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To: Washington Utilities and Transportation Commission
From: Rob Briggs
Date: June 2, 2020
Subject: Docket Number UE-191023 – Comments on First Discussion Draft Rules for Clean Energy Implementation Plan - Upstream gas emissions requirements

The definition for carbon dioxide equivalent currently reads:

“Carbon dioxide equivalent” or “CO₂e” means a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.”

I recommend that be changed to:

"Carbon dioxide equivalent" or "CO₂e" (customarily expressed in units of metric tons of carbon dioxide) is a standard measure of global warming impact that enables the effects over time of different greenhouse gases to be compared and combined into a single quantity."

Rationale for change:

- "Metric measure" is a bit awkward because "metric" can mean measure or index, and CO₂e does not have to be represented in metric units.
- “Global warming potential” (GWP) is already a reserved phrase in this context with a specific meaning other than the sense in which it is being used here.
- I believe the current discussion draft definition better describes GWP than CO₂e. The distinction is whether it is describing the properties of the various greenhouse gases or their effective impacts, which can be quantified individually or collectively. Most uses of CO₂e involve aggregate impacts, and the discussion draft definition does not acknowledge that primary use.

WAC 480-100-665 Reporting and compliance, (3) Annual Clean Energy Progress Reports states that the report must include (g) “Total greenhouse gas emissions in metric tons of CO₂e.” I think the reporting requirement should specify that the disaggregated components of the total must be reported. At minimum, that reporting should be disaggregated by individual greenhouse gases--carbon dioxide, methane, and nitrous oxide--and by energy source--coal, oil, and natural gas, including disaggregated upstream and downstream components. The disaggregation should, for example, distinguish between emissions attributable to parasitic loads in gas production such as from pumps and fans, from emissions attributable to leaked methane.

Currently this reporting requirement does not anticipate requirements expected to result from Department of Ecology rulemaking in response to Governor Inslee's Directive 19-18 on fossil-fuel greenhouse gas emissions. I suggest this wording be modified to specify minimum life-cycle reporting requirements until supplanted by requirements developed by Ecology.

Respectfully submitted,

Rob Briggs