



# Oregon

Kate Brown, Governor

Department of Environmental Quality

Office of Greenhouse Gas Programs

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October 28, 2020

Oregon Public Utility Commission of Oregon (PUC)

Attn: Garrett Martin, Policy Advisor

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Garrett Martin,

Oregon Department of Environmental Quality's (DEQ) greenhouse gas reporting program's primary purpose is to collect, validate and analyze Oregon greenhouse gas emissions data. We compile information to improve our understanding of emissions and to inform greenhouse gas programs and policy decisions.

DEQ is appreciative of the ongoing collaboration with PUC staff. Based on recent conversations with PUC staff we believe that your Integrated Resource Planning (IRP) process could provide additional information that would add value to the work that we do at DEQ to understand and analyze greenhouse gas emissions. As part of future IRP requirements, we would like to propose that PUC consider additional greenhouse gas emissions data requirements for utilities. Specifically, it would be ideal to have utilities provide information on generating resources and associated greenhouse gas emissions in a format that aligns with the way utilities already report emissions through DEQ's greenhouse gas reporting program and with how these emissions are tracked through the state inventory. This entails all GHG emissions associated with generation serving their Oregon retail customers. Based on recent conversations with PUC, we understand this may be different than what utilities' traditionally model in their IRPs, which estimate generation and emissions from their fleet of resources. We would be happy to talk with you more about the details of our reporting requirements, if that would help inform this request.

I also wanted to reiterate our interest in following developments related to PacifiCorp's multi-state process (MSP). Currently, it is our understanding that DEQ's GHG reporting requirements generally align with existing MSP methods attributing resources and costs to PacifiCorp's Oregon customers. Changes to the MSP could inform how the utility would calculate and report greenhouse gas emissions to DEQ in the future.

Thank you for consideration of our comments.

Regards,

Elizabeth Elbel

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