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State Of WASH.  
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**Sent:** Monday, November 4, 2019 8:23 AM  
**To:** Rector, Andrew (UTC) <andrew.rector@utc.wa.gov>  
**Subject:** Comment on Docket UE-190652

As it pertains to the Rulemaking for the Energy Independence Act:

I think it is extremely important for us to recognize and measure the levels of upstream leaks and emissions that occur from the transportation of energy sources such as Natural Gas.

I believe these emissions should be measured and accounted for across a time-span of 12 years, primarily because the the severe short term consequences of methane as it contributes to global warming.

This law should be flexible in accounting for the true leakage rate of methane in production and distribution. Currently the EPA considers this to be roughly 2.4%, however we are beginning to see more studies revealed that show these leakage rates are often underestimated, and it is much more likely that these estimates will begin to rise as we study and learn more about methane leaks. Thus we should be able to properly adjust estimates as more studies come out and give us more knowledge about the extent to which leakages occur.

Finally the relevant Washington Administrative Code should absolutely include language that requires electric companies to report on greenhouse gas emissions that occur "during the gathering of fuel for electricity generators". This is so we can be sure to account for the upstream potential for upstream methane leakages

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Trenton Miller, 11/4/2019