



November 16, 2022

North American Energy Standards Board
801 Travis Street
Suite 1675
Houston, TX 77002

Re: Comments on Certified Gas Frequently Asked Questions Document

Dear Mr. Sappenfield:

Environmental Defense Fund (EDF), Equitable Origin, and MiQ respectfully submit the following comments on the NAESB Certified Gas Addendum Frequently Asked Questions (FAQ) document. The purpose of these comments is to offer additional guidance that should be included as an attachment to the FAQ document. While the Addendum allows parties with a great deal of flexibility, it does not explicitly explain the importance of key terms and provisions that would ensure a rigorous and complete certification. Given the heightened importance of this effort and the risks that a subpar Addendum will have on the development of the certified gas market, the following guidance will help ensure that a Certificate is rigorous, transparent, and clear. EDF, Equitable Origin, and MiQ propose that the following set of questions be included as an attachment to the FAQ document. These questions will help guide Buyers and Sellers as they navigate Certified Gas transactions and further facilitate transactions in the market.

Proposed Attachment to FAQ Document

The following guidance is provided to Buyers and Sellers to aid in their understanding of Certified Gas transactions. This set of questions will improve the nascent certified gas market by helping Buyers and Sellers to ensure their Certifications are rigorous, transparent, and clear.

- What is the portion of the total assets at the basin level that is certified? The Buyer should ask for both the production percentage and wells percentage. This is particularly relevant to disclose for those certifications that might only include 2 well pads but could account for up to 80% of the production (e.g., if the well pads are new).
- What portion of the certification does this represent against the entire company's portfolio both domestically and internationally?

- Is the certification transparent and are all standards publicly available?
- Is the certification independent of the outcome of the certification assessment (and therefore free of conflicts of interest)?
- Does the certification include certain key performance indicators of interest to the Buyer? If so, are the calculation methodologies publicly disclosed fully so that the Buyer knows what formulas have been used to calculate those indicators? Are the indicators publicly disclosed?
- If the methane intensity is specified, how was this calculated and for which segment(s) of the natural gas supply chain?
- If the methane intensity is specified for this contract, what is the total methane intensity of the entire portfolio both domestic and international for comparison?
- Were direct measurements performed at the site level for methane and how were these measurements included in reconciling the methane emissions inventory?
- If the Buyer is asking for a certain methane intensity to be met as a requirement in the contract, what specifically is meant with regards to the segment of the supply chain and formula to be used and does the certification's methodology align with the Buyer's requirements?

EDF, Equitable Origin, and MiQ thank NAESB for the opportunity to submit these comments and look forward to continuing to engage in this process.

Sincerely,

/s/ Natalie M. Karas

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