

# Greenhouse Gas Reporting Protocols

## Natural Gas Suppliers

### Instructions for reporting greenhouse gas emissions

#### Overview

Natural gas suppliers and in-state producers must report greenhouse gas emissions resulting from the complete combustion of all natural gas they supply to and within Oregon, as prescribed by [OAR 340-215-0115](#). This document provides additional guidance on reporting requirements for this sector, including what entities are required to submit reports, reporting deadlines, and reporting methodology. Entities required to report should review the greenhouse gas reporting rules to identify additional elements of the reporting program.

#### Applicability

Any entity that produces natural gas, compressed natural gas or liquefied natural gas in Oregon, or who imports, sells, or distributes natural gas to end users in Oregon is subject to Oregon's greenhouse gas reporting rules ([OAR Chapter 340 Division 215](#)). This includes, but is not limited to, in-state natural gas producers, local distribution companies, interstate pipelines and importers of natural gas.

*In-state producers:* Any entity that refines, treats, or otherwise processes biogas into biomethane in Oregon, or is responsible for the production, extraction, recovery, lifting, stabilization, separation or treating of natural gas from natural formations. This segment does not include removal of natural gas from underground storage facilities.

**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 entity that owns or operates a pipeline that delivers natural gas to Oregon across the state border. An interstate pipeline is not considered a local distribution company.

**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 deadlines

The reporting deadline is **March 31** for reporting emissions from the previous calendar year (Jan. 1 to Dec. 31).

**DEADLINE POSTPONED:** To accommodate the transition to our new online reporting system, Your DEQ Online, the reporting deadline for reporting 2020 emissions has been postponed to **Friday, July 16, 2021**.

#### Reporting protocols

All natural gas suppliers and in-state producers must report:

- Total volume of natural gas delivered (Mscf)
- Total energy of natural gas delivered (MMBtu)
- Types of natural gas delivered
- Emissions associated with complete combustion of all delivered natural gas (MT CO<sub>2</sub>e)
- Volume of natural gas delivered to each large end user, including customer information required in 40 C.F.R. 98.406(b)(12)



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[Greenhouse Gas  
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- Identifying information for each natural gas marketer who contracts use of their distribution system and the volume of natural gas transported for each marketer

For the purposes of this reporting, large end users of natural gas are end users receiving equal to or greater than 460,000 scf of natural gas during the year.

LDCs must report greenhouse gas emissions using methodologies described in [40 C.F.R. part 98 subpart NN](#) for suppliers of natural gas and natural gas liquids. A full and complete copy of their annual EPA Greenhouse Gas Report filed for compliance with 40 C.F.R. part 98 subpart NN may be submitted to meet this requirement. All other natural gas suppliers may use calculation methodology 1 as specified in 40 C.F.R. 98.403(a)(1) to report their emissions. CH<sub>4</sub> and N<sub>2</sub>O emissions should also be calculated, using equation C-8 and table C-2 as required in 40 C.F.R. 98.33(c)(1).

To prevent double counting, volumes of natural gas delivered to a local distribution company in Oregon should not be reported. Emissions from natural gas that is exported to users outside of Oregon should also not be reported.

### **Online reporting**

Natural gas suppliers must report and certify emissions data using [Your DEQ Online](#).

A user guide to reporting greenhouse gas emissions as a natural gas supplier is available on the [Greenhouse Gas Reporting Resources and Forms](#) page.

### **Additional requirements**

Natural gas suppliers must separately report volumes and emissions for biomass-derived fuels, including information on the vendor and producing facility.

All new natural gas suppliers must register with the Greenhouse gas Reporting Program in advance of the March 31 reporting deadline by submitting a completed Natural Gas Supplier Registration Form via e-mail to [GHGReport@deq.state.or.us](mailto:GHGReport@deq.state.or.us).

### **Supporting documentation**

If an entity chooses to substitute their own reporter-specific emission factors or high-heating values in place of default values, it must provide DEQ with these values and all information used to develop the reporter-specific emission factor(s) or heating value.

### **Recordkeeping requirements**

Natural gas suppliers must retain DEQ greenhouse gas emission reporting records and any applicable materials as required by EPA's 40 C.F.R part 98 for a period of at least five years. Records retained must be sufficient to document and allow for verification of emissions data reported to DEQ and any later revisions. Note that natural gas suppliers that are subject to the requirements of [OAR 340-272-0120](#) (third party verification) will be required to retain records for at least seven years, beginning with data for the 2021 reporting year. Interstate pipelines are exempt from third party verification requirements.

In addition, records authenticating the purchase of any biomass-derived natural gas and documentation of any exported natural gas must be kept for the minimum five year recordkeeping period.

### **Circumstances under which a source can stop reporting**

Natural gas suppliers that cease to supply natural gas in Oregon are no longer required to report to DEQ if they complete all of the following:



- Submit an emissions report for the year in which they ceased to supply natural gas in Oregon,
- Retain the records required under [OAR 340-215-0042](#) for a period of five years following the last year that they were subject to reporting, and
- Notify DEQ in writing of their reason(s) for ceasing to report no later than the reporting deadline for the applicable year (March 31).

If a regulated entity undergoes a change of ownership or operational control that results in a cessation of their status as a natural gas supplier, the following must be completed to comply with DEQ rule:

- The new owner or operator must notify DEQ in writing of the ownership or operational control change with information as specified in OAR 340-215-0034(3)(a)
- The person who owns or operates the regulated entity at the time of a reporting deadline (March 31) has the responsibility for complying with reporting requirements
- If an ownership change takes place during the year, reported data must not be subdivided for the year. A single annual emissions data report must be submitted by the current owner or operator

### **Accessibility**

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).

