

November 4, 2019

UE Docket No. 190652: EIA Rulemaking

Vashon Climate Action Group Comment on Greenhouse Gas Emissions Reporting

The Vashon Climate Action Group supports adding a requirement in WAC 480-109-300 that electric companies report on greenhouse gas emissions occurring in all phases prior to final combustion of fuel for electricity generators.

As stated in the October 4, 2019 “Notice of Opportunity to File Written Comments,” regarding changes to WAC 480-109:

“...The Laws of 2019, Chapter 285, § 15, requires natural gas companies to put a price-per ton cost on greenhouse gas emissions, including ‘emissions occurring in the gathering, transmission, and distribution’ processes.”

Adding language to WAC 480-109-300 which requires that electric companies report on greenhouse gas emissions occurring in all phases prior to final combustion of fuel for electricity generators will provide the Utilities and Transportation Commission (Commission) with the data it needs to monitor compliance.

Specifically, data reporting the amount of emissions during pre-combustion processes will enable the Commission to:

- quantify the total amount of emissions produced; and/or
- assess the accuracy of emission assessments upon which natural gas companies base the total social cost of greenhouse gas emissions; and
- ensure that the prices that natural gas companies assign to greenhouse gas emissions are realistic, fact-based and fair.

The total lifecycle greenhouse gas reporting requirement added to WAC 480-109-300 will provide more meaningful oversight and enforcement of Section 15 of the Clean Energy Transformation Act.