August 27, 2010

By Electronic Mail

Arthur Marin, Executive Director
Northeast States for Coordinated Air Use Management (NESCAUM)
89 South Street, Suite 602
Boston, MA 02111

Dear Mr. Marin,

I write on behalf of America’s Natural Gas Alliance (ANGA). ANGA exists to promote the economic, environmental and national security benefits of greater use of clean, abundant, domestic natural gas. We represent 34 of North America’s largest independent natural gas exploration and production companies and the leading developers of the shale plays now transforming the clean energy landscape. As we make decisions about our clean energy future, ANGA seeks to inform and engage all stakeholders about the opportunities presented by greater use of this clean, abundant energy resource - improving air quality, adding jobs to our economy and enhancing our energy security. Through ANGA, the natural gas community is standing together to promote the benefits of natural gas to a wide range of audiences, including electric power utilities, non-governmental organizations, federal and state policymakers and regulators, as well as the consumers and communities who will be the ultimate beneficiaries of this new age of natural gas abundance.

ANGA appreciates the efforts of the Northeast and Mid-Atlantic states to evaluate the adoption of a regional low carbon fuel standard (LCFS) that would create incentives to reduce the carbon intensity of the region’s current transportation fuel mix. ANGA is new to this process and we have not had the opportunity to review the Draft Data and Assumptions for the Economic Analysis. Therefore we are unable to provide detailed comments. We are encouraged that natural gas is properly identified as a potentially critical low carbon compliance fuel for an LCFS and look forward to the results of the analysis. However, we also understand that the Data and Assumptions are made only for the purpose of the economic analysis and do not bind the participating states in any way in terms of policy decisions going forward.

We thank the Northeast and Mid-Atlantic states for their commitment to robust stakeholder engagement and look forward to taking an active role in the stakeholder process as you move from the economic analysis to developing the regional policy framework.

Sincerely,

Peter D. Robertson
Senior Vice President for Legislative and Regulatory Affairs