficient, cost-effective options in the U.S. South.

**Withdraw the proposal to eliminate natural gas boilers from ENERGY STAR.** On June 5, 2023, EPA proposed to eliminate efficient natural gas boilers from the ENERGY STAR program.<sup>14</sup> As discussed above, AGA strongly opposes proposals to remove natural gas products from the program. Thus, AGA urges EPA to withdraw its June 2023 proposal to sunset the ENERGY STAR Residential Boilers Specification.<sup>15</sup>

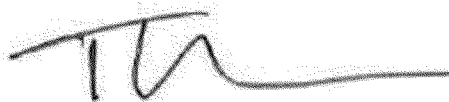
### **Improve the Transparency of Agency Actions via EPA's Website**

There is room for improvement to EPA's website, particularly with regard to the availability of documents like non-binding guidance and petitions for EPA action. EPA made some notable improvements in this area during the initial Trump Administration, particularly with the establishment of searchable databases of guidance documents, and AGA encourages EPA to expand on this progress over the next four years. Regulatory transparency is a significant issue not only for the regulated entities that currently struggle to locate all relevant pieces of the regulatory puzzle, but also for members of the public with an interest in EPA's administrative and judicial activities. For example, the Sierra Club NSPS petition discussed above is not readily available on EPA's webpage for administrative petitions to the Office of Air and Radiation, thereby hindering public participation in the administrative process for an issue of critical importance to many Americans—continued access to gas-fired heating appliances.

Thank you for your time and consideration. AGA is committed to being a resource for EPA and helping the agency develop legally durable rules that will stabilize the constant pendulum of environmental regulatory churn that upends business planning in the natural gas industry. We stand ready to work with the incoming administration to support policies that will ensure affordable and reliable energy for Americans while also protecting the environment for generations to come.

If you have any questions about this letter or would like to meet with AGA staff to discuss our environmental policy priorities, please contact Jennifer Baseman, Associate Counsel for Environment, at [jbaseman@aga.org](mailto:jbaseman@aga.org).

Sincerely,



Timothy R. Parr  
Deputy General Counsel  
American Gas Association

<sup>14</sup> See ENERGY STAR Residential Boilers Discussion Guide (June 5, 2023), [https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide%200.pdf?gl=1\\*103ldb1\\*ga\\*MTAwNjkzMjc0S4xNjcwNDI3MzMw\\*ga\\_S0KJTVVLQ6\\*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w](https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide%200.pdf?gl=1*103ldb1*ga*MTAwNjkzMjc0S4xNjcwNDI3MzMw*ga_S0KJTVVLQ6*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w).

<sup>15</sup> See AGA, Letter re: Removal of Natural Gas Boilers from the ENERGY STAR Program (July 7, 2023), <https://www.energystar.gov/sites/default/files/asset/document/AGA%20Comments.pdf>.

American Gas Association  
400 North Capitol St., NW #450  
Washington, DC 20001

January 16, 2025

**To: President-elect Donald J. Trump  
Members of the Incoming Administration  
Members of the 119<sup>th</sup> United States Congress**

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of natural gas to more than 189 million Americans and 5.8 million businesses in all 50 states. Natural gas has been and will continue to be the cornerstone of America's economy and America's energy independence. Our natural gas industry is committed to investing, building and innovating for the families and businesses who depend on us every minute of every day. Natural gas utilities and our employees have delivered on the promise of America, and we are not done yet.

We look forward to working with the incoming administration and the 119<sup>th</sup> United States Congress to leverage our nation's abundant energy to build upon America's competitiveness. Our nation is breaking all previous records for increased natural gas demand, adding one new customer every minute of every day. In fact, during Winter Storm Heather (January, 2024), natural gas accounted for 62% of all energy delivered and set a new record. The current cold weather across the country will likely set yet another new record. Additionally, with expected growth in advanced manufacturing, artificial intelligence (AI) and liquefied natural gas (LNG) exports, demand will continue to increase. We must build modern pipeline infrastructure to deliver energy where it is needed and enable the economy of the future.

America has the best entrepreneurs and innovators on the planet, and their hard work has unlocked our abundant natural resources. Our members are proud of the contributions they have made to our country and are committed to delivering the most efficient natural gas and new advanced technologies, such as renewable natural gas and hydrogen, to meet our nation's and the world's energy needs.

Outlined below are five important steps that we stand ready to collaborate on to fully realize America's energy potential. These steps will have an immediate impact on bringing more affordable, reliable energy to all Americans, driving the economy and jobs of the future, advancing our national security and leading on innovation.

**Economic Competitiveness.** Affordable and reliable natural gas is the underpinning of the United States' economy. If we are serious about building the economy of the future, we need more energy, and we need a robust energy portfolio to ensure access to affordable and reliable energy for Americans. A strategic investment in America's energy future will:

- Unleash the power of AI, data centers and advanced manufacturing.
- Keep hospitals open and schools warm and bright.
- Empower hotels to support tourism and restaurants to prepare food.
- Sustain pharmaceutical companies as they manufacture life-saving drugs.
- Allow farmers to rely on American fertilizer to grow our food and meat processors to deliver fresh meat and chicken to grocery stores.

Recognizing the power of innovation and removing restrictions on advanced fuels will ensure our energy revolution continues far into the future. The economy of today and tomorrow depends on natural gas.

**Affordability and Consumer Choice.** The natural gas industry has a proven track record of working to help solve our nation's most complex challenges and advancing common sense solutions for all Americans. Our nation's abundant supplies of natural gas continue to provide Americans with the affordable and reliable energy they rely on. The average family that uses natural gas in their home saves \$1,132 on their utilities bills every year – money they can choose to spend on their family's priorities, whether that is education, rent or anything else.

We must advance policies that safeguard consumer choice in America's homes and businesses as well as the economic benefits that choice provides for consumers and communities across the country. Efforts to ban natural gas appliances have been soundly rejected by the American people and need to be overturned. Further, attempts to ban natural gas through state regulations or building codes are misguided at best. Fuel choice is clearly an important issue for American consumers: 26 states have already passed fuel choice legislation. Federal legislative or executive action is needed to further protect natural gas, a vital source of energy that is three times more affordable than electricity to heat our citizens' homes.

**Safety and Security.** Natural gas is an integral part of our nation's energy system, delivered through a 2.8-million-mile underground pipeline system. In order to continue to advance safety and security across the industry we must ensure the passage of reasonable and effective pipeline safety reauthorization. Funding for pipeline modernization must be a priority for both Congress and the administration. As cyber-attacks increase on critical infrastructure, America needs cybersecurity regulations that are risk-based and outcome-driven rather than compliance-driven. Both must also embrace the use of new and advanced technologies and refrain from prescriptive measures. Additionally, as physical attacks on our system and employees are becoming more prevalent, federal action to penalize perpetrators is warranted.

**Permitting Reform.** It's no secret that it's hard to build new energy infrastructure in America. The main culprits: a byzantine permitting process that imposes unnecessary and detrimental delays and a legal system that bogs down challenges to new projects for years in court. Congress must pass meaningful and durable permitting reform to include associated judicial reform for natural gas and all energy projects to deliver the energy capacity our nation needs. This much-needed reform will drive economic progress for this country, homeowners and businesses alike, and help ensure Americans have access to the reliable energy they want, need and expect.

**National Security.** The lynchpin to our way of life is our national security. To deliver economic benefits, jobs, security and keep our global adversaries at bay, natural gas is the critical piece of the puzzle to unleash America's potential. The national security dividend of not having to import natural gas from countries that don't share our values or interests is incalculable. We must restart the LNG export permitting process to support our allies and to provide greater global stability as we secure America's homeland. Thanks to advancements in natural gas technologies, the U.S. has become the number one producer and exporter of LNG and a global leader in reducing emissions while maintaining economic growth at home and increasing energy security.

We stand ready to work with the incoming administration and the 119<sup>th</sup> United States Congress to forge a path forward that will realize America's full energy potential.

Sincerely,



**Lloyd Yates**  
President and Chief Executive Officer,  
NiSource Inc.  
Chair, American Gas Association



**Karen Harbert**  
President and Chief Executive Officer,  
American Gas Association

Message

---

**From:** Abboud, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=64EDF8A538154C89B8AFB97C7347AEED-8A26A0A2-B3]  
**Sent:** 2/13/2025 2:55:53 PM  
**To:** Golinsky Baseman, Jennifer [jbaseman@aga.org]  
**CC:** Farrell, Carolyn [CFarrell@aga.org]; Lauman, Lauren [Lauman.Lauren@epa.gov]  
**Subject:** RE: AGA meeting request  
**Attachments:** EPA Meeting Information Form.docx; EPA Event Information Form.docx

Hey Jen, great talking also cc'ing Lauren from my team. I attached the forms to fill out for the event and meeting requests. Would love to get more details about the expo in May if that is a possibility.

---

**From:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Sent:** Wednesday, February 12, 2025 4:30 PM  
**To:** Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** Farrell, Carolyn <CFarrell@aga.org>  
**Subject:** AGA meeting request

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I just left you a voicemail but wanted to follow up by email as well. AGA's President and CEO, [Karen Harbert](#), is hoping to schedule a meeting with the Administrator to discuss AGA's environmental priorities and how our trade association can be helpful to EPA. AGA Board Chair [Lloyd Yates](#) of NiSource may wish to participate in the meeting as well, depending on his schedule.

In case you have not seen them yet, I am attaching AGA's January 16 letter to the EPA Transition Team and AGA's broader letter to the Administration and 119<sup>th</sup> Congress regarding our organization's priorities. I anticipate that Karen and Lloyd will want to discuss these issues with Administrator Zeldin in their meeting.

I am copying Carolyn Farrell, Manager of the AGA President's Office, to help with meeting scheduling. Please let me know if there is any additional information I can provide that would be helpful.

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

### Basic Background

Event official title:	
Event host(s)/organizer(s):	<i>List all hosts organizing the event. Note if this is an EPA hosted or co-hosted event.</i>
Event date (flexible?):	
Time, duration, and time zone of event:	<i>E.g., 12:00pm through 3:00pmEST</i>
<b>Deadline for acceptance:</b>	
Will you accept a surrogate?	
Event location and physical address:	<i>E.g., ABC Convention Center, 123 Boulevard Way, Baltimore, MD, 56789</i>
Type of event:	<i>Reception; Conference; Meeting; Recorded/Streaming audio or video, etc.</i>
Host(s) relationship to the EPA?	
Event sponsor(s):	

### Event Description and Role of the EPA Official

Purpose of event:	
Brochure/website/invitation/ and/or other event materials:	<i>List here or provide separately in response</i>
Run of show/agenda:	<i>Provide full agenda of event, including events immediately before/following the EPA official's participation</i>
Timing for EPA official's role:	<i>Example: 1:00pm to 1:15pmEST</i>
Role of the EPA official at the event:	<i>Attendance only? Panel presentation? Speaker? Participating in press conference? Touring a facility? Etc.</i>
Requested presentation topic (if speaking):	
Requested presentation format:	<i>Keynote, panel, Q&amp;A, introduction, fireside chat, etc.</i>
Name and title of person introducing EPA official:	
Audience make up?	<i>Size of audience and brief description. E.g., 100 expected in attendance made up of attorneys, business owners, students, industry, employees, etc.</i>
Event held weekly, monthly, annually?	



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

### Event Preparation

Other EPA speakers?	<i>Name and titles of EPA personnel</i>
Does EPA need to submit materials prior to event?	<i>Registration Form? Biography? Picture? Copy of presentation, speaker release form, etc?</i>
Expected prep and timing for prep calls or meetings:	
Registration fee charged? How much?	
Describe entity hosting EPA official:	<i>Private company; 501(c)(3); 501(c)(4); 501(c)(6); 527 Political Action Committee; academic institution; etc.</i>
Is the entity also a Federally Registered Lobbyist?	<i>Yes / No</i>
Are you giving a gift, award or anything else of value? Amount?	<i>E.g., Speaker or courtesy gift; award; plaque; travel support (hotel, transportation, etc.) etc., + description and value</i>
Are you providing a meal? Amount?	

### At the Event and Other Event Logistics

Is there a private hold room available for the Administrator?	
Open press/closed press?	
Will you be issuing a press release?	
Person to contact for media purposes:	<i>Name &amp; Title; Email; Office Number, Cell Number</i>
Dress code:	<i>Casual/Business/Black Tie Optional/Black Tie/Etc.</i>
Room setup:	<i>What kind of microphone? What is the room setup? Is there a podium?</i>
Notable/honorable guests attending (including elected officials):	
Are you recording the event? Website URL for recording (if event is recorded and posted):	
Security contact:	<i>Name &amp; Title; Email; Office Number, Cell Number</i>



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

Directions to event (include relevant information about parking, the specific building, best entrance to use)	
Where to meet contact:	

### Contact Information

Your name and position:	
Phone (best & alternate):	
Email address:	
Mailing address:	
Are you the point-of-contact at the event? If not, contact details:	

*Please return this completed form to [ [HYPERLINK "mailto:zeldinscheduling@epa.gov"](mailto:zeldinscheduling@epa.gov) ], and copy [ [HYPERLINK "mailto:brown.ashley@epa.gov"](mailto:brown.ashley@epa.gov) ]*

Message

---

**From:** Abboud, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=64EDF8A538154C89B8AFB97C7347AEED-8A26A0A2-B3]  
**Sent:** 3/5/2025 1:46:48 AM  
**To:** Golinsky Baseman, Jennifer [jbaseman@aga.org]  
**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Hey Jen, I talked with our team and we can get that lined up. Can you send in the request to this email address? Cc me as well.

[oar\\_invitations@epa.gov](mailto:oar_invitations@epa.gov)

---

**From:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Sent:** Tuesday, March 4, 2025 3:12 PM  
**To:** Abboud, Michael <abboud.michael@epa.gov>  
**Subject:** RE: [EXTERNAL] RE: AGA meeting request

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I think for a staff-level meeting it would be most efficient to focus on AGA's OAR priorities. I'm not sure which specific political staffers are assigned to those priorities (and I understand the agency is still staffing up so it might be TBD).

What would be ideal for AGA would be one meeting with both OAQPS staff and OAP staff in attendance, covering the following issues: OAQPS (Clean Air Act Sec. 111, Clean Air Act Sec. 110 state implementation plans) and OAP (GHGRP, GHG Inventory, ENERGY STAR). AGA would bring approx. 2 to 4 of our staff to this meeting.

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**  
American Gas Association  
400 N. Capitol St., NW | Washington, DC | 20001  
P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Abboud, Michael <abboud.michael@epa.gov>  
**Sent:** Monday, March 3, 2025 10:14 PM  
**To:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Subject:** Re: [EXTERNAL] RE: AGA meeting request

Is there specific staffers you have for issue area or can I just set up the meeting and bring the various political staffers in from our end with one of your reps?

Get [Outlook for iOS](#)

---

**From:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Sent:** Monday, March 3, 2025 5:21:39 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Subject:** RE: [EXTERNAL] RE: AGA meeting request

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

Following up on your call this morning: I checked with my AGA colleagues and, as expected, our organization has not had any staff-level meetings with EPA since President Trump took office. We are happy to schedule a staff-level meeting in advance of Administrator Zeldin meeting with AGA's Karen Harbert if that is the Administrator's preference.

For your reference, AGA's top priorities at EPA are largely covered by the following program offices:

- Office of Air and Radiation – particularly OAQPS (Clean Air Act Sec. 111, state implementation plans) and OAP (GHGRP, GHG Inventory, ENERGY STAR, MERP), as well as ORIA (indoor air quality)
- Office of Water – particularly Clean Water Act permitting via OWM and OWOW
- Office of Land and Emergency Management – particularly OEM (RMP)

Please let me know if there is any further information I can provide.

Thank you!

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Golinsky Baseman, Jennifer

**Sent:** Thursday, February 27, 2025 2:14 PM

**To:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>; Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; [zeldinscheduling@epa.gov](mailto:zeldinscheduling@epa.gov)

**Cc:** Parr, Tim <[TParr@aga.org](mailto:TParr@aga.org)>; [brown.ashley@epa.gov](mailto:brown.ashley@epa.gov)

**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Michael, Lauren –

Attached please find AGA's event information form inviting Administrator Zeldin to AGA's Exhibition and Operations Conference on Tuesday, May 6, 2025 in Aurora, Colorado. Please let us know if you need any additional information or have any questions.

Thank you for considering our invitation!

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001  
P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Golinsky Baseman, Jennifer  
**Sent:** Tuesday, February 25, 2025 2:21 PM  
**To:** 'Lauman, Lauren' <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>; 'Abboud, Michael' <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; 'zeldinscheduling@epa.gov' <[zeldinscheduling@epa.gov](mailto:zeldinscheduling@epa.gov)>  
**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>; 'brown.ashley@epa.gov' <[brown.ashley@epa.gov](mailto:brown.ashley@epa.gov)>  
**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Michael, Lauren –

Attached please find AGA's meeting request form, along with two AGA letters referenced in the form (re: proposed meeting topics and briefing materials). Please do not hesitate to let me know if you need additional information.

We are ironing out some final details for our event request form for AGA's May Exhibition and Operations Conference and hope to have that over to you very soon.

Thank you!

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001  
P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>  
**Sent:** Thursday, February 13, 2025 3:41 PM  
**To:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>; Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>  
**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>  
**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Thanks Lauren! We'll get our ducks in a row on the event and meeting request forms and send those over to you next week. In the meantime, here is a quick hit on our May 2025 Exhibition and Operations Conference ([available here](#) and shown below):

**2025 AGA Operations Conference & Biennial Exhibition & Spring Committee Meetings**

**May 5, 2025 – May 8, 2025**

Aurora, CO

The annual AGA Operations Conference is the natural gas industry's premier gathering of natural gas utility and transmission company operations management from across North America and the world for the sharing of technical knowledge, ideas, and practices to promote the safe, reliable, and cost-effective delivery of natural gas to the end-user. The Operations Conference is AGA's largest forum with regularly more than 900 operations management in attendance, including 100 speakers, and over 120 technical presentations that run the gamut of topics, such as gas measurement, operations advocacy, safety, environment, storage, engineering, construction and maintenance, gas control, supplemental gas, corrosion control and piping materials.

## Spring Committee Meetings

AGA's Operations Technical Committee's will be meeting May 5-6, in conjunction with the Operations Conference.

## 2025 Exhibition

The 2025 exhibition will be held in conjunction with the conference. The exhibition attracts approximately 250 domestic/international vendors occupying 50,000+ square feet of Exhibit Space, including large islands.

## Jennifer Golinsky Baseman | Senior Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Sent:** Thursday, February 13, 2025 12:07 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** [EXTERNAL] RE: AGA meeting request

You don't often get email from [lauman.lauren@epa.gov](mailto:lauman.lauren@epa.gov). [Learn why this is important](#)

Hi Jen and Carolyn!

Great to meet you both, look forward to hearing about the expo and speaking with you both in the future! Please let me know if you need anything else.

Thank you,  
Lauren

---

**From:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Sent:** Thursday, February 13, 2025 9:56 AM

**To:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>; Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Subject:** RE: AGA meeting request

Hey Jen, great talking also cc'ing Lauren from my team. I attached the forms to fill out for the event and meeting requests. Would love to get more details about the expo in May if that is a possibility.

---

**From:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Sent:** Wednesday, February 12, 2025 4:30 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** AGA meeting request

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I just left you a voicemail but wanted to follow up by email as well. AGA's President and CEO, [Karen Harbert](#), is hoping to schedule a meeting with the Administrator to discuss AGA's environmental priorities and how our trade association can be helpful to EPA. AGA Board Chair [Lloyd Yates](#) of NiSource may wish to participate in the meeting as well, depending on his schedule.

In case you have not seen them yet, I am attaching AGA's January 16 letter to the EPA Transition Team and AGA's broader letter to the Administration and 119<sup>th</sup> Congress regarding our organization's priorities. I anticipate that Karen and Lloyd will want to discuss these issues with Administrator Zeldin in their meeting.

I am copying Carolyn Farrell, Manager of the AGA President's Office, to help with meeting scheduling. Please let me know if there is any additional information I can provide that would be helpful.

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

Message

**From:** (Butler) Eddowes, Elizabeth [EEddowes@aga.org]  
**Sent:** 2/19/2025 4:52:34 PM  
**To:** Abboud, Michael [abboud.michael@epa.gov];  
Weiner, Ben [Weiner.Ben@epa.gov]  
**CC:** Lauman, Lauren [Lauman.Lauren@epa.gov];  
Golinsky Baseman, Jennifer [JBaseman@aga.org]  
**Subject:** RE: [EXTERNAL] RE: Meeting Request on behalf of Karen Harbert, President & CEO of American Gas Association

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Michael,

We appreciate your swift response and I've been tracking down more info on my end so thanks for your patience.

Our team has decided it would be best if we just consolidated our requests. I've spoken with Jen Baseman in our office who will be running point on returning this form to you with all the information you need. Ccing Jen for awareness.

Thank you everyone for your help with our request, and we look forward to working with you! Have a great rest of the week.

Regards,  
Liz Eddowes

**Elizabeth (Butler) Eddowes | Manager, PAC and Programs**  
American Gas Association

400 N Capitol St., NW, Suite 450 | Washington, DC | 20001

P: 202-824-7231 | M: 216-577-6700 | [eeddowes@aga.org](mailto:eeddowes@aga.org)

*For more information about GASPAC go to [www.AGAGASPAC.org](http://www.AGAGASPAC.org)*

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>  
**Sent:** Friday, February 14, 2025 11:07 AM  
**To:** (Butler) Eddowes, Elizabeth <[EEddowes@aga.org](mailto:EEddowes@aga.org)>; Weiner, Ben <[Weiner.Ben@epa.gov](mailto:Weiner.Ben@epa.gov)>  
**Cc:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>  
**Subject:** RE: [EXTERNAL] RE: Meeting Request on behalf of Karen Harbert, President & CEO of American Gas Association

Hey Liz, thanks for reaching out. We have a request in from Jen on your team for a general meeting with the Administrator. Can I have you fill out this form and we will work on setting up a meeting?

---

**From:** (Butler) Eddowes, Elizabeth <[EEddowes@aga.org](mailto:EEddowes@aga.org)>  
**Sent:** Friday, February 14, 2025 9:35 AM  
**To:** Weiner, Ben <[Weiner.Ben@epa.gov](mailto:Weiner.Ben@epa.gov)>

Cc: Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

Subject: RE: [EXTERNAL] RE: Meeting Request on behalf of Karen Harbert, President & CEO of American Gas Association

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you, Ben!

Mike, thanks in advance for your help. Please do not hesitate to let me know if you need any additional information in order to process this request.

Thank you both,  
Liz

**Elizabeth (Butler) Eddowes | PAC and Political Programs**

American Gas Association

400 N Capitol St., NW, Suite 450 | Washington, DC | 20001

P: 202-824-7231 | M: 216-577-6700 | [eeddowes@aga.org](mailto:eeddowes@aga.org)

For more information about GASPAC go to [www.AGAGASPAC.org](http://www.AGAGASPAC.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Weiner, Ben <[Weiner.Ben@epa.gov](mailto:Weiner.Ben@epa.gov)>

**Sent:** Friday, February 14, 2025 9:33 AM

**To:** (Butler) Eddowes, Elizabeth <[EEddowes@aga.org](mailto:EEddowes@aga.org)>

**Cc:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Subject:** [EXTERNAL] RE: Meeting Request on behalf of Karen Harbert, President & CEO of American Gas Association

Hey Liz,

Thanks for reaching out! Looping in Mike from OPEEE, who should be able to assist with this.

Best,  
Ben

**Ben Weiner**

Special Advisor for Communications | Office of Public Affairs

U.S. Environmental Protection Agency

---

**From:** (Butler) Eddowes, Elizabeth <[EEddowes@aga.org](mailto:EEddowes@aga.org)>

**Sent:** Friday, February 14, 2025 9:29 AM

**To:** Weiner, Ben <[Weiner.Ben@epa.gov](mailto:Weiner.Ben@epa.gov)>

**Subject:** Meeting Request on behalf of Karen Harbert, President & CEO of American Gas Association

**Importance:** High

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Morning Ben,

I hope you are well!

On behalf of our President and CEO, Karen Harbert, I'd like to submit a meeting request to Administrator Zeldin for this month.

Karen Harbert will be hosting our AGA Board Chairman, Lloyd Yates (of NiSource) in Washington, DC on February 20<sup>th</sup> and 25<sup>th</sup> and would appreciate any opportunity to come by, introduce themselves and have a chance to discuss critical energy priorities with the new Administration.

I've attached our formal request to meet. Please let me know if you have any questions and can help me get our request to the Administrator's scheduling team for consideration.

Thank you advance for your help,  
Liz Eddowes

**Elizabeth (Butler) Eddowes | PAC and Political Programs**

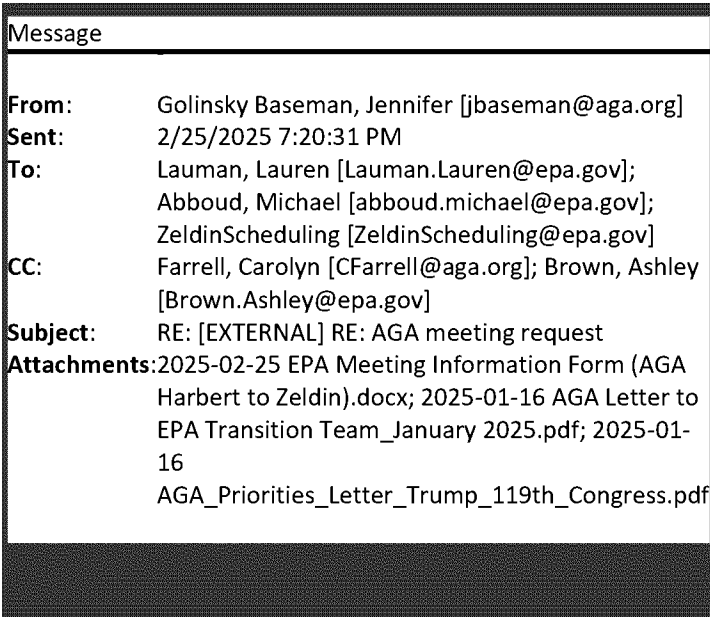
American Gas Association

400 N Capitol St., NW, Suite 450 | Washington, DC | 20001

P: 202-824-7231 | M: 216-577-6700 | [eedowes@aga.org](mailto:eedowes@aga.org)

*For more information about GASPAC go to [www.AGAGASPAC.org](http://www.AGAGASPAC.org)*

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Michael, Lauren –

Attached please find AGA’s meeting request form, along with two AGA letters referenced in the form (re: proposed meeting topics and briefing materials). Please do not hesitate to let me know if you need additional information.

We are ironing out some final details for our event request form for AGA’s May Exhibition and Operations Conference and hope to have that over to you very soon.

Thank you!

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**  
American Gas Association  
400 N. Capitol St., NW | Washington, DC | 20001  
P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Golinsky Baseman, Jennifer <jbaseman@aga.org>  
**Sent:** Thursday, February 13, 2025 3:41 PM  
**To:** Lauman, Lauren <Lauman.Lauren@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>  
**Cc:** Farrell, Carolyn <CFarrell@aga.org>  
**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Thanks Lauren! We’ll get our ducks in a row on the event and meeting request forms and send those over to you next week. In the meantime, here is a quick hit on our May 2025 Exhibition and Operations Conference ([available here](#) and shown below):

**2025 AGA Operations Conference & Biennial Exhibition & Spring Committee Meetings**  
**May 5, 2025 – May 8, 2025**  
Aurora, CO

The annual AGA Operations Conference is the natural gas industry’s premier gathering of natural gas utility and transmission company operations management from across North America and the world for the sharing of technical

knowledge, ideas, and practices to promote the safe, reliable, and cost-effective delivery of natural gas to the end-user. The Operations Conference is AGA's largest forum with regularly more than 900 operations management in attendance, including 100 speakers, and over 120 technical presentations that run the gamut of topics, such as gas measurement, operations advocacy, safety, environment, storage, engineering, construction and maintenance, gas control, supplemental gas, corrosion control and piping materials.

### Spring Committee Meetings

AGA's Operations Technical Committee's will be meeting May 5-6, in conjunction with the Operations Conference.

### 2025 Exhibition

The 2025 exhibition will be held in conjunction with the conference. The exhibition attracts approximately 250 domestic/international vendors occupying 50,000+ square feet of Exhibit Space, including large islands.

### Jennifer Golinsky Baseman | Senior Counsel, Environment

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Sent:** Thursday, February 13, 2025 12:07 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** [EXTERNAL] RE: AGA meeting request

You don't often get email from [lauman.lauren@epa.gov](mailto:lauman.lauren@epa.gov). [Learn why this is important](#)

Hi Jen and Carolyn!

Great to meet you both, look forward to hearing about the expo and speaking with you both in the future! Please let me know if you need anything else.

Thank you,  
Lauren

---

**From:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Sent:** Thursday, February 13, 2025 9:56 AM

**To:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>; Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Subject:** RE: AGA meeting request

Hey Jen, great talking also cc'ing Lauren from my team. I attached the forms to fill out for the event and meeting requests. Would love to get more details about the expo in May if that is a possibility.

---


**From:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Sent:** Wednesday, February 12, 2025 4:30 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** AGA meeting request



**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I just left you a voicemail but wanted to follow up by email as well. AGA's President and CEO, [Karen Harbert](#), is hoping to schedule a meeting with the Administrator to discuss AGA's environmental priorities and how our trade association can be helpful to EPA. AGA Board Chair [Lloyd Yates](#) of NiSource may wish to participate in the meeting as well, depending on his schedule.

In case you have not seen them yet, I am attaching AGA's January 16 letter to the EPA Transition Team and AGA's broader letter to the Administration and 119<sup>th</sup> Congress regarding our organization's priorities. I anticipate that Karen and Lloyd will want to discuss these issues with Administrator Zeldin in their meeting.

I am copying Carolyn Farrell, Manager of the AGA President's Office, to help with meeting scheduling. Please let me know if there is any additional information I can provide that would be helpful.

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



## EPA ADMINISTRATOR MEETING INFORMATION FORM

*This form assists in planning participation in meetings. Please be complete to minimize need for follow up. This is not a meeting confirmation.*

### Meeting Logistics

*(Please identify the person(s) (name and affiliation) requesting the meeting, including any background information on the affiliated organization(s).) Note if this is an EPA hosted or co-hosted event.*

**Karen Harbert, President and CEO of the American Gas Association** ([ [HYPERLINK "https://www.aga.org/people/karen-harbert/"](https://www.aga.org/people/karen-harbert/) ] )

**Lloyd Yates, President and Chief Executive Officer of NiSource Inc. and Chair of the American Gas Association Board of Directors** ([ [HYPERLINK "https://www.nisource.com/company/leadership/lloyd-yates"](https://www.nisource.com/company/leadership/lloyd-yates) ] )

Requesting individual/organization:

**The American Gas Association (AGA), founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the country. There are more than 79 million residential, commercial, and industrial natural gas customers in the United States, of which 94 percent—more than 74 million customers—receive their gas from AGA members. AGA develops and advocates for informed, innovative, and durable policy that fulfills our nation’s energy needs, environmental aspirations, and economic potential. Additionally, AGA provides state-of-the-art solutions for our member companies to safely and securely deliver reliable and affordable natural gas and advanced fuels to homes and businesses across the nation. Additional information is available at [ [HYPERLINK "https://www.aga.org"](https://www.aga.org) ].**

**AGA is requesting this executive-level meeting with Administrator Zeldin at either EPA Headquarters or AGA’s Washington, DC office. If held at EPA HQ, it would be an EPA-hosted meeting.**

Contact information:

*Name, Email, Phone, Title*

**Jennifer Baseman, [ [HYPERLINK "mailto:jbaseman@aga.org"](mailto:jbaseman@aga.org) ], 202-824-7340, Senior Counsel for Environment – AGA**

**Carolyn Farrell, [ [HYPERLINK "mailto:cfarrell@aga.org"](mailto:cfarrell@aga.org) ], 202-824-7339, Manager, President’s Office – AGA**

Title of the meeting:

*The topic for discussion should be listed in the title of the meeting.*

**Introductory meeting and policy priority discussion with American Gas Association leadership**



## EPA ADMINISTRATOR MEETING INFORMATION FORM

*This form assists in planning participation in meetings. Please be complete to minimize need for follow up. This is not a meeting confirmation.*

Describe the proposed meeting topic/ agenda, provide available briefing materials:	<b>Attached are two letters outlining topics for potential discussion during the meeting: (1) AGA's January 16, 2025 letter to the Trump EPA Transition Team regarding Agency-specific policy priorities; and (2) AGA's January 16, 2025 letter to President Trump, the Administration, and the 119th Congress regarding whole-of-government priorities.</b>
Describe the action sought from the meeting and/or identify desired outcome(s):	<b>To convey to Administrator Zeldin that AGA stands ready and eager to work with him and his agency to advance our shared environmental and energy priorities in support of the natural gas distribution industry.</b>
Proposed meeting date and time (if date is flexible please indicate the range):	<b>Ms. Harbert is available to meet during the following date ranges (inclusive):</b> <ul style="list-style-type: none"><li>• March 3 – 7</li><li>• March 13 – 14</li><li>• March 17 – 18</li><li>• March 24</li><li>• March 28</li><li>• March 31 – April 1</li><li>• April 3</li><li>• April 14 – 18</li><li>• April 22 – 23</li><li>• April 25</li><li>• April 28 – 29</li><li>• May 1 – 2</li><li>• May 13 – 14</li><li>• May 22</li><li>• May 27 – 30</li></ul> <p><b>We are happy to provide additional, later available date ranges upon request. We would like to schedule this meeting around Mr. Zeldin and Ms. Harbert's schedules, and Mr. Yates will attend if he is available on the scheduled date.</b></p>
Requested length of time:	<b>45 to 60 minutes</b>
Please explain any time sensitivity that impacts the date of the meeting, such as court-ordered or statutory deadline:	<b>N/A</b>
Proposed meeting location:	<i>Virtual? EPA building? Other location (city, state)?</i> <b>EPA Headquarters in Washington, DC.</b>
If the Administrator is unable to meet, is a surrogate desired? If yes, who specifically?	<b>We hope to schedule a meeting with Administrator Zeldin.</b>



## EPA ADMINISTRATOR MEETING INFORMATION FORM

*This form assists in planning participation in meetings. Please be complete to minimize need for follow up. This is not a meeting confirmation.*

Are you planning to issue a press-statement on this meeting?	<b>We do not plan to issue a press statement on this meeting.</b>
Will you be requesting photography from the meeting?	<b>AGA will defer to EPA on whether photography is appropriate for this meeting. If EPA chooses to take photographs, AGA would appreciate receiving a copy of those photos.</b>

### Meeting Participants

*(-Name, organizational affiliation, email address. Please use the format in the table below)*

	<i>-Name, organizational affiliation</i>	<i>Email with “;” at the end</i>
	<i>-Cherry Blossom, AO</i>	<i>Blossom.Cherry@epa.gov;</i>
Expected meeting participants:	<b>Karen Harbert, American Gas Association</b>	[ HYPERLINK "mailto:kharbert@aga.org" ];
	<b>Lloyd Yates, NiSource Inc.</b>	[ HYPERLINK "mailto:lloyd Yates@nisource.com" ];
	<b>Jennifer Baseman, American Gas Association</b>	[ HYPERLINK "mailto:jbaseman@aga.org" ];
	<b>Carolyn Farrell, American Gas Association</b>	[ HYPERLINK "mailto:cfarrell@aga.org" ];

Are any expected meeting participants federally registered lobbyists or lobbying organizations? (If yes, please identify.)	<b>AGA is a 501(c)(6) tax-exempt organization incorporated in the State of Delaware as a non-stock, non-profit and is a federally registered lobbying organization under the Lobbying Disclosure Act. However, none of the meeting participants are federally registered lobbyists.</b>
--	---

Are any expected meeting participants a partisan political candidate, a representative of a political party or a registered political action committee (PAC)? (If yes, please identify.)	<b>No.</b>
--	------------



## EPA ADMINISTRATOR MEETING INFORMATION FORM

*This form assists in planning participation in meetings. Please be complete to minimize need for follow up. This is not a meeting confirmation.*

Do any expected meeting participants seek or currently have any business interests with the Agency such as permits, contracts, litigation, grants, etc.? (If yes, please identify.)	<b>AGA does not have any such business interests before the Agency.</b>
---	---

### Background for the Meeting

Will the meeting involve legislation, broad policy options, or other general matters that involve a large and diverse range of persons and interests? (If yes, please describe.)	<b>Yes. The meeting will address matters of importance to natural gas local distribution companies, the natural gas industry at large, and natural gas customers (<i>i.e.</i>, more than 189 million Americans and 5.8 million businesses).</b>
Will the meeting involve regulations, rules, or other matters that impact a specific industry, sector of the economy, or group of persons? (If yes, please describe.)	<b>Yes, see above.</b>
Will the meeting involve a litigation matter, a permit, a grant, a contract, or any other matter that involves specific parties? (If yes, please identify the matter and list the specific parties.)	<b>No.</b>
Any additional notes or information?	<b>We are happy to provide any additional required information upon request.</b>

### Technology for Virtual Meetings

Preferred Virtual Meeting Platform?	<b>We would prefer an in-person meeting.</b>
Do you use Microsoft Teams?	<b>Yes. We can also use other platforms as needed.</b>
Disclaimer for recording the meeting.	<b>We would prefer to not record this meeting but will work with the Agency on the particulars if the meeting is to be recorded.</b>



## **EPA ADMINISTRATOR MEETING INFORMATION FORM**

*This form assists in planning participation in meetings. Please be complete to minimize need for follow up. This is not a meeting confirmation.*

*Please return this completed form to [ [HYPERLINK "mailto:zeldinscheduling@epa.gov"](mailto:zeldinscheduling@epa.gov) ], and copy [ [HYPERLINK "mailto:brown.ashley@epa.gov"](mailto:brown.ashley@epa.gov) ]*

---



January 16, 2025

Mr. Adam Gustafson

Mr. Joel Brubaker

Ms. Nicole Dooley

Dear Members of the U.S. Environmental Protection Agency Transition Team:

Thank you for the opportunity to share the American Gas Association's ("AGA") priorities regarding the U.S. Environmental Protection Agency. AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more 189 million Americans and 5.8 million businesses in all fifty states. There are more than 79 million residential, commercial, and industrial natural gas customers in the United States, of which 94 percent—more than 74 million customers—receive their gas from AGA members. Today, natural gas meets more than one third of energy needs within the United States.

AGA members are subject to regulation under a number of EPA statutes—primarily the Clean Air Act and Clean Water Act. As a result, AGA's top-priority policy recommendations for EPA largely focus on those two statutes and related actions. We look forward to working closely with the incoming administration on these and other environmental regulatory issues of importance to AGA members and the natural gas industry as a whole.

### **Shut Down Improper Efforts to Use the Clean Air Act to Ban Natural Gas**

Over the past several years, attempts to use the Clean Air Act to enact federal natural gas bans have been on the rise. AGA urges EPA to take decisive and legally durable actions to deny these requests and send a clear signal that natural gas end uses cannot be banned under the Clean Air Act. In particular, AGA recommends that EPA take the following actions:

***Deny Sierra Club rulemaking petition for heating appliance NSPS.*** In August 2022, the Sierra Club and 25 other groups petitioned EPA to list heating appliances as a source category under Section 111(b)(1)(A) of the Clean Air Act and to issue New Source Performance Standards ("NSPS") for that source category under Section 111(b)(1)(B).<sup>1</sup> As detailed in AGA's September 2022 response to the petition,<sup>2</sup> the suggested "heating appliances" category does not qualify as a source category under Section 111, and even if it did, the petition fails to demonstrate that emissions from the "category" endanger public health and welfare. Further, the NSPS requested by the petition would be unlawful for several reasons, including that it would violate the Energy Policy Conservation Act ("EPCA") and would require the kind of generation-shifting activity expressly prohibited under Section 111 by *West Virginia v. EPA*, 142 S.Ct. 2587 (2022). To date, the petition is still pending action by EPA. AGA urges EPA to deny the petition for the reasons set out in AGA's September 2022 response.

***Deny California's request to incorporate the Bay Area's gas appliance ban into its SIP.*** In November 2024, EPA proposed to approve the Bay Area Air Quality Management District gas-fired furnace and water heater ban into California's state implementation plan ("SIP"), which would make the ban federally enforceable

<sup>1</sup> [www.sierraclub.org/sites/default/files/Sierra%20Club%20Heating%20Appliance%20Rulemaking%20Petition.pdf](http://www.sierraclub.org/sites/default/files/Sierra%20Club%20Heating%20Appliance%20Rulemaking%20Petition.pdf).

<sup>2</sup> <https://www.aga.org/wp-content/uploads/2022/12/final-cover-letter-and-aga-response-SIERRA.pdf>.

under the Clean Air Act within the Bay Area.<sup>3</sup> EPA should deny this SIP revision request because the agency may not approve a SIP revision that incorporates unlawful state measures, and the measures in question are preempted by EPCA. Disapproving this SIP revision would set an important precedent that EPA will not approve these kinds of actions, several of which are under development in other jurisdictions in California and around the country. AGA plans to submit detailed comments in opposition to the proposed rule and providing a legal basis for EPA to disapprove of the requested SIP revision.

### **Preserve and Improve Programs Providing GHG Data and Analysis**

For years, EPA has compiled and published greenhouse gas (“GHG”) emissions data and analysis that AGA and its members rely on to demonstrate the incredible progress our industry has made in voluntarily reducing methane emissions. Having the GHG Reporting Program (“GHGRP”) and the Inventory of U.S. GHG Emissions and Sinks (“GHG Inventory”) available as centralized, commonly accepted sources of GHG data allows AGA to proudly and unequivocally demonstrate that U.S. natural gas distribution systems have reduced methane emissions by 70 percent from 1990 to 2022, bringing the distribution segment’s methane emissions down to 0.12 percent of throughput, all while the segment has grown in size.<sup>4</sup> Natural gas companies depend on this data to provide information regularly sought by investors, customers, and other stakeholders—including via AGA’s Natural Gas Sustainability Initiative (“NGSI”) Methane Emissions Intensity Protocol,<sup>5</sup> a voluntary methane intensity reporting tool that relies heavily on GHGRP and GHG Inventory data and methodologies. AGA encourages EPA to maintain these information repositories and make key improvements described below:

***Expand the use of facility-specific emission factors and advanced measurement technologies in the GHGRP.*** The May 2024 revision to Subpart W of the GHGRP was a positive first step toward allowing a greater use of empirical data in GHGRP reporting.<sup>6</sup> In future revisions to the program, EPA should allow for increased use of facility- and company-derived emission factors and advanced methane measurement technologies in Subpart W. AGA’s reasoning for these recommendations was shared with the agency in November 2024 comments on EPA’s request for information regarding methane quantification methodologies for Subpart W and the GHGRP at large.<sup>7</sup>

***Address the methodological uncertainties in the GHG Inventory estimates for post-meter GHG emissions.*** AGA has identified several significant data gaps and uncertainties in how EPA estimates post-meter emissions (*i.e.*, emissions from residential and commercial appliances, industrial facilities and power plants, and natural gas-fueled vehicles) in the GHG Inventory.<sup>8</sup> Having accurate post-meter emissions data

---

<sup>3</sup> Air Plan Conditional Approval; California; Bay Area Air Quality Management District, 89 Fed. Reg. 94,633 (Nov. 29, 2024), <https://www.govinfo.gov/content/pkg/FR-2024-11-29/pdf/2024-27518.pdf>.

<sup>4</sup> According to EPA’s 2024 GHG Inventory, there were 1,352,384 miles of natural gas distribution mains in 2022—an increase of 480,227 miles (55 percent) since 1990.

<sup>5</sup> For more information about NGSI, please visit <https://www.aga.org/research-policy/natural-gas-esg-sustainability/natural-gas-sustainability-initiative-ngsi>.

<sup>6</sup> Greenhouse Gas Reporting Rule: Revisions and Confidentiality Determinations for Petroleum and Natural Gas Systems, 89 Fed. Reg. 42,062 (May 14, 2024), <https://www.govinfo.gov/content/pkg/FR-2024-05-14/pdf/2024-08988.pdf>.

<sup>7</sup> AGA and American Public Gas Association Comments on August 2024 GHGRP Subpart W RFI (Nov. 27, 2024), <https://www.regulations.gov/comment/EPA-HQ-OAR-2024-0350-0062>.

<sup>8</sup> In brief, these data gaps and uncertainties include (1) a lack of consensus standard test methods and practices for measuring emissions from end-use gas appliances, (2) the use of a limited set of studies conducted on a small sample of homes as a basis for a national emissions estimate, (3) data gaps, uncertainties, and notable differences between the available studies, (4) insufficient reproducibility of methods or attention to key variables like seasonal

is essential to informing the public about the important role and benefits of natural gas in reducing GHG emissions and avoiding misconceptions based on inaccurate, misinterpreted, or misused data. AGA urges EPA to address these gaps and uncertainties in future versions of the GHG Inventory and to use the improved methodology to revise post-meter emissions data from prior years' annual GHG Inventory reports.

### **Maintain and Clarify Existing Clean Air Act Program Exemptions for the Natural Gas Distribution Segment**

We anticipate that EPA will take action to modify several key air rules during the incoming administration, including those listed below. As EPA works to improve those regulatory programs, AGA requests that the agency take care to preserve the following existing exemptions that apply to the natural gas distribution segment:

***Exclude LDC operations from the Oil and Gas NSPS / Existing Source Emission Guidelines.*** The March 2024 final rule amending the methane NSPS for new, reconstructed, and modified sources in the Oil and Natural Gas Source Category (40 C.F.R. Part 60, Subparts OOOOa and OOOOb) and establishing methane emission guidelines for existing sources in the source category (Subpart OOOOc) maintained the longstanding exclusion of “[f]acilities located inside and including the Local Distribution Company (LDC) custody transfer station.” AGA urges EPA to maintain this exclusion and the accompanying clarifying regulatory language regarding affected facilities.

***Exclude LDC operations from the Good Neighbor Rule.*** The June 2023 federal implementation plan (“FIP”) addressing several states’ outstanding interstate transport obligations under the 2015 8-hour ozone national ambient air quality standards (*i.e.*, the Good Neighbor Rule) purported to exclude reciprocating internal combustion engines (“RICE”) located inside or downstream of an LDC custody transfer station—according to EPA’s Response to Comments (“RTC”) document for this rulemaking. However, the regulatory text of the FIP was insufficiently clear on this point and left too much room for misinterpreting the FIP to apply to the RICE used by some LDCs to transport natural gas through intrastate pipelines. In future rulemakings addressing the Good Neighbor Rule, EPA should clarify that RICE used for natural gas distribution are not subject to this FIP.

***Exclude PHMSA-regulated facilities and equipment from RMP requirements.*** EPA last revised the Risk Management Program (“RMP”) regulations under Section 112(r) of the Clean Air Act in March 2024. In so doing, EPA maintained the longstanding RMP exclusion for facilities and equipment used in transportation and storage incident to transportation that are subject to the Pipeline Safety and Hazardous Materials Safety Administration (“PHMSA”) regulations at 49 C.F.R. Parts 192, 193, or 195 (or are subject to a state natural gas or hazardous liquid program that is certified by PHMSA under 49 U.S.C. § 60105). AGA urges EPA to maintain this exclusion in any future revisions to the RMP regulations.

### **Assert and Maintain EPA’s Primacy in Regulating GHG Emissions**

During the Biden Administration, a number of federal agencies other than EPA attempted to enter the realm of regulating GHG emissions. For example, in its Gas Pipeline Leak Detection and Repair rulemaking, PHMSA proposed to regulate methane leak emissions from natural gas distribution and transmission pipelines, underground natural gas storage facilities, and liquefied natural gas (“LNG”) facilities in a manner

---

temperature and weather changes, and (5) inattention to the phase-out of pilot lights from many natural gas applications over the past few decades. AGA provided detailed comments to EPA on these issues in March 2022. See AGA Comments on the Public Review Draft 2022 Inventory of U.S. Greenhouse Gas (GHG) Emissions and Sinks (1990-2020) (Mar. 17, 2022), <https://www.regulations.gov/comment/EPA-HQ-OAR-2022-0001-0023>.

that would exceed PHMSA’s authority as a safety regulator and, in some instances, would duplicate or potentially conflict with EPA’s own methane regulations. EPA is the lead federal environmental regulator and should be working with other agencies to ensure that they do not undermine or usurp EPA’s authority as the primary federal regulator of GHG emissions—particularly to ensure that regulated entities in the natural gas industry and other sectors of the economy are not subject to duplicative or conflicting requirements.

### **Take Regulatory Action to Improve Environmental Permitting and Advise Congress on Broader Legislative Permitting Reforms**

As the incoming administration is well aware, it has become too difficult to build new energy infrastructure in America, due largely to the byzantine environmental permitting process that imposes unnecessary and detrimental delays, followed by lengthy legal challenges once new projects have actually been permitted. AGA urges EPA to work with Congress to pass meaningful and durable environmental permitting reforms, which must include associated judicial reforms to ensure that natural gas and all energy infrastructure projects can deliver the reliable, affordable energy capacity our nation needs.

In the meantime, EPA can use its existing statutory authority improve the permitting morass within its own regulatory ambit, as well as by coordinating with partner agencies to improve jointly administered permitting programs—such as the U.S. Army Corps of Engineers, which is presently working on the March 2026 reauthorization of Clean Water Act Nationwide Permits. Several EPA-specific regulatory reforms of interest to AGA are listed below:

***Refine the regulatory definition of WOTUS.*** AGA members and other regulated entities continue to experience confusion about the scope and impact of how waters of the United States (“WOTUS”) is defined under the Clean Water Act. Although the Supreme Court clearly narrowed the scope of Clean Water Act jurisdiction in *Sackett v. EPA*, 598 U.S. 651 (2023), EPA has yet to properly conform its regulations to the *Sackett* holding. To help avoid further WOTUS-related regulatory whiplash, AGA encourages the incoming administration to make targeted revisions to the existing WOTUS rule to fully implement *Sackett*, rather than rescinding the prior administration’s WOTUS rulemaking and starting over from scratch. In addition, it would be helpful for EPA to work with the Army Corps to issue guidance clarifying how existing Clean Water Act regulations should be applied, as well as rescinding confusing and problematic guidance. It is imperative that EPA Regional Offices and Army Corps Districts have clear guidance on how existing regulations should be applied, and that existing regulations are applied consistently across EPA Regions and Army Corps Districts.

***Prohibit vague Clean Water Act permit conditions.*** AGA encourages EPA to prohibit vague, generic water quality conditions in Clean Water Act National Pollution Discharge Elimination System (“NPDES”) permits, such as the permit limits at issue in the recently argued case *San Francisco v. EPA*, No. 23-753 (U.S.). AGA joined a group of other industry trade associations in filing an amicus brief detailing our opposition to permit conditions that hold permittees directly liable for the quality of receiving waters rather than the quality of their own discharges to those waters.<sup>9</sup> Regulated entities have no way of knowing in advance whether their discharges comply with vague conditions of their NPDES permits because the quality of a waterbody often depends on numerous variables outside of an individual permittee’s control, such as dozens or even hundreds of other permitted and unpermitted discharges into the same waterbody. The vagueness of certain NPDES conditions also jeopardizes permittees’ security under the Clean Water Act’s

---

<sup>9</sup> See Brief of *Amici Curiae* National Mining Association, et al., Supporting Petitioner, *San Francisco v. EPA*, No. 23-753 (filed July 26, 2024), [https://www.supremecourt.gov/DocketPDF/23/23-753/320921/20240726142418631\\_23-753%20Amicus%20Brief.pdf](https://www.supremecourt.gov/DocketPDF/23/23-753/320921/20240726142418631_23-753%20Amicus%20Brief.pdf).

permit shield. EPA should end this practice of allowing impossibly vague permit conditions, regardless of whether the Supreme Court determines that it is prohibited under the Clean Water Act.

***Rein in EPA's regulatory reach under Clean Water Act Section 401.*** Clean Water Act Section 401 requires that any applicant for a federal license or permit that may result in a discharge to navigable waters obtain a water quality certification from the appropriate state or tribal authority in which the discharge will originate. Section 401 certification has long been a cause of delay and uncertainty for infrastructure projects like interstate natural gas pipelines. The prior administration's September 2023 final rule revising the Section 401 regulations went beyond EPA's authority under the Clean Water Act, most notably by expanding the scope of Section 401 reviews to address the "activity as a whole," rather than focusing only on the relevant discharge to jurisdictional waters. AGA urges the incoming administration to take appropriate steps to restore the common-sense reforms advanced during the initial Trump Administration and help ensure that the Section 401 permit process cannot be used to delay the construction of critical natural gas infrastructure.

### **Return the ENERGY STAR Program to its Core Principles**

AGA supports ENERGY STAR and urges EPA to return the program to its mission of providing "simple, credible, and unbiased information" on a product's energy efficiency in a fuel-neutral manner.<sup>10</sup> Past proposals to eliminate natural gas appliances from ENERGY STAR have undercut the program's value and purpose. In administering the program, EPA should be following the ENERGY STAR Products Program Strategic Vision and Guiding Principles, which state that specifications should be designed to "treat fuel types separately, so that consumers may find the right products for the fuel type in their home, as most make product replacements without switching fuel types" and "generally take a technology neutral approach to helping consumers identify the most efficient products within the category."<sup>11</sup>

Natural gas customers look to ENERGY STAR to help them make informed decisions about efficient home appliances, not to limit the availability of their choices in the marketplace. Eliminating the ENERGY STAR label for natural gas equipment would leave consumers with less information, potentially leading them to purchase less efficient products. Furthermore, AGA members' energy efficiency programs—which have yielded substantial energy savings and avoided GHG emissions—often rely on ENERGY STAR certification when determining eligibility for utility-provided incentives like appliance rebates. AGA urges the incoming administration to evaluate all recent and pending ENERGY STAR program revisions to ensure any changes are consistent with the program's core principles. In particular, AGA asks EPA to take the following actions:

***Review the Final Version 5.0 Furnace Specifications.*** On January 10, 2025, EPA issued the Final Version 5.0 ENERGY STAR Furnace Specifications with a target effective date of July 31, 2026 ("Final Version 5.0").<sup>12</sup> In Final Version 5.0, EPA proposes natural gas furnace performance requirements of 97 percent Annual Fuel Utilization Efficiency ("AFUE") for the U.S. North and 95 percent AFUE for the U.S. South. AGA supports the regional distinction for ENERGY STAR natural gas furnaces because it reflects the reality that, in general, homes in the southern half of the United States require less heat than homes in the northern half.<sup>13</sup>

---

<sup>10</sup> AGA supports EPA's continued use of "source energy," also referred to as "full fuel cycle," in its efficiency analysis. Source energy provides the most technically accurate method for determining overall energy consumption and energy savings, and it should be used by EPA and other federal agencies when assessing energy efficiency matters.

<sup>11</sup> ENERGY STAR® Products Program Strategic Vision and Guiding Principles (May 2012), [https://www.energystar.gov/sites/default/files/asset/document/ENERGY\\_STAR\\_Strategic\\_Vision\\_and\\_Guiding\\_Principles.pdf](https://www.energystar.gov/sites/default/files/asset/document/ENERGY_STAR_Strategic_Vision_and_Guiding_Principles.pdf).

<sup>12</sup> See ENERGY STAR, Final Version 5.0 (Jan. 10, 2025), <https://www.energystar.gov/furnace-version-5-pd>.

<sup>13</sup> See AGA, Letter re: Final Version 5.0 (Dec. 19, 2024), <https://www.energystar.gov/sites/default/files/2024-12/AGA%20Comments.pdf>.

However, AGA asks EPA to revise Final Version 5.0 so the level in the U.S. South would be 92 percent AFUE effective sometime during 2026. With AFUE in the U.S. North remaining at 97 percent, the revised specification would represent a two-percentage point increase in AFUE in both regions, thus preserving significant product availability for most consumers. It also would allow for significant energy savings in the U.S. North, where the average usage is more than twice that of the U.S. South, while continuing to incentivize more efficient, cost-effective options in the U.S. South.

***Withdraw the proposal to eliminate natural gas boilers from ENERGY STAR.*** On June 5, 2023, EPA proposed to eliminate efficient natural gas boilers from the ENERGY STAR program.<sup>14</sup> As discussed above, AGA strongly opposes proposals to remove natural gas products from the program. Thus, AGA urges EPA to withdraw its June 2023 proposal to sunset the ENERGY STAR Residential Boilers Specification.<sup>15</sup>

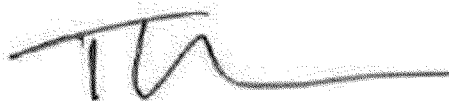
### **Improve the Transparency of Agency Actions via EPA's Website**

There is room for improvement to EPA's website, particularly with regard to the availability of documents like non-binding guidance and petitions for EPA action. EPA made some notable improvements in this area during the initial Trump Administration, particularly with the establishment of searchable databases of guidance documents, and AGA encourages EPA to expand on this progress over the next four years. Regulatory transparency is a significant issue not only for the regulated entities that currently struggle to locate all relevant pieces of the regulatory puzzle, but also for members of the public with an interest in EPA's administrative and judicial activities. For example, the Sierra Club NSPS petition discussed above is not readily available on EPA's webpage for administrative petitions to the Office of Air and Radiation, thereby hindering public participation in the administrative process for an issue of critical importance to many Americans—continued access to gas-fired heating appliances.

Thank you for your time and consideration. AGA is committed to being a resource for EPA and helping the agency develop legally durable rules that will stabilize the constant pendulum of environmental regulatory churn that upends business planning in the natural gas industry. We stand ready to work with the incoming administration to support policies that will ensure affordable and reliable energy for Americans while also protecting the environment for generations to come.

If you have any questions about this letter or would like to meet with AGA staff to discuss our environmental policy priorities, please contact Jennifer Baseman, Associate Counsel for Environment, at [jbaseman@aga.org](mailto:jbaseman@aga.org).

Sincerely,



Timothy R. Parr  
Deputy General Counsel  
American Gas Association

<sup>14</sup> See ENERGY STAR Residential Boilers Discussion Guide (June 5, 2023), [https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide%200.pdf?gl=1\\*103ldbi\\*ga\\*MTAwNjkzMjc0S4xNjcwNDI3MzMw\\*ga\\_S0KJTVVLQ6\\*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w](https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Residential%20Boilers%20Discussion%20Guide%200.pdf?gl=1*103ldbi*ga*MTAwNjkzMjc0S4xNjcwNDI3MzMw*ga_S0KJTVVLQ6*MTY4NTk4ODU4Ny4yODEuMS4xNjg1OTg5MzA5LjAuMC4w).

<sup>15</sup> See AGA, Letter re: Removal of Natural Gas Boilers from the ENERGY STAR Program (July 7, 2023), <https://www.energystar.gov/sites/default/files/asset/document/AGA%20Comments.pdf>.

American Gas Association  
400 North Capitol St., NW #450  
Washington, DC 20001

January 16, 2025

**To: President-elect Donald J. Trump  
Members of the Incoming Administration  
Members of the 119<sup>th</sup> United States Congress**

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of natural gas to more than 189 million Americans and 5.8 million businesses in all 50 states. Natural gas has been and will continue to be the cornerstone of America's economy and America's energy independence. Our natural gas industry is committed to investing, building and innovating for the families and businesses who depend on us every minute of every day. Natural gas utilities and our employees have delivered on the promise of America, and we are not done yet.

We look forward to working with the incoming administration and the 119<sup>th</sup> United States Congress to leverage our nation's abundant energy to build upon America's competitiveness. Our nation is breaking all previous records for increased natural gas demand, adding one new customer every minute of every day. In fact, during Winter Storm Heather (January, 2024), natural gas accounted for 62% of all energy delivered and set a new record. The current cold weather across the country will likely set yet another new record. Additionally, with expected growth in advanced manufacturing, artificial intelligence (AI) and liquefied natural gas (LNG) exports, demand will continue to increase. We must build modern pipeline infrastructure to deliver energy where it is needed and enable the economy of the future.

America has the best entrepreneurs and innovators on the planet, and their hard work has unlocked our abundant natural resources. Our members are proud of the contributions they have made to our country and are committed to delivering the most efficient natural gas and new advanced technologies, such as renewable natural gas and hydrogen, to meet our nation's and the world's energy needs.

Outlined below are five important steps that we stand ready to collaborate on to fully realize America's energy potential. These steps will have an immediate impact on bringing more affordable, reliable energy to all Americans, driving the economy and jobs of the future, advancing our national security and leading on innovation.

**Economic Competitiveness.** Affordable and reliable natural gas is the underpinning of the United States' economy. If we are serious about building the economy of the future, we need more energy, and we need a robust energy portfolio to ensure access to affordable and reliable energy for Americans. A strategic investment in America's energy future will:

- Unleash the power of AI, data centers and advanced manufacturing.
- Keep hospitals open and schools warm and bright.
- Empower hotels to support tourism and restaurants to prepare food.
- Sustain pharmaceutical companies as they manufacture life-saving drugs.
- Allow farmers to rely on American fertilizer to grow our food and meat processors to deliver fresh meat and chicken to grocery stores.

Recognizing the power of innovation and removing restrictions on advanced fuels will ensure our energy revolution continues far into the future. The economy of today and tomorrow depends on natural gas.

**Affordability and Consumer Choice.** The natural gas industry has a proven track record of working to help solve our nation's most complex challenges and advancing common sense solutions for all Americans. Our nation's abundant supplies of natural gas continue to provide Americans with the affordable and reliable energy they rely on. The average family that uses natural gas in their home saves \$1,132 on their utilities bills every year – money they can choose to spend on their family's priorities, whether that is education, rent or anything else.

We must advance policies that safeguard consumer choice in America's homes and businesses as well as the economic benefits that choice provides for consumers and communities across the country. Efforts to ban natural gas appliances have been soundly rejected by the American people and need to be overturned. Further, attempts to ban natural gas through state regulations or building codes are misguided at best. Fuel choice is clearly an important issue for American consumers: 26 states have already passed fuel choice legislation. Federal legislative or executive action is needed to further protect natural gas, a vital source of energy that is three times more affordable than electricity to heat our citizens' homes.

**Safety and Security.** Natural gas is an integral part of our nation's energy system, delivered through a 2.8-million-mile underground pipeline system. In order to continue to advance safety and security across the industry we must ensure the passage of reasonable and effective pipeline safety reauthorization. Funding for pipeline modernization must be a priority for both Congress and the administration. As cyber-attacks increase on critical infrastructure, America needs cybersecurity regulations that are risk-based and outcome-driven rather than compliance-driven. Both must also embrace the use of new and advanced technologies and refrain from prescriptive measures. Additionally, as physical attacks on our system and employees are becoming more prevalent, federal action to penalize perpetrators is warranted.

**Permitting Reform.** It's no secret that it's hard to build new energy infrastructure in America. The main culprits: a byzantine permitting process that imposes unnecessary and detrimental delays and a legal system that bogs down challenges to new projects for years in court. Congress must pass meaningful and durable permitting reform to include associated judicial reform for natural gas and all energy projects to deliver the energy capacity our nation needs. This much-needed reform will drive economic progress for this country, homeowners and businesses alike, and help ensure Americans have access to the reliable energy they want, need and expect.

**National Security.** The lynchpin to our way of life is our national security. To deliver economic benefits, jobs, security and keep our global adversaries at bay, natural gas is the critical piece of the puzzle to unleash America's potential. The national security dividend of not having to import natural gas from countries that don't share our values or interests is incalculable. We must restart the LNG export permitting process to support our allies and to provide greater global stability as we secure America's homeland. Thanks to advancements in natural gas technologies, the U.S. has become the number one producer and exporter of LNG and a global leader in reducing emissions while maintaining economic growth at home and increasing energy security.

We stand ready to work with the incoming administration and the 119<sup>th</sup> United States Congress to forge a path forward that will realize America's full energy potential.

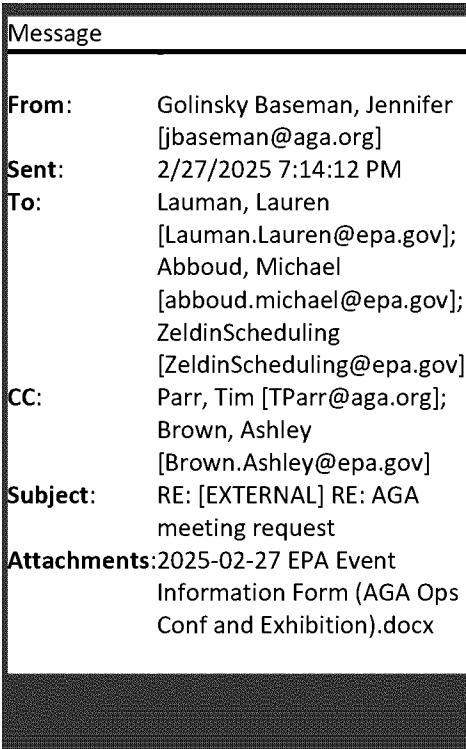
Sincerely,



**Lloyd Yates**  
President and Chief Executive Officer,  
NiSource Inc.  
Chair, American Gas Association



**Karen Harbert**  
President and Chief Executive Officer,  
American Gas Association



**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Michael, Lauren –

Attached please find AGA’s event information form inviting Administrator Zeldin to AGA’s Exhibition and Operations Conference on Tuesday, May 6, 2025 in Aurora, Colorado. Please let us know if you need any additional information or have any questions.

Thank you for considering our invitation!

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

**From:** Golinsky Baseman, Jennifer

**Sent:** Tuesday, February 25, 2025 2:21 PM

**To:** 'Lauman, Lauren' <Lauman.Lauren@epa.gov>; 'Abboud, Michael' <abboud.michael@epa.gov>; 'zeldinscheduling@epa.gov' <zeldinscheduling@epa.gov>

**Cc:** Farrell, Carolyn <CFarrell@aga.org>; 'brown.ashley@epa.gov' <brown.ashley@epa.gov>

**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Michael, Lauren –

Attached please find AGA’s meeting request form, along with two AGA letters referenced in the form (re: proposed meeting topics and briefing materials). Please do not hesitate to let me know if you need additional information.

We are ironing out some final details for our event request form for AGA's May Exhibition and Operations Conference and hope to have that over to you very soon.

Thank you!

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Sent:** Thursday, February 13, 2025 3:41 PM

**To:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>; Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** RE: [EXTERNAL] RE: AGA meeting request

Thanks Lauren! We'll get our ducks in a row on the event and meeting request forms and send those over to you next week. In the meantime, here is a quick hit on our May 2025 Exhibition and Operations Conference ([available here](#) and shown below):

**2025 AGA Operations Conference & Biennial Exhibition & Spring Committee Meetings**

**May 5, 2025 – May 8, 2025**

Aurora, CO

The annual AGA Operations Conference is the natural gas industry's premier gathering of natural gas utility and transmission company operations management from across North America and the world for the sharing of technical knowledge, ideas, and practices to promote the safe, reliable, and cost-effective delivery of natural gas to the end-user. The Operations Conference is AGA's largest forum with regularly more than 900 operations management in attendance, including 100 speakers, and over 120 technical presentations that run the gamut of topics, such as gas measurement, operations advocacy, safety, environment, storage, engineering, construction and maintenance, gas control, supplemental gas, corrosion control and piping materials.

**Spring Committee Meetings**

AGA's Operations Technical Committee's will be meeting May 5-6, in conjunction with the Operations Conference.

**2025 Exhibition**

The 2025 exhibition will be held in conjunction with the conference. The exhibition attracts approximately 250 domestic/international vendors occupying 50,000+ square feet of Exhibit Space, including large islands.

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.

---

**From:** Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Sent:** Thursday, February 13, 2025 12:07 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** [EXTERNAL] RE: AGA meeting request

You don't often get email from [lauman.lauren@epa.gov](mailto:lauman.lauren@epa.gov). [Learn why this is important](#)

Hi Jen and Carolyn!

Great to meet you both, look forward to hearing about the expo and speaking with you both in the future! Please let me know if you need anything else.

Thank you,  
Lauren

---

**From:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Sent:** Thursday, February 13, 2025 9:56 AM

**To:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>; Lauman, Lauren <[Lauman.Lauren@epa.gov](mailto:Lauman.Lauren@epa.gov)>

**Subject:** RE: AGA meeting request

Hey Jen, great talking also cc'ing Lauren from my team. I attached the forms to fill out for the event and meeting requests. Would love to get more details about the expo in May if that is a possibility.

---

**From:** Golinsky Baseman, Jennifer <[jbaseman@aga.org](mailto:jbaseman@aga.org)>

**Sent:** Wednesday, February 12, 2025 4:30 PM

**To:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>

**Cc:** Farrell, Carolyn <[CFarrell@aga.org](mailto:CFarrell@aga.org)>

**Subject:** AGA meeting request

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Michael –

I just left you a voicemail but wanted to follow up by email as well. AGA's President and CEO, [Karen Harbert](#), is hoping to schedule a meeting with the Administrator to discuss AGA's environmental priorities and how our trade association can be helpful to EPA. AGA Board Chair [Lloyd Yates](#) of NiSource may wish to participate in the meeting as well, depending on his schedule.

In case you have not seen them yet, I am attaching AGA's January 16 letter to the EPA Transition Team and AGA's broader letter to the Administration and 119<sup>th</sup> Congress regarding our organization's priorities. I anticipate that Karen and Lloyd will want to discuss these issues with Administrator Zeldin in their meeting.

I am copying Carolyn Farrell, Manager of the AGA President's Office, to help with meeting scheduling. Please let me know if there is any additional information I can provide that would be helpful.

Best,

Jen

**Jennifer Golinsky Baseman | Senior Counsel, Environment**

American Gas Association

400 N. Capitol St., NW | Washington, DC | 20001

P: 202-824-7340 | [jbaseman@aga.org](mailto:jbaseman@aga.org)

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 74 million customers throughout the nation.



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

### Basic Background

Event official title:	<b>2025 AGA Operations Conference and Biennial Exhibition</b>
Event host(s)/organizer(s):	<i>List all hosts organizing the event. Note if this is an EPA hosted or co-hosted event.</i> <b>Hosted by the American Gas Association (AGA)</b>
Event date (flexible?):	<b>Tuesday, May 6, 2025 (firm date)</b>
Time, duration, and time zone of event:	<i>E.g., 12:00pm through 3:00pmEST</i> <b>Fireside chat during Operations Conference General Session: approximately 4:45 to 5:15 PM Mountain Time</b> <b>Opening reception in Exhibit Hall: 5:30 to 8:00 PM Mountain Time</b>
<b>Deadline for acceptance:</b>	<b>April 5, 2025</b>
Will you accept a surrogate?	N/A
Event location and physical address:	<i>E.g., ABC Convention Center, 123 Boulevard Way, Baltimore, MD, 56789</i> <b>Gaylord Rockies Resort &amp; Convention Center</b> <b>6700 North Gaylord Rockies Boulevard</b> <b>Aurora, CO 80019</b> [ <a href="https://www.marriott.com/en-us/hotels/dengr-gaylord-rockies-resort-and-convention-center/overview/">HYPERLINK "https://www.marriott.com/en-us/hotels/dengr-gaylord-rockies-resort-and-convention-center/overview/"</a> ]
Type of event:	<i>Reception; Conference; Meeting; Recorded/Streaming audio or video, etc.</i> <b>The fireside chat will take place during AGA's Operations Conference. The opening reception will take place in the Exhibit Hall, so the Administrator would be able speak informally with natural gas industry professionals while simultaneously visiting the exhibition booths.</b>
Host(s) relationship to the EPA?	<b>No formal relationship. AGA is an interested stakeholder of EPA's regulatory and policy actions.</b>
Event sponsor(s):	<b>Event sponsors as of February 27:</b> <b>Altec</b> <b>Burns and McDonnell</b> <b>Centuri</b> <b>Dresser Utility</b> <b>Eagle Research Corporation</b> <b>Emerson</b> <b>ENTRUST Solutions Group</b> <b>Hubbell</b> <b>Itron</b>



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

JANA  
Locusview  
Magnolia River  
Mosaic  
RCP  
SENSIT Technologies  
TD Williamson  
Urbint  
West Monroe  
WL Plastics  
Xcel Energy (host utility)

### Event Description and Role of the EPA Official

Purpose of event:

The annual AGA Operations Conference is the natural gas industry's premier gathering of natural gas utility and transmission company operations management from across North America and the world for the sharing of technical knowledge, ideas, and practices to promote the safe, reliable, and cost-effective delivery of natural gas to the end-user. The Operations Conference is AGA's largest forum with more than 900 operations management personnel in attendance, including 100 speakers, and over 120 technical presentations that run the gamut of topics such as gas measurement, operations advocacy, safety, environment, storage, engineering, construction and maintenance, gas control, supplemental gas, corrosion control, and piping materials.

The 2025 AGA Biennial Exhibition will be held in conjunction with the Operations Conference. The exhibition attracts approximately 250 domestic and international vendors occupying 50,000+ square feet of exhibit space, including large islands. Vendors will be exhibiting new, emerging, and established technologies and products that support natural gas operations in various industry segments.

*List here or provide separately in response*

Brochure/website/invitation/ and/or other event materials:

The information above is available to the public here: [ HYPERLINK "<https://www.aga.org/events/2025-aga-operations-conference-biennial-exhibition-spring-committee-meetings/>" ]. Additional invitation details are made available only to AGA members via a password-protected website and pertain largely to logistical arrangements like hotel bookings and AGA committee meetings. Please let us know whether you require additional information about the event.

Run of show/agenda:

*Provide full agenda of event, including events immediately before/following the EPA official's participation*



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

	<p><b>Operations Conference Opening General Session</b>  <b>3:45 PM to 5:15 PM Mountain Time</b></p> <ul style="list-style-type: none"> <li>• Welcome remarks – Lauren Gilliland, Vice President of Gas, Xcel Energy</li> <li>• Presentation on state of the natural gas industry – Karen Harbert, President and CEO of AGA</li> <li>• AGA Safety Awards</li> <li>• Fireside chat with the Administrator, facilitated by AGA President and CEO Karen Harbert (potentially joined by the CEO of an AGA member gas utility, TBD)</li> </ul> <p><b>Opening Reception in Exhibit Hall</b>  <b>5:30 PM to 8:00 PM Mountain Time</b></p> <ul style="list-style-type: none"> <li>• Official ribbon-cutting ceremony to open the Exhibition Hall</li> <li>• Opening reception for AGA committee attendees, conference delegates, and guests</li> <li>• Exhibit booths will remain open during the reception</li> </ul> <p><b>There are no official events scheduled after 8:00 PM.</b></p>
Timing for EPA official’s role:	<p><i>Example: 1:00pm to 1:15pmEST</i></p> <ul style="list-style-type: none"> <li>• 4:45 to 5:00 PM Mountain Time (approximately) = fireside chat</li> <li>• 5:30 PM Mountain Time onward = participation in opening reception and exhibitions for as long as the Administrator would like to stay (the event concludes at 8:00 PM).</li> </ul>
Role of the EPA official at the event:	<p><i>Attendance only? Panel presentation? Speaker? Participating in press conference? Touring a facility? Etc.</i></p> <p><b>We are inviting the Administrator to participate in a fireside chat on the natural gas industry, led by AGA’s President and CEO. If the Administrator accepts, we plan to also invite the CEO of an AGA member gas utility to participate in the chat.</b></p> <p><b>Separately, we are inviting the Administrator to attend the opening reception in our Exhibition Hall. His role at this portion of the event is flexible—he is free to converse with attendees from the natural gas industry and/or visit the exhibition booths.</b></p>
Requested presentation topic (if speaking):	<b>EPA and the Trump Administration’s plans to support the natural gas industry.</b>
Requested presentation format:	<p><i>Keynote, panel, Q&amp;A, introduction, fireside chat, etc.</i></p> <p><b>Fireside chat</b></p>



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

Name and title of person introducing EPA official:	<b>Karen Harbert, President and CEO of the American Gas Association</b>
Audience make up?	<p><i>Size of audience and brief description. E.g., 100 expected in attendance made up of attorneys, business owners, students, industry, employees, etc.</i></p> <p><b>During the fireside chat, we expect over 1,000 attendees made up of a variety of natural gas industry professionals—including some who focus on environmental regulatory compliance and policy and many others on natural gas operations, engineering, field activities, distribution and transmission system integrity, construction, human resources, safety and occupational health, and management. AGA’s core membership is natural gas distribution utilities/companies, but it also includes companies from across the natural gas industry, including transmission and storage, marketing, and products and services companies. Staff members from AGA will also be in attendance.</b></p> <p><b>During the reception and exhibition, the attendees above will be present, plus the exhibition vendors and additional guests of attendees (e.g., spouses of AGA member attendees).</b></p>
Event held weekly, monthly, annually?	<b>The Operations Conference is held annually. The Exhibition is held biennially.</b>

### Event Preparation

Other EPA speakers?	<p><i>Name and titles of EPA personnel</i></p> <p><b>N/A</b></p>
Does EPA need to submit materials prior to event?	<p><i>Registration Form? Biography? Picture? Copy of presentation, speaker release form, etc?</i></p> <p><b>For logistical purposes, please provide the names of any staff who will be accompanying the Administrator at the event. If it is not possible to provide the names of each individual (e.g., for security purposes), we ask that you give us an approximate headcount of total individuals who will be with the Administrator.</b></p>
Expected prep and timing for prep calls or meetings:	<b>We are happy to have a prep call/meeting for the Administrator and/or his staff if he wishes, scheduled at his convenience.</b>



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

Registration fee charged? How much?	<b>The registration fee can range from \$550 to \$3,700 depending on: which segment(s) of the week-long event a participant decides to register for; whether the participant is an AGA member; and if the participant registers during our “early bird” window, during the regular advance-registration window, or onsite upon arrival at the event. The registration fee includes food and beverage costs for each event but excludes an individual’s lodging costs. Neither the Administrator nor his staff would be required to pay any registration fees.</b>
Describe entity hosting EPA official:	<i>Private company; 501(c)(3); 501(c)(4); 501(c)(6); 527 Political Action Committee; academic institution; etc.</i>  <b>AGA is a 501(c)(6) tax-exempt organization incorporated in the State of Delaware as a non-stock, non-profit entity.</b>
Is the entity also a Federally Registered Lobbyist?	<i>Yes / No</i>  <b>Yes, AGA is a federally registered lobbying organization under the Lobbying Disclosure Act.</b>
Are you giving a gift, award or anything else of value? Amount?	<i>E.g., Speaker or courtesy gift; award; plaque; travel support (hotel, transportation, etc.) etc., + description and value</i>  <b>None</b>
Are you providing a meal? Amount?	<b>There will be light fare (e.g., appetizers and beverages) at the reception.</b>

### At the Event and Other Event Logistics

Is there a private hold room available for the Administrator?	<b>Yes, we can arrange for a private hold room.</b>
Open press/closed press?	<b>The event is typically open to the press; however, we will accommodate the Administrator’s needs regarding media.</b>
Will you be issuing a press release?	<b>AGA will be issuing a press release on the broader, week-long event. The release typically does not mention specific speakers or presenters. We are happy to work with EPA communications staff on this upon request.</b>
Person to contact for media purposes:	<i>Name &amp; Title; Email; Office Number, Cell Number</i>  <b>Emily Carlin, Director of Public Relations, AGA [ <a href="mailto:ecarlin@aga.org">HYPERLINK "mailto:ecarlin@aga.org"</a> ] 202-824-7278</b>
Dress code:	<i>Casual/Business/Black Tie Optional/Black Tie/Etc.</i>  <b>Business or business casual attire is recommended for our featured guests. Some attendees likely will be in casual attire.</b>



## EPA ADMINISTRATOR EVENT INFORMATION FORM

*This form assists in planning participation in events and activities. Please be complete to minimize need for follow up. This is not a confirmation of attendance.*

Room setup:	<i>What kind of microphone? What is the room setup? Is there a podium?</i>  <b>The room will be set in rounds tables for attendees, with chairs for the speakers on stage (set up in a talk-show format for the fireside chat). We can provide either a wireless microphone or a lavalier microphone.</b>
Notable/honorable guests attending (including elected officials):	<b>Karen Harbert, President and CEO of the American Gas Association</b> <b>TBD CEO of AGA-member gas utility company</b>
Are you recording the event? Website URL for recording (if event is recorded and posted):	<b>The event will not be video recorded.</b>
Security contact:	<i>Name &amp; Title; Email; Office Number, Cell Number</i>  <b>Carlos Pelham, Managing Director, Meetings and Conference Services, AGA</b> [ <a href="mailto:cpelham@aga.org">HYPERLINK "mailto:cpelham@aga.org"</a> ] <small>Ex. 6 Personal Privacy (PP)</small>
Directions to event (include relevant information about parking, the specific building, best entrance to use)	<b>Please use the main hotel entrance. The hotel has valet and self-parking options.</b>
Where to meet contact:	<b>Please meet at the conference registration desk, which will be located in the conference area via the walkway from the main hotel. There will be signage or you may ask the hotel staff to direct you to the conference area for AGA.</b>

### Contact Information

Your name and position:	<b>Jennifer Baseman, Senior Counsel for Environment, AGA</b>
Phone (best & alternate):	<small>Ex. 6 Personal Privacy (PP)</small>
Email address:	[ <a href="mailto:jbaseman@aga.org">HYPERLINK "mailto:jbaseman@aga.org"</a> ]
Mailing address:	<b>Jennifer Baseman</b> <b>American Gas Association</b> <b>400 North Capitol Street, NW</b> <b>Washington, DC 20001</b>
Are you the point-of-contact at the event? If not, contact details:	<b>No, the point-of-contact at the event will be:</b> <b>Timothy Parr, Deputy General Counsel, AGA</b> [ <a href="mailto:tparr@aga.org">HYPERLINK "mailto:tparr@aga.org"</a> ] <small>Ex. 6 Personal Privacy (PP)</small>

*Please return this completed form to [ [HYPERLINK](#) Ex. 6 Personal Privacy (PP) ] and copy [ [HYPERLINK "mailto:brown.ashley@epa.gov"](mailto:brown.ashley@epa.gov) ]*