

Sierra Club

This is Doug Howell with the Sierra Club. Thank you so much for holding this meeting today. I think it's incredibly important and I applaud you in your efforts, and just to give an example of why this is so important, we have found in some of the calculations that we have done, if you look at some of the upstream emissions of methane associated with gas and use the most recent science, and other important criteria, that there are cases and it may be standard where you're nearly doubling your profile from the smokestack, so really important here and I wanted to narrow my comments about the threshold that we've heard before what defines major and we have a recommendation for that. We already have a ten thousand ton reporting requirement in law and anytime you have a previous existing statute in law you really, really you don't have to go through as much of a justification process again for where you're setting that threshold.

But I also want to share with you another bit of analysis we had done as just an example of what this threshold could be important. We did an assessment of Puget Sound Energy's...did a review of potential new gas plants that they were considering. The smaller ones are the peaker plants at about fifty megawatts and running at the capacity factors that they had looked at for these small plants and it was very interesting to see that a small peaker plant that they're considering investing in as a potential new investment is right around the threshold of ten thousand tons and we really would want to make sure that we're capturing these new gas plants. So, I offer as a recommendation, as a starting point, it looks is to have a very strong rationale to use a ten thousand ton threshold for your definition of major projects. Thank you so much for holding this.