

TC Energy
201 West North River Drive
Suite 505
Spokane, WA, 99201



July 15, 2022

Joshua Grice
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Grice:

I write today on behalf of TC Energy regarding the Climate Commitment Act cap & invest program rules proposed by the Washington Department of Ecology (DOE). TC Energy is one of North America's leading energy infrastructure companies, with operations in the natural gas, oil, and power industries. Our assets include many interstate natural gas pipelines, including the Gas Transmission Northwest (GTN) pipeline, which enters the U.S. in Boundary County, Idaho and runs more than 1,300 miles the Oregon/California border near Klamath Falls. GTN runs through four eastern and central Washington counties and includes three compressor stations. GTN currently reports greenhouse gas emissions data for all of these stations to DOE.

After reviewing the draft rules, we would like to raise the following points of concern:

- The status of interstate pipelines is vague under the definitions included in the rules: "suppliers of natural gas" and "natural gas utility" seem to be used interchangeably within the context of the section. Additional clarity would be helpful here.
- It has been our understanding that the point of regulation under this program would rest with the end user (natural gas utilities, industrial users etc.) We would like to confirm that the rules reflect this outcome, and a more thorough explanation of DOE's plans around reporting gas deliveries would be a welcome addition to these rules.
- Given the uncertainty of the definition of "suppliers of natural gas" and "natural gas utilities", we feel additional clarity is needed around whether interstate pipelines are eligible for no cost carbon allowances.
- Additional clarity on reporting requirements and how those reports are used to calculate emissions liability for interstate pipelines would be welcome. Only including Washington deliveries in covered emission calculations could be one way to begin to address this concern.

It is our understanding that Williams Northwest Pipeline has submitted similar comments around these concerns. We would welcome additional collaboration between DOE and the interstate pipeline companies serving Washington as the draft rule is finalized.

Sincerely,

Michael Hatchett
Manager, State Government & Community Relations