



July 22, 2020

TO: Commission Staff  
WA Utilities and Transportation Commission

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FROM: Dan Kirschner, Executive Director  
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RE: **Tracking and verification of renewable natural gas environmental attributes**

The NWGA proposes the following for the Commission's consideration regarding the accounting, tracking, and recordkeeping requirements and processes for renewable natural gas and its environmental attributes.

1. Each natural gas utility must use Renewable Thermal Certificates (RTCs) to track the chain of custody of the environmental attributes of renewable natural gas (RNG) that is produced or purchased for retail natural gas customers in Washington State under the authority granted in sections 13 and 14 of E3SHB 1257 (Chapter 285, Laws of 2019).
2. RTCs used for compliance with these rules must be issued, monitored, accounted for, and transferred by or through the Midwest Renewable Energy Tracking System (M-RETS) or a Commission approved alternative.
3. All entities that generate, acquire, purchase, sell, transfer, or broker the trade of RTCs for eventual use by a natural gas utility must register and maintain accounts in good standing with M-RETS or the Commission approved alternative.
4. A natural gas utility may not use RTCs under these rules that are issued by, acquired from, or transferred by an entity that has not complied with all information, data reporting and verification requirements of the authorized tracking system, including payment of registration and transaction costs.
5. Upon the Commission's request, each natural gas utility must provide documentation to demonstrate that, for each RTC the natural gas utility purchased or otherwise acquired, one dekatherm of RNG was delivered to an injection point on a natural gas common carrier pipeline.
6. A natural gas utility must retire one RTC for each dekatherm of RNG delivered to its retail customers.

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