



State of Oregon
Department of
Environmental
Quality

Natural gas suppliers

Instructions for reporting greenhouse gas emissions to DEQ

Overview

Certain natural gas suppliers are required to report greenhouse gas emissions to DEQ pursuant to OAR 340-215. The protocols describe the types of suppliers required to report, the methodologies and forms required and the deadline for reporting. Entities subject to reporting should review Oregon's greenhouse gas reporting rules for additional elements of the reporting program, such as recordkeeping requirements.

Applicability

Natural gas suppliers include any person or company that imports, sells or distributes natural gas to end users in the state. To fully account for and verify the total volume of natural gas imported and distributed to end users in Oregon while limiting the reporting burden to the sector, DEQ requires reporting from specific supplier categories listed below. In all instances when natural gas is delivered by pipeline the entity operating the distribution pipeline that physically delivers gas to end-users in Oregon must report the volume of gas delivered.

Supplier categories for reporting:

Local Distribution Company (LDC): A legal entity, including natural gas utilities, engaged in the retail sale and/or delivery of natural gas through a distribution system that they own or operate and that physically delivers gas to end users in Oregon.

Interstate pipelines: An interstate pipeline is an entity that owns or operates a pipeline that delivers natural gas to Oregon across the state border. An interstate pipeline is not considered an LDC.

Importers of natural gas: For reporting purposes, this category includes any entity that imports natural gas into Oregon, by any means other than a pipeline distribution system. This category includes, but is not limited to, gas imported into the state by rail or truck.

Reporting protocols

Local Distribution Company (LDC): An LDC must annually submit to DEQ a full and complete copy, including any supporting documentation, of their annual EPA Greenhouse Gas Report filed for compliance with 40 CFR Part 98 Subpart NN – Suppliers of Natural Gas and Natural Gas Liquids.

Interstate pipelines: Operators of interstate pipelines must annually report and submit the total volume of gas delivered to end-users in Oregon and identifying information for all large end-users in Oregon.

- A large end-user is any entity in Oregon registering a supply equal to or greater than 460,000 thousand standard cubic feet (Mscf) during the reporting year.
- Identifying information must include the company name and facility address.

Greenhouse Gas Reporting Program
700 NE Multnomah St., Suite 600
Portland, OR 97232
Phone: 503-229-5696
800-452-4011
Fax: 503-229-6762
Contact: Elizabeth Elbel
www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

To prevent double counting interstate pipelines should not report volumes of gas delivered to an Oregon LDC or intrastate pipeline. Operators must report using DEQ's reporting form for interstate pipelines.

Importers of natural gas: Natural gas importers must report the total annual volume of natural gas, compressed natural gas and liquefied natural gas imported into Oregon for use in the state on DEQ's forms. The form requires that an importer report volumes in thousand standard cubic feet (Mscf).

Reporting renewable natural gas (RNG):

Entities supplying renewable natural gas (RNG) may voluntarily report the volume of renewable natural gas distributed to end users in Oregon. Entities reporting RNG must first complete and submit reports described in the reporting protocols for natural gas suppliers above. In addition, these entities may separately report RNG on DEQ approved forms and must submit supporting documentation that authenticates the purchase of RNG.

Renewable natural gas (RNG) or biomethane: Renewable natural gas (RNG) or biomethane is refined biogas that has been upgraded to pipeline-quality gas and is interchangeable with conventional natural gas.

Documentation: Entities reporting RNG must provide documentation that authenticates the purchase of RNG between parties. This may include bills of lading, invoices, or contracts confirming the source of RNG supplied to end users in Oregon.

Reporting deadlines:

Natural gas suppliers must report annually by March 31st following the previous calendar year.

Reporting and forms:

Reporting forms and protocols are available on DEQ's Greenhouse Gas Reporting webpage. All documents must be submitted to DEQ electronically at GHGReport@deq.state.or.us. Signed forms must be mailed to:

Oregon Department of Environmental Quality
Attn: GHG Reporting Program
700 NE Multnomah St, Ste 600
Portland, Oregon 97232-4100

Submission of sensitive business information:

Data collected under the program must be made available to the public unless submitted information qualifies for confidential treatment under Oregon's Public Records Law, ORS 192. If an entity subject to reporting believes that information contained in their report may potentially be considered confidential they should not submit reports by email and must contact the program directly for specific instructions on requesting data submission at GHGReport@deq.state.or.us.

Alternative formats

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.