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I am quite concerned about leakage of methane-- a very potent GHG-- from pipelines and compressor stations. 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 existing Ecology GHG reporting rule clearly classifies interstate and intrastate pipelines as facilities that must report all emissions and assign the correct global warming potential (GWP) to the individual gases, properly handling fugitive emissions. Local distribution networks are calculated in terms of their delivery, assuming complete combustion of the handled gases. Unfortunately, the proposed amendments to the current rule, as currently proposed, create confusion over how emissions from interstate and intrastate pipelines are reported. The definitions in 173-020(1)(i)(iii)(A) and (D) state that interstate and intrastate pipeline operators and local distribution companies are "Fuel supplier"(s) and are pointed to section 122 for further details. This leads to concern that fugitive emissions from pipelines will not be reported as they will not be considered "facilities".

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.

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.