

Greenhouse Gas Reporting Protocols

Consumer-owned Utilities

Instructions for reporting greenhouse gas emissions to DEQ

Overview

Certain consumer-owned utilities are required to report greenhouse gas emissions to DEQ. This document describes the types of utilities required to report, reporting deadlines and the processes utilities must use to calculate and report their greenhouse gas emissions.

Applicability

All consumer-owned utilities that import, sell, allocate or distribute electricity to end users in Oregon are subject to Oregon's greenhouse gas reporting rules (OAR Chapter 340 Division 215). However, as described below, the third party reporting provision will allow entities like BPA and PNGC to report for a majority of Oregon's consumer-owned utilities, thereby significantly reducing the number of utilities that must report to DEQ.

Reporting Deadlines

The reporting deadline is June 1st following the emissions year.

Reporting Protocols

Oregon rules require consumer-owned utilities to register and report greenhouse gas emissions and to provide supplemental information regarding electricity generated at facilities they own or operate, electricity purchased from the Bonneville Power Administration and electricity purchased from other sellers. Utilities must only report on electricity distributed to end users in Oregon.

Utilities must report using DEQ's forms and the processes described below. In instances where third party entities are allowed to report on behalf of consumer-owned utilities the third party reporting provision described below must be utilized.

Reporting form: Utilities reporting for themselves (i.e. those that do not have a third party reporting for them) must use the greenhouse gas reporting form for consumer-owned utilities provided on DEQ's webpage.

Emissions from electricity generated by the utility: Oregon rules require consumer-owned utilities to report the megawatt-hours of electricity distributed to end users in Oregon that were generated from facilities owned or operated by the utilities. Oregon rules also require these utilities to report the greenhouse gas emissions from the generation of this electricity.

For facilities owned and operated by the utility the following must be reported:

- The name, location, and generating fuel type of facilities owned or operated by the reporting company that provided electricity to end users in Oregon.
- The megawatt-hours (MWh) distributed to end users in Oregon from each specified facility.
- If known, utilities must report facility specific anthropogenic and biogenic emission factors. If these emission factors are unknown the utility must calculate emissions from this electricity using the methodologies and emission factors in the federal greenhouse gas reporting rules. Specifically, DEQ is proposing that utilities use 40 C.F.R. Part 98 Subpart C, finalized by the U.S. Environmental Protection Agency Nov. 29, 2013.
- Utilities must use a 2 percent transmission loss correction factor when determining emission factors and reporting electricity not measured at the busbar of the generating



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facility. Utilities enter the required information in worksheet 1, titled “Generated electricity” of the reporting form.

Emissions from electricity purchased from BPA: Oregon rules require consumer-owned utilities to report the megawatt-hours of electricity purchased from the Bonneville Power Administration (BPA).

- Utilities do not need to calculate or report emissions for electricity purchases from BPA; DEQ will calculate emissions based on additional information supplied to DEQ by BPA.
- Utilities enter total megawatt-hours purchased from BPA and distributed to end users in Oregon in worksheet 2 of the reporting form.

Emissions from electricity purchased from sellers other than BPA: Oregon rules require consumer-owned utilities to report the megawatt-hours of electricity purchased from sellers other than BPA, including information, if known, on the seller of the electricity, the location of the facility, the original generating fuel type or types, and facility specific emission factors.

For purchased electricity utilities must report:

- The generating fuel type and if known, the name and location of the facilities that generated power purchased by the utility and distributed to end users in Oregon.
- The megawatt-hours (MWh) distributed to end users in Oregon from the specified facility.
- If known, utilities must report facility specific anthropogenic and biogenic emission factors from purchased electricity. If the generating fuel type is known but facility specific emission factors are unknown the utility must calculate emissions from the facility utilizing 40 C.F.R. Part 98 Subpart C, finalized by the U.S. Environmental Protection Agency Nov. 29, 2013 and may utilize average heat rate data published by the Energy Information Agency (EIA). Purchases for which the generating fuel type is unspecified must be reported on worksheet 4, titled “Unknown”, of the reporting form.

EIA only publishes national average heat rates for coal and natural gas. DEQ has provided default emission factors for coal and natural gas on the “Fuel Lookup” worksheet of the reporting form for consumer-owned utilities. Companies do not need to report greenhouse gas emissions for purchases of electricity generated by other known fuel types when facility specific emission factors are unknown. For purchases of electricity generated by a known fuel type that is not coal or natural gas, companies only need to report megawatt hours provided in Oregon, the generating fuel type, and known identifying information on the seller.

- Utilities must use a 2 percent transmission loss correction factor when determining emission factors and reporting electricity not measured at the busbar of the generating facility. Utilities enter the required information in worksheet 3 of the form.

Emissions from unspecified purchases: Utilities must report the megawatt-hours provided to end users in Oregon from unspecified generating sources.

- Utilities do not need to calculate or report GHG emissions for electricity purchases from unspecified sources; DEQ will calculate emissions based on additional information.
- Utilities enter the required information in worksheet 4 titled “Unknown” of the reporting form.

Third Party Reporting

Oregon rules authorize a third party to report on behalf of a consumer-owned utility, and the report may include information for more than one utility, provided that the third party's report includes all the information required by DEQ for each individual utility.

- BPA is expected to report as a third party for utilities with service areas entirely within Oregon and that receive all their electricity from BPA.
- PNGC is expected to report as a third party for all utilities that are a member of PNGC and that provide electricity to Oregonians. PNGC should use the PNGC-specific form provided on DEQ's webpage.
- BPA and PNGC are the only entities DEQ has identified that might report as a third party. DEQ requests that any other third parties that want to report for a consumer-owned utility contact the program.

Supplemental Documentation

Utilities must provide supplemental documentation to show how emission factors were calculated for electricity generated at facilities owned or operated by the utilities and to provide information about sellers of electricity purchased by the utilities. More information on required supplemental documentation is provided in the reporting forms. Supplemental documentation can be emailed along with the annual report or mailed in along with the required registration document at the time of submittal.

Report Submittal

Email an electronic Excel copy of the completed report (not a PDF copy) to GHGreport@deq.state.or.us. In addition, mail the completed report with the signature of the person certifying the report to:

Greenhouse Gas Reporting Program
700 NE Multnomah St., Suite 600
Portland, OR 97232

Additional Reporting Requirements

Persons required to report should review the greenhouse gas reporting rules in OAR Chapter 340 Division 215 to identify additional elements of the reporting program such as recordkeeping requirements. Each utility must retain records of all information used to calculate and report emissions, including inputs to equations, in a manner that is suitable for inspection and review.

Please visit DEQ's website for the latest information regarding greenhouse gas reporting from consumer-owned utilities, such as updates to the reporting protocols and reporting forms.

Contact Information

Contact Elizabeth Elbel at 503-229-6476 or elbel.elizabeth@deq.state.or.us

Accessibility

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us.