

To: Utilities and Transportation Commission  
From: Doug Howell, Sierra Club  
RE: Comments on Docket UE-190653, the rulemaking for the Energy Independence Act  
Date: November 4, 2019

These comments relate to the section on Greenhouse gas emissions reporting.

#### Question 7

We support inclusion of “carbon dioxide equivalent” and “greenhouse gases.” Review of emissions must be comprehensive. We are learning that natural gas facilities have much greater emissions when including the leaking methane from wellhead to end use. Disregarding these emissions would understate and misrepresent the real climate impacts and therefore must be included.

#### Question 9

The UTC needs to define an emissions rate for leaking methane. There are a number of principles that need to go into this calculation, including but not limited to:

- Use of the most recent and best available science. For example, some companies have been using the now older International Panel on Climate Change Assessment Report Four (AR4) instead of the more recent Assessment Report Five (AR5). This is an important distinction as AR5 demonstrates that unburned methane has much greater climate impacts than was understood when AR 4 was released.
- Use a regional fuel analysis. No facility is likely to get a source of fuel from one source. Choosing an individual source has two damaging and misrepresentative outcomes. First, it has the effect of cherry picking a source the proponent believes to be less damaging to the climate. Second, and most important, simply identifying one potential fuel source underlies a fundamental principle of climate accountability known as “leakage.” Any facility using one source will simply push other buyers to other sources. Since climate emissions are global, pushing off buyers to other sources still perpetuates the climate problem. This was the conclusion from the Attorney General’s office in their assessment of the emissions assessment provided by Puget Sound Energy for their liquefied natural gas (LNG) facility in Tacoma.
- A 20-year Global Warming Potential factor more accurately represents the real emissions impact from unburned methane. Most methane falls out of the atmosphere after 12 years. Using the 100-year standard has the effect of greatly understating the emissions impact.
- A full accounting of the lifecycle emissions needs to be assessed. This includes but is not limited to emissions from drilling, fracking, extraction, processing the gas, energy used to transport the gas, leaks in the pipeline transmission and distribution systems, leaking when being stored in underground or above-ground facilities, subsequent transport, and emissions loss at the end-use facility.

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We recommend the UTC refer to the extensive comments provided for both the Kalama methanol refinery and the Tacoma LNG facility. In particular, we recommend review of the comments provided by the Stockholm Environment Institute.

#### Question 10

Yes, language requiring electric companies to report on greenhouse gas emissions occurring during the gathering of fuel for electricity generators should be included. We do not know how the UTC would be able to be accountable for the full impact of natural gas use unless these upstream emissions are accounted for. It is now clear that the State of Washington is demanding this accounting as we are seeing in the case of the proposed methanol facility in Kalama and the LNG facility in Tacoma. In addition, we note that Puget Sound Energy is also beginning to provide this upstream assessment for gas emissions in its current 2019 Integrated Resource Plan. Not including these upstream emissions would be a step backward.

Thank you for your consideration of these comments.