

# Northwest Gas Association

Yeah, hi, this is Dan Kirshner. I'm the executive director of the Northwest Gas Association. I think it's important to note that I don't represent, as you noted introduction, this broader group, that a very specific part of the group, and that is the natural gas utilities and pipelines that serve this region. The forty five thousand miles of installed energy delivery infrastructure in Washington state. So that's my, the perspective that I'm representing here today. And first, I just want to say, thanks Bill. That was a terrific presentation. Very thorough. I think you're asking great questions and you're, Ecology is being very thoughtful as it moves forward in this process and we, too, thank you for the opportunity to provide at least cursory comments at this point, and perhaps more robust comments as the process moves along.

So, thank you for the opportunity. I think it's really important to, as Ecology moves down this pathway, the GAP rulemaking moves down this pathway, that one principle it includes is in any environmental assessment, especially the lifecycle analyses that the metrics they're using are used consistently and sourced from credible sources. And in this case, I would suggest a credible source is a government agency that has charge for regulatory oversight over the, the issues at hand.

So, I'm speaking and thinking, particularly of upstream emissions from, from perhaps natural gas production and the like, and as an example of a credible source that I would call a, a government agency would be, for instance, in the US, the EPA inventory of greenhouse gas emissions. And (inaudible), Canada's version of the same if to go outside of Washington state boundaries in that regard.

So they also need to be consistently applied. And, I mean, that regard, I'd say if you're gonna do a lifecycle analysis of any fuel that you that a life cycle analysis should be done for all fuels involved in in the project. So, as you're thinking about, it's very easy to do a life cycle analysis for natural gas, for instance, but perhaps renewable energies are also are not a zero carbon, fuel lifecycle wise.

They are zero carbon at the point of generation, but they're not zero carbon overall and so consistent application of the life cycle analysis be very important part of this process.

I would also say, I appreciate the fact that the governor's executive order requires or calls for providing a twenty year and a hundred year assessment of global warming potential. Our hope would be that that assessment is provided without value or direction--just simply provided as an input to the process and something to consider and compare, but that when comparisons are made, they're made appropriately.

And I especially appreciate, Bill, your calling out the, AR5, comments AR5 of the IPCC about it being a value judgment which direction you go in the in the use of those.

I think it's also important to understand as you're conducting lifecycle analysis, that any lifecycle analysis can't really be generalize broadly. It really, in the Northwest, we have distinctives here in the Northwest and that's particularly true of the natural gas delivery systems as well, as natural gas production, where we receive about 70% of our supply in the Northwest comes from British Columbia, which has probably the most robust regulatory construct around natural gas production in

North America. And so it's