

Northwest Pipeline

Williams Northwest Pipeline, an interstate natural gas transmission pipeline company whose system extends from the San Juan Basin in northwestern New Mexico to the Canadian border in Washington, respectfully offers these comments and questions regarding Washington's proposed rulemaking for Chapter 173-446 WAC, Climate Commitment Act Program. Williams Northwest Pipeline is considered a "supplier of natural gas" under the proposed rule.

1. The covered emissions calculation and reporting obligation for interstate pipelines in the draft rule is unclear. Covered emissions calculation methodology for suppliers in WAC 173-446-040 references the reportable GHG emission calculation methodology under WAC 173-441-122. This methodology is based on EPA GHG Reporting Program 40 CFR Part 98 Subpart NN for NGL fractionators and local natural gas distribution companies. The volume balance calculation approach in WAC 173-441-122 (4)(b)(viii) adopted from Subpart NN does not include inputs nor specific methodologies for interstate pipelines. Additionally, the reporting requirements for interstate pipelines under 173-441-122 (4)(d) only require interstate pipeline operators to report deliveries to "each customer." Is the intention of the draft rule for interstate pipelines to only report natural gas delivered in Washington as covered emissions?

2. Williams is concerned that total program baseline emissions as determined under WAC 173-446-200 and allocation of baselines for suppliers of natural gas under WAC 173-446-240 have not considered covered emissions from interstate pipelines. As conversations with Ecology regarding interstate pipeline emissions began after the proposed reporting deadline of March 31, 2022, Williams requests the reporting deadline be extended so that emissions from interstate pipelines can be further evaluated by Williams and Ecology for inclusion in the program baseline.

3. Allocation of no cost allowances to suppliers of natural gas in WAC 173-446-240 appears to only apply to "natural gas utilities". Are interstate pipelines intentionally excluded from no cost allowance allocations in the draft rule?