

## **Business Council for Sustainable Energy Comments on the Greenhouse Gas Reporting Program Reconsideration Docket ID EPA-HQ-OAR-2025-0186 October 2025**

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) reconsideration of the Greenhouse Gas Reporting Program (GHGRP). BCSE is a coalition of companies and trade associations representing the full range of commercially available technologies and services that provide clean, reliable, and affordable energy. Our membership spans energy efficiency, renewable energy, natural gas, and advanced fuels, among others.

### ***Overview***

BCSE supports maintaining the GHGRP as a mandatory program under Section 114 of the Clean Air Act. The GHGRP has provided a consistent, transparent, and verifiable reporting framework for more than 15 years, enabling U.S. industry to benchmark emissions performance, plan long-term investments, and demonstrate environmental leadership in domestic and global markets. Maintaining this program supports business certainty, facilitates state and federal policy implementation, and underpins the nation's competitiveness in low-carbon markets.

At the same time, BCSE recognizes that industry stakeholders have actively worked to improve the program's accuracy and flexibility, particularly under Subpart W for methane emissions in the natural gas sector. These efforts show that the program is capable of evolving to reflect technological advances and best practices while continuing to deliver meaningful, verifiable emissions reductions.

### ***Industry-Driven Greenhouse Gas Reporting Improvements***

BCSE members and affiliated trade associations have consistently worked to improve the accuracy, transparency, and flexibility of GHG reporting. Key improvements include:

1. Adoption of advanced methane detection and measurement technologies – Companies are deploying mobile leak detection, aerial surveys, and other direct measurement methods to enhance emissions accuracy. BCSE supports EPA establishing a clear pathway to integrate emerging technologies into Subpart W, allowing the program to reflect rapid technological advancements while improving data quality.
2. Site-specific, company-specific, and collaboratively developed emission factors – Allowing reporters to develop emission factors tailored to their facilities, or in collaboration with other companies/utilities, improves accuracy by reflecting real-world operations and achieved emission reductions. Default emission factors can overstate emissions, particularly in downstream natural gas operations, while company-specific data incentivizes further reductions.
3. Voluntary programs and collaborative initiatives – BCSE members have participated in EPA-sponsored voluntary programs such as the Natural Gas STAR Program (since 1993), the Methane Challenge (since 2016). These EPA programs are no longer operating, but were extremely successful in driving outcomes. BCSE members also participate in privately sponsored voluntary programs like the NGSI Methane Emissions Intensity Protocol (which relies heavily on GHGRP methodologies and reported data). Collectively, these programs have reduced methane

emissions from U.S. natural gas distribution by 70% from 1990 to 2022. These voluntary efforts—which complement but do not replace the mandatory federal reporting requirements—demonstrate the gas sector’s commitment to continuous improvement.

4. Transparency and sustainability certification – Many companies are acquiring certified lower-methane intensity natural gas, leveraging programs such as MiQ, EO100TM, and Project Canary’s Responsibly Sourced Gas, which incorporate independent verification. These initiatives increase transparency across the supply chain and create incentives for further emissions reductions.

### ***Global Competitiveness and Market Access***

Maintaining and improving the GHGRP ensures U.S. producers have credible, verifiable emissions data for use in domestic and international markets. Trading partners increasingly require high-quality reporting, and GHGRP data supports compliance with global carbon programs and incentives. Accurate, transparent reporting also allows U.S. companies to demonstrate the emissions reductions achieved through operational improvements and technology adoption, supporting competitiveness in low-carbon value chains. The U.S. is serving world markets and by doing so is cementing its global leadership and geopolitical ascendancy. U.S. producers have strong environmental performance and should clearly quantify that advantage to ensure America’s energy dominance in this critical sector.

### ***Regulatory Certainty and Policy Integration***

GHGRP data underpins federal and state tax credits and incentive programs. Maintaining the program ensures regulatory consistency, supports long-term investment planning, and facilitates the efficient administration of incentives and compliance obligations. Verified, publicly available data strengthens market confidence and informs investment and policy decisions.

While EPA has noted potential near-term savings from pausing or eliminating certain reporting requirements, BCSE emphasizes that the broader benefits of maintaining and improving the GHGRP—including enhanced data accuracy, global market credibility, incentivizing technological innovation, and supporting long-term investment—are critical to U.S. economic and energy leadership.

### ***Recommendations***

To strengthen the GHGRP and incorporate industry-driven improvements, BCSE recommends that EPA:

1. Maintain the GHGRP as a mandatory program under Section 114.
2. Continue Subpart W data collection without interruption, while enabling integration of emerging methane detection and measurement technologies.
3. Allow broader use of site-specific, company/utility-specific, and collaboratively developed emission factors to reflect actual operations and incentivize reductions.
4. Provide sufficient lead time and flexibility for facilities to implement new reporting methodologies.
5. Retain e-GGRT and public access to verified facility-level data.
6. Quantify and consider state, federal, and private-sector reliance interests in the final rulemaking.

### ***Conclusion***

BCSE strongly supports maintaining the GHGRP as a cornerstone of U.S. energy policy. Incorporating industry feedback on Subpart W, encouraging innovation in methane detection, and maintaining transparency and credibility ensures the program continues to drive accurate reporting, emissions reductions, global competitiveness, and regulatory certainty—while supporting U.S. economic and energy leadership.