

Arvia Morris

To whom it may concern,

I have been studying the rule making for WAC-173-441. I am a citizen concerned about climate change and wanting the Climate Commitment Act to be effective in bringing down Washington state GHG emissions. I found the rule making for WAC-173-441 difficult to follow. As the public is being asked to comment on the rules I believe they should be presented in a way that we can make sense of the logic of the rules.

Specifically it is hard to follow what is considered a "facility", a "supplier" and a "electric power entity". This is important as different formulas are applied to each type of entity for calculating GHG emissions. Even more importantly, sometimes the emissions include gas leaks and sometimes they do not depending on how an entity is classified. These distinctions would be greatly illuminated if a flow chart were available on the web site or as part of the rule document.

For example the flow chart could include pipelines flowing into Washington or originating in Washington which go directly to local distributors, electrical facilities or plants that manufacture a product. It seems that depending on where the fuels end up will determine whether or not the pipelines are counted as a facility or a supplier. This is a key point as the way emissions are calculated is different depending on if they are considered a facility or a supplier.

It is also not clear which definitions apply when. There are the EPA definitions and there are Washington definitions. There is a desire to align everything with CCA. Is CCA aligned with the EPA definitions? A flow chart would be very helpful for understanding how this reporting and tracking system will work. Having a model for the tracking system with all possible combinations of entities and at which nodes in the model different rules apply would make everything very clear. Having a flow chart which shows inputs and outputs with a list of the rules and definitions that apply at each node will bring clarity and enable rapid implementation of the rule.

A flow chart of this type will also help determine if there are any inconsistencies in the definitions as described in the rules. For example the pipelines seem to be suppliers sometimes and facilities at others. There must be absolute clarity here as accounting and reporting is different for suppliers vs. facilities.

One does not want to double count emissions, have confusion about who is responsible for emissions, or how the emissions are calculated under the CCA. All confusion will result in delay in applying the rule. A flow chart of this complex system will also help determine if leaked gas emissions are or are not being counted in some places. Ideally leaked gas will be counted through out.

Thank you for considering my view.