

# Avista Utilities

See attached.

*Sent via public comment portal at Ecology.wa.gov*

October 14, 2020

Bill Drumheller  
Air Quality Program, Department of Ecology  
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**RE: Avista comment on the new proposed rule, Chapter 173-444 WAC – Clean Energy Transformation Rule.**

Mr. Drumheller:

Avista appreciates the opportunity to provide comments to the Washington Department of Ecology as part of the Clean Energy Transformation Act (CETA) rulemaking process. The comments and requested clarifications here concern the section at **WAC 173-444-040, Greenhouse gas content calculation.**

**Timing of GHG content calculations using the EPA methodology.**

Emissions reporting as proposed in WAC 173-444-040(2)(b), states that if EPA “has not yet published emissions values for the calendar year in the calculation, use the most recent five year rolling average published emissions values.” This is in lieu of the actual reported emissions for a specific year. Not all generating facilities currently reporting GHG emissions to the EPA have a five-year record of doing so. Please revise this section of the proposed rule to cover this specific situation, or preferably, extend the Ecology reporting deadline to Q4 of each year so that utilities can use actual emission data that has been properly validated and released by the EPA.

**Calculation methodology for electrical power generation facilities using biomass as a fuel.**

The treatment of biogenic CO<sub>2</sub> in WAC 173-444-040 (2)(b) states that “...The total must include all reported GHGs, including biogenic CO<sub>2</sub>, listed in Table A-1 of WAC 173-441-040 converted into CO<sub>2</sub>e as specified in that section”. Section 173-444-040 (2)(g)(iii) states to only use the EPA methodology if ...” Published EPA GHG emissions for the power plant must not include any biomass energy”. Could you confirm which of the GHG calculation methods listed in the proposed rule would be used for electrical power generation facilities using biomass as a primary fuel?

## **Calculation methodology for purchased power from known sources.**

Avista also purchases large amounts of electric power for resale. Usually, these purchases represent a fraction of the total annual output of the generating source. Although EIA data is typically available for these sources, additional clarity in WAC 173-444-040 (3), EIA Methodology, would be helpful when calculating the GHG content of electric power purchased from these sources. Clarification for applying the transmission line loss factor for these sources would also be helpful.

Avista appreciates the opportunity to comment on this proposed rule and we look forward to participating in further discussions on these topics. Please direct any questions regarding these comments to me at 509-495-4738 or [kevin.booth@avistacorp.com](mailto:kevin.booth@avistacorp.com).

Sincerely,



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