

Greenhouse Gas Reporting Rule Advisory Committee

Initial Interests & Concerns

(August 25 Meeting)

Timeline for Implementation:

- How can we begin reporting in 2010 for 2009 (statutory requirement) - which means implementing data collection systems in January 2009 - when the reporting rule will not be finalized and adopted until Spring 2009?
- Any chance the law could be amended to start reporting in 2011 for year 2010?
- Any chance we can build in some relief/leeway within the rule for 2009 reporting?

Clarity on Who Has to Report/What to Report/De Minimus Levels:

- Focus early on de minimus - get clear on this before drafting the rule.
- Get clear on reporting entities/thresholds.
- Clear definition of "ownership" versus leased/common facilities.
- Clear lines of demarcation: *who* is responsible/included and at what level reporting must be done.
- Get as clear and concrete as possible about what data is needed - don't rely on broad and vague language.
- Clarify as soon as possible in order to prepare and direct those who will be required to report.
- Be clear about the scope of greenhouse gas reporting rule. How will it be linked to cap and trade?

Simplicity/Feasibility:

- Practical de minimus values based on what *must* be reported; avoid unreasonable levels of detail.
- Keep it as simple as possible - so people can understand and implement in a timely way.
- Least burdensome requirements possible: allow for simple/efficient data collection that may rely on "assumptions" - rather than requiring impractical tracking.
- Simplicity is especially crucial for fleets reporting requirements - where detailed vehicle level measurement may be impractical. (Could it be as simple as total gallons of gas/diesel used?)

- Minimize the workload for smaller reporting agencies/entities.
- Come up with a reasonable de minimus for stationary reporting.

Consistency/Accuracy

- Make GHG reporting consistent with other existing and evolving reporting systems - to minimize reporting requirements.
- Consistency across states is important.
- Get in synch with other systems - WCI and any EPA national reporting.
- The goal should be thorough comprehensive rule-making.
- Avoid being too generic. Start with general reporting but identify detail that may later become important.
- 1990 data (for cap) will be very problematic.
- Fugitive emissions - challenge to get a handle on data.

Draw on Experience

- Use the experience of others (like Alberta) to identify and avoid problems.

Implementation Support/Verification

- Provide good information and guidance. Begin communicating early with fleets and others not represented in the reporting rule advisory process.
- Clarify how the State of Washington will report its GHG emissions.
- Identify how we can help "smaller" entities and others to implement and comply with GHG reporting requirements - especially crucial in light of implementation/rule-making schedule.
- Recognize that we won't get it exactly right from the beginning. Allow for lots of learning curve. Provide some leniency for growing and learning from experience.
- "Real" but not overwhelming verification.

Fairness

- Minimize competitive disadvantages when clarifying owner/tenant responsibilities.
- (How) Will we give credit for GHG reductions generated by use of clean fuels, diesel rebuilds, etc,?

- How can ensure accurate measuring/reporting of *GHG* reduction efforts?
- Is there a way to speak to the role of credits for *GHG* reduction efforts - separate from the annual reporting system?