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September 11, 2020

To: Utilities and Transportation Commission (UTC) Records Center, records@utc.wa.gov
From: Vashon Climate Action Group
Regarding: Notice of opportunity to file written comments, Docket UE-190698 and UE-191023

The Vashon Climate Action Group (VCAG) welcomes the opportunity to provide written inputs, enclosed, regarding the Electric Integrated Resource plan (IRP) rulemaking docket UE-190698 and the Clean Energy Implementation Plan (CEIP) rulemaking docket UE-191023. Two VCAG members are part of the 2019 Puget Sound Energy (PSE) Technical Advisory Group (TAG). We participated in the 2017 PSE IRP UTC Hearing and the 2019 PSE IRP planning activity. Our submitted inputs are directly informed by participation in these activities.

The work of the Commission, prompted by the passage this year of the Clean Energy Transformation Act (CETA) is important. Legislative changes, embodied in CETA, have long been called for by PSE TAG members. We look forward to supporting the rulemaking process to assure the intent of CETA are clearly established in the Washington Administrative Code.

Please do not hesitate to contact me with questions should they arise. We look forward to participating in hearings and other proceedings to support CETA rulemaking.

Kevin Jones

Vashon Climate Action Group board member
BSEE, University of Washington
206-463-1766
Kevinjonvash@gmail.com

Topic: Reporting of Upstream Emissions

This input is pursuant to effective implementation of WAC 480-100-620 Content of an Integrated Resource Plan, Section (11) Clean Energy Action Plan (CEAP), Subpart (j) Incorporate the social cost of greenhouse gas emissions as a cost adder as specified in RCW 19.280.030(3).

For social cost of greenhouse gas emissions to be effectively incorporated in the IRP process, it is necessary that emission assumptions be explicitly documented and made available for stakeholder review. Upstream emissions represent an important cost component of greenhouse gas emissions. For example, Alvarez, et al. in a recent robust metastudy of upstream emissions from the US oil and gas industry found that accounting for upstream methane leakage nearly doubled the climate impact of natural gas usage, and hence social costs, over policy-relevant time frames.¹

¹ Ramón A. Alvarez, et al.; Assessment of methane emissions from the U.S. oil and gas supply chain, Science 13 Jul 2018: Vol. 361, Issue 6398, pp. 186-188; DOI: 10.1126/science.aar7204; <https://science.sciencemag.org/content/361/6398/186/tab-pdf>

In past IRP processes, certain utilities have been unwilling to share details of their upstream natural gas leakage rate assumptions and subject them to comparison with up-to-date science.²

Given the potential for significant components of the social cost of greenhouse gases to be inaccurately represented, we ask that appropriate wording be added to WAC 480-100-620. We propose the following language, which could, perhaps, be best placed immediately following current Section (8) Economic, health, and environmental burdens and benefits.

(9) Assumptions related to upstream fossil-fuel greenhouse gas emissions. Reporting must include greenhouse gas emissions directly attributable to the extraction, processing, transport, and distribution of the fossil fuel, including emissions attributable to process energy and parasitic loads. Reporting must also include methane leakage values, expressed as a percentage of total methane delivered, for each phase of the natural-gas life-cycle, including but not limited to extraction, processing, transport, distribution, and use.

² Memo from Rob Briggs to Irena Netik; Subject: Upstream Gas Assumptions in PSE 2019 IRP; September 18, 2019; Available here: https://oohpseirp.blob.core.windows.net/media/Default/19_Sept_TAG_8/IRP-TAG-Meeting-8_Meeting-Notes-FINAL.pdf. PSE was unresponsive to the request for information on their assumed leakage rate.