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The bulk of my comments are concerned with the issue of reporting the gas leaks from natural gas pipelines, which are mostly methane. A recent Scientific American article (Storrow, Methane Leaks Erase Some of the Climate Benefits of Natural Gas, Scientific American, May 5, 2020, available at <https://www.scientificamerican.com/article/methane-leaks-erase-some-of-the-climate-benefits-of-natural-gas/>) points out that these leaks erase some or most of the benefit of transitioning from coal to natural gas for electricity production. Thus, it is very important that this significant source of methane emissions from entities covered by the Climate Commitment Act be part of the reporting requirements of these covered entities.

The draft amendment of WAC 173-441 states that owners or operators of (1) facilities that emit greenhouse gases, (2) certain suppliers, and (3) electric power entities can have reporting requirements. The "suppliers" include, e.g., operators of interstate or intrastate pipelines delivering natural gas. WAC 173 441 122 (1)(a)(iv) and (vii). Although suppliers of natural gas must "separately report the CO₂, CO₂ from biomass-derived fuels, CH₄, N₂O, and CO_{2e} emissions from the complete combustion or oxidation of the annual volume of natural gas delivered, sold or imported in Washington," (WAC 173 441 122(4)(a)), the draft amended rule does not specify whether and how to measure greenhouse gas emissions, which are mostly methane, due to leakage from natural gas pipelines.

The federal rule that relates to greenhouse gas emission reporting requirements for owners and operators of natural gas pipelines does specify that owners or operators of natural gas pipelines must report leakage from pipelines and gives some detail on what this involves. 40 CFR 98, subpart W.

Possibly one solution to this problem in the draft amended WAC 173 441 would be for owners and/or operators of natural gas pipelines to be specified as a fourth subtype of entities subject to reporting requirements along the lines described in 40 CFR 98, subpart W. Perhaps the Department of Ecology has a better solution. I would be anxious to hear what their solution would be.

Finally, I noticed that the draft amendment of WAC 173 441 contained some confusing statements concerning whether it was the "suppliers" and the "electric power entities" that had reporting duties (as stated in WAC 173 441 110) or the owners or operators of the "suppliers" and "electric power entities" who had the duties (as stated in, e.g., WAC 173 441 124). These definitions should be tightened up and used uniformly throughout the rule.