

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Certification of New Interstate Natural Gas Facilities)	
)	Docket No. PL18-1-000
)	
Consideration of Greenhouse Gas Emissions in Natural Gas Infrastructure Project Reviews)	
)	Docket No. PL21-3-000
)	

COMMENTS OF THE GPA MIDSTREAM ASSOCIATION

The GPA Midstream Association (“GPA Midstream”) appreciates the opportunity to submit these comments in response to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) March 24, 2022 Order on Draft Policy Statements (“March 24 Order”), which invited comments on the Commission’s draft Updated Policy Statement on Certification of New Interstate Natural Gas Facilities (“Updated CPS”) and Interim Policy Statement (“GHG Statement” and, collectively with the Updated CPS, “Draft Policy Statements”).

GPA Midstream has served the U.S. energy industry since 1921 and has over 60 corporate members that directly employ more than 60,000 employees that are engaged in a wide variety of services that move vital energy products such as natural gas, natural gas liquids (“NGLs”), refined products and crude oil from production areas to markets across the United States, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 320,000 jobs across the U.S. economy. GPA Midstream members recover more than 80% of the NGLs such as ethane, propane, butane, and natural gasoline produced in the United States from more than 380 natural gas processing facilities. In the 2018-2020 period, GPA Midstream members

spent over \$90 billion in capital improvements to serve the country's needs for reliable and affordable energy.

At GPA Midstream, we are the primary advocates for a sustainable midstream energy sector focused on enhancing the viability of natural gas, natural gas liquids, and crude oil. We acknowledge that slowing climate change is a global endeavor that requires long-term commitment and action, and believe that sustainable development of interstate pipeline infrastructure and LNG export terminals are crucial both to that endeavor and to ensure the energy independence of the United States. As such, GPA Midstream supports the comments provided by the Interstate Natural Gas Association of America's ("INGAA") to the Draft Policy Statements—the comments are thorough, legally sound, and demonstrate the importance of natural gas infrastructure projects to the United States economy, and global goals relating to the slowing of climate change and independence from the import of Russian oil and natural gas liquids.

Interstate natural gas infrastructure, including regulated interstate pipelines and LNG export terminals, are crucial for GPA Midstream members' ability to provide clean-burning natural gas to the United States and globally. Many GPA Midstream members are shippers utilizing this infrastructure on behalf of upstream producers. The Draft Policy Statements could have the effect of chilling future natural gas infrastructure development, and such an outcome is directly contra to the benefits the Biden Administration has explicitly acknowledged when it banned the import of Russian oil and natural gas liquids.¹

¹ White House Press Briefing, Background Press Call by a Senior Administration Official on Announcement of U.S. Ban on imports of Russian Oil, Liquefied Natural Gas, and Coal (Mar 8, 2022), <https://tinyurl.com/3exmene8>. ("The United States is only able to take this step [of banning the import of Russian oil] because of our strong domestic production and infrastructure.")

As Chairman Glick recently noted, “there is no question that we need a lot more . . . [natural gas] infrastructure if we are to fully realize the benefits of the abundant resources with which we are so blessed,” and also that “American energy in all its forms depends on a robust energy infrastructure . . . World events and the situation here in the U.S. [such as the high cost of consumer fuel prices] reminds us that infrastructure, including pipelines, LNG export facilities, and [] electric transmission facilities . . . play an essential role in ensuring that American energy is available for our citizens and our allies around the world.”² A streamlined and dependable process of seeking FERC approval for such regulated infrastructure is essential to realizing these benefits. Presently, the Draft Policy Statements contain various impediments that will neither help reduce the cost of fuel at home or protect our allies from reliance on imports of bad actors and aggressors. These impediments will certainly not ensure that cleaner-burning natural gas is used both at home and globally in lieu of less efficient fuel sources that will only result in an increase of carbon dioxide and GHG emissions.

On behalf of GPA Midstream’s members, we urge the Commission to fully adopt the comments provided by INGAA to achieve the goals we have all set for the future of American energy independence and in the fight against climate change.

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² FERC, Chairman Glick’s Press Conference Remarks (Apr. 21, 2022), <https://tinyurl.com/2p98bf25>.

Respectfully submitted,

A handwritten signature in black ink that reads "Matthew Hite". The signature is written in a cursive style with a large, stylized initial 'M'.

Matt Hite
Vice President of Government Affairs
GPA Midstream Association
mhite@gpamidstream

DATED: April 25, 2022