

2023 Climate Rulemaking Advisory Committee Meeting 2

Office of Greenhouse Gas Programs

May 16, 2023

Agenda

Time	Topic
10 a.m.	Welcome and agenda review
10:10 a.m.	Review and discuss potential clarifications for reporting biomethane
11:30 a.m.	Review and discuss verification of reported biomethane
12 p.m.	Lunch
1 p.m.	Public comment period
1:45 p.m.	Review and discuss issues related to hydrogen reporting
2:45 p.m.	Review and discuss updates to proposed Climate Protection Program BAER rules from first RAC meeting
3:15 p.m.	Review and discuss proposed rule changes to Third-Party Verification Program
3:45 p.m.	Additional RAC discussion
3:55 p.m.	Next steps and wrap up
4 p.m.	Adjourn meeting

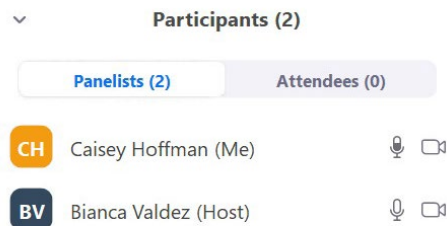
Zoom participation tips

Thank you for joining us today!

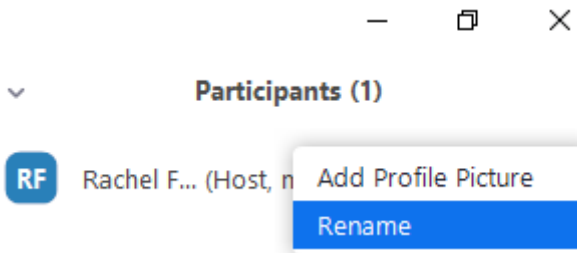
- The meeting is being recorded.
- Please join audio by either phone or computer, not both.
- RAC members join as panelists with audio and video enabled.
- Members of the public have audio and video enabled while giving comment.
- For immediate questions or technical support, please email Climate.2023@DEQ.oregon.gov.

How to rename and add affiliation

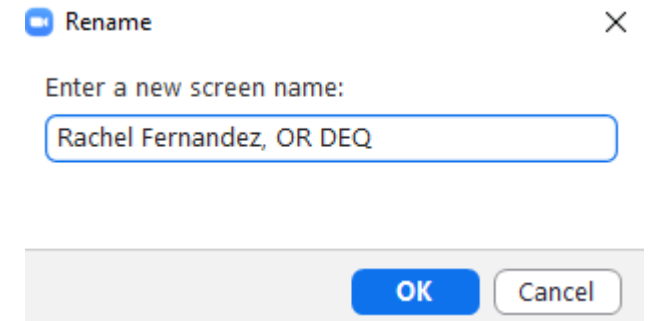
1. Hover on your name in the participation pane.



2. Right click on Rename.



3. Add your name, affiliation, pronouns (if desired)



Office of Greenhouse Gas Program staff

Colin McConnaha

Office Manager

Nicole Singh

Senior Climate Policy Advisor

Elizabeth Elbel

GHG Reporting Program Manager

Bill Brady

Greenhouse Gas Reporting Specialist

Rachel Fernandez

Greenhouse Gas Program Analyst

Liz Hardee

Third Party Verification Specialist

Matt Steele

Climate Policy Analyst

Joe Westersund

Environmental Engineer 3

Climate 2023 Advisory Committee

- Ash Grove Cement Company
- Coalition for Renewable Natural Gas
- Green Energy Institute (Lewis and Clark)
- HF Sinclair
- Northwest & Intermountain Power Producers Coalition
- Northwest Natural
- Oregon Environmental Council
- Oregon Fuels Association
- PacifiCorp
- Renewable Hydrogen Alliance
- Shell Trading US Company
- Space Age
- Trinity Consultants
- Western States Petroleum Association

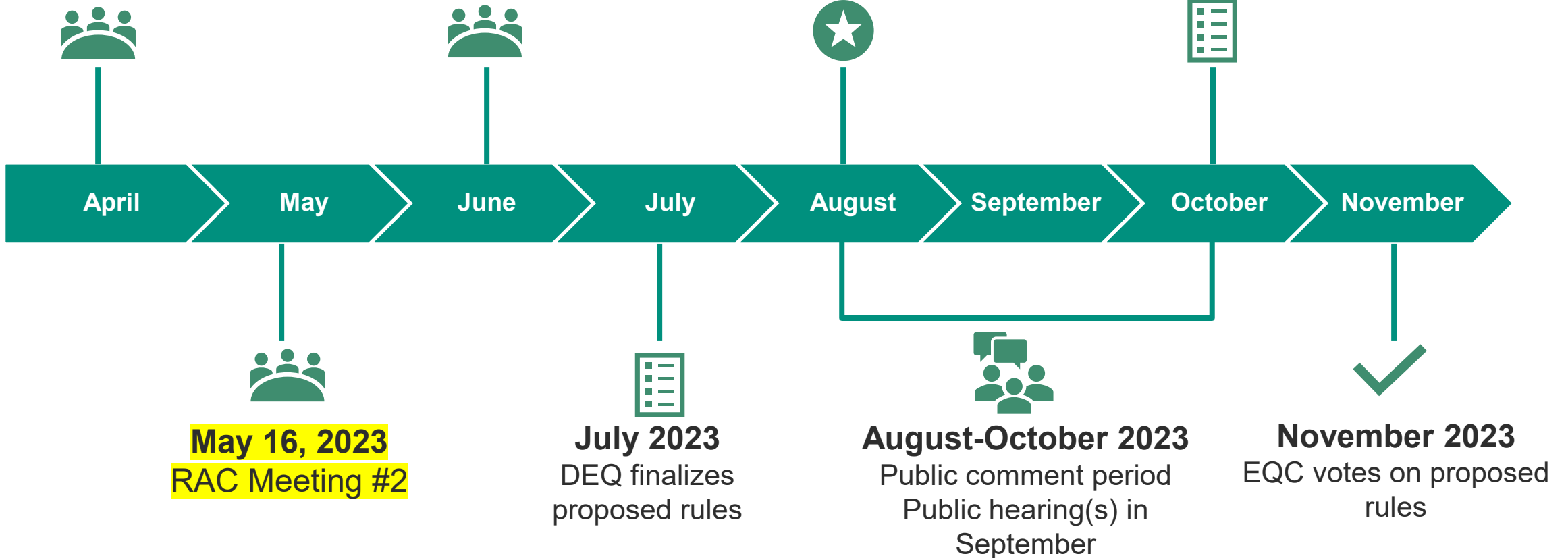
2023 Climate Rulemaking Timeline

April 4, 2023
RAC Meeting #1

June 27, 2023
RAC Meeting #3

August 2023
DEQ publishes Notice of
Proposed Rulemaking

October 2023
DEQ revises proposed
rules



Committee Discussion Guidelines

- Honor the agenda and strive to stay on topic
- Provide a balance of speaking time
- Bring ideas and any concerns up for discussion at the earliest point in the process
- Address issues and questions – focus on substance
- Seek to learn and understand everyone's perspective
- Listen and speak with respect

Public comment and engagement

- Public comment welcome
- Immediately follows lunch break
- Written comments requested by **May 30th**
 - Climate.2023@DEQ.oregon.gov



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Reporting biomethane: Introduction

Item	Biomethane Discussion Outline
1	Goals
2	Background on biomethane
3	Division 215 biomethane reporting overview
4	Basics of book and claim and key terms
5	Examples of book and claim
6	Focused discussion questions
7	RAC discussion time

Reporting biomethane: Goals

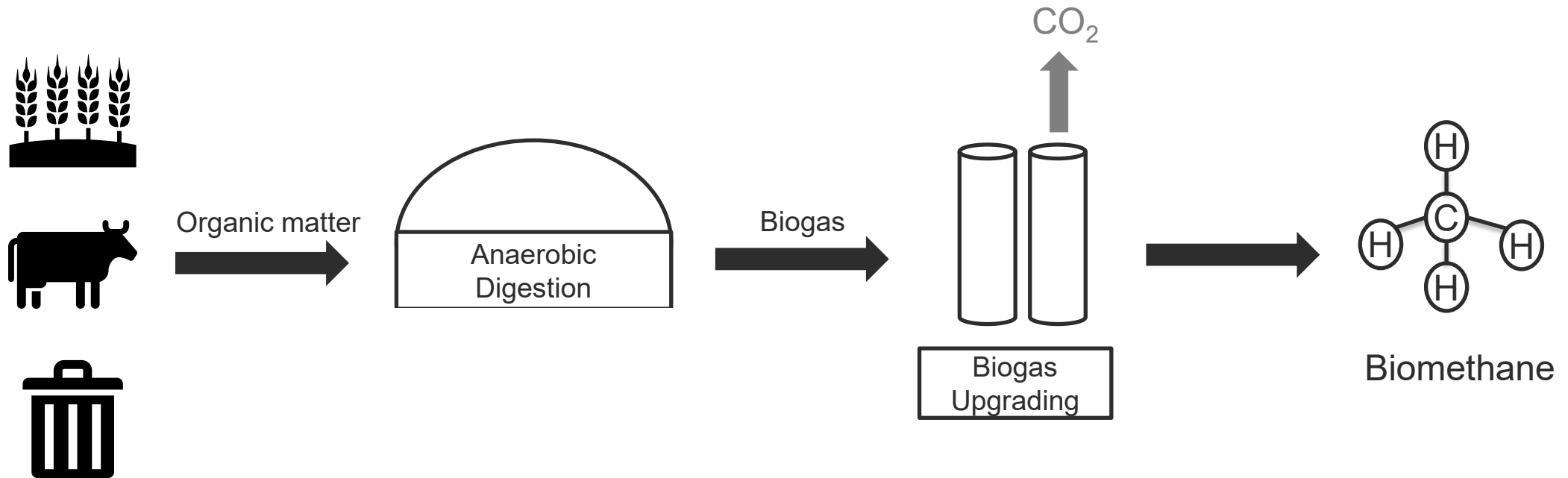
- Provide clear requirements for reporting biomethane
- Maintain data quality and consistency
- Accurately account for Oregon's GHG emissions
- Support implementation of climate programs in Oregon, including the Climate Protection Program
 - GHGRP data used to determine covered emissions and compliance obligations

Biomethane background

- Produced from biomass
 - Landfilled waste
 - Wastewater treatment
 - Animal manure
 - Agricultural residues
- Functionally equivalent to fossil natural gas
 - Able to use in existing natural gas infrastructure
 - Substitute for natural gas for any end use

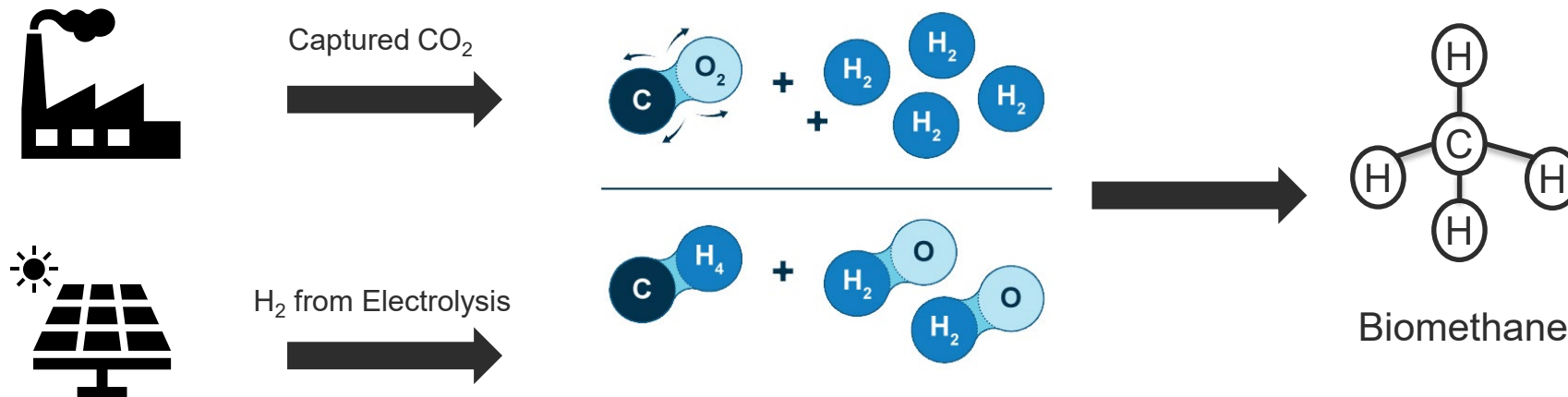
Biomethane production

Biogas upgrading



Biomethane production

Synthetic methane



Clarifying Questions



Division 215: Points of reporting of biomethane

Air Permitted Stationary Sources

- Report on site use of biomethane
- May report production as an in-state producer

Natural Gas Suppliers

- Report pipeline injected biomethane
- Report direct deliveries of biomethane (imports by truck or rail)

In-state producers

- Report direct deliveries of biomethane
- Gas produced in Oregon and injected into a pipeline is reported by an LDC or interstate pipeline supplier

Division 215: Biomethane reporting overview

- Allows for reporting direct deliveries and book and claim accounting of pipeline injected gas
- Requires attestations to avoid multiple claims
- Allows for electronic tracking platforms
- Requires gas to be claimed within the same calendar year it was injected
- Proposes new definitions and modifies existing definitions
- Allows for claims of the same volume of biomethane for the same use under multiple programs, under certain circumstances.

Example: The same biomethane could be claimed for transportation use under Clean Fuels Program and as delivered by LDC.

Division 215: Reporting requirements

Requires certain information to be reported (OAR 340-215-0044):

- Name and address of vendor(s) from which the fuel was purchased
- Quality and quantity of biomethane, based on contractual deliveries
- Feedstock(s), production methods, and production dates
- Point of origin and point of receipt and identification of end user in Oregon, if applicable
- Submission of records demonstrating that no other party can claim the attributes

When using Book and Claim with an electronic tracking system:

- Submission of records demonstrating retirement of renewable thermal credits or claimed environmental attributes

Division 215: Recordkeeping requirements

Requires certain records to be maintained (OAR 340-215-0042):

- Allows for multiple documentation types
- Must be made available for verification to both verifiers and DEQ, as applicable
- Requires documentation of quality and quantity of the gas
- Requires documentation of vintage – pipeline injection must occur within the emissions data year
- Attestations of environmental attributes demonstrating no other party can make claims
- Fuel production process, production facility identification information and feedstock(s)

When using book and claim:

- Requires documentation that fuel was injected into a pipeline system

When using book and claim with an electronic tracking system:

- Retired and claimed thermal credits and environmental attributes

Division 272: Third Party Verification

Third Party Verification of biomethane and hydrogen (OAR-340-272-0470(5))

- Verifiers must review documentation and make reasonable assurance that the entity is contractually receiving and delivering the fuel
- Review documentation of the quantity and quality of fuel
- Review attestations regarding environmental attributes
- Review relevant records from electronic tracking systems

Clarifying Questions



Book and Claim

Chain of custody model to track emissions reductions

- Certificates verify environmental attributes of biomethane that has been produced and added to the supply chain
- Environmental attributes can be traded independently from the physical gas
- Environmental attributes are retired to claim the beneficial use of the original biomethane

Book and Claim

- Consistent with other emission reduction and renewable energy programs, including:
 - Oregon Clean Fuels Program
 - Oregon Public Utility Commission Renewable Natural Gas Rules
 - Washington Clean Fuel Standard, Greenhouse Gas Reporting Program, and Cap and Invest Program
 - California Low Carbon Fuel Standard, Mandatory Reporting Program, and Cap and Trade Program
 - Federal Renewable Fuel Standard
- Verifiable emission reductions with low administration costs
- No additional transportation costs
- Allows local demand to exceed local supply

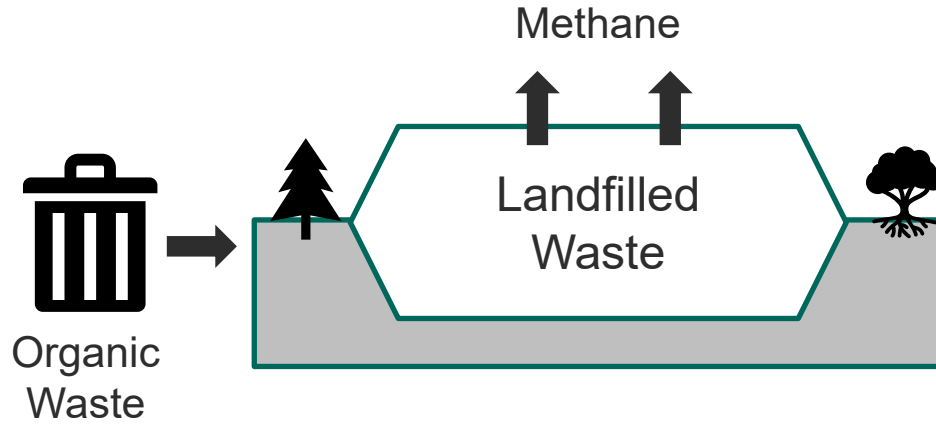
Proposed definition

- **340-215-0020 Definitions**

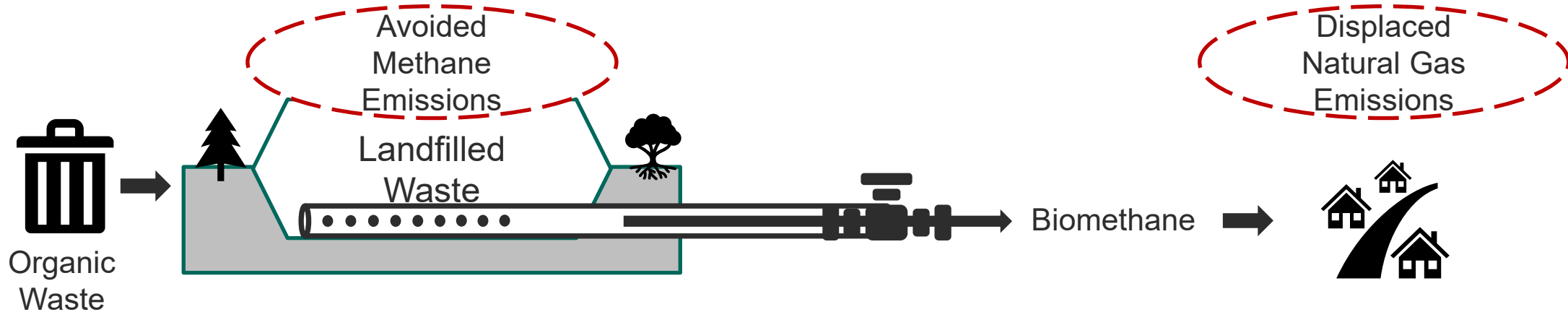
(X) “**Book and Claim**” refers to the accounting methodology where the environmental attributes of an energy source are detached from the physical molecules when they are commingled into a common transportation and distribution system for that form of energy. The detached attributes are then assigned by the owner to the same form and amount of energy when it is used. For the purposes of this division, the common transportation and distribution system must be connected to Oregon.

Biomethane Environmental Attributes

Business As Usual



Biomethane Production

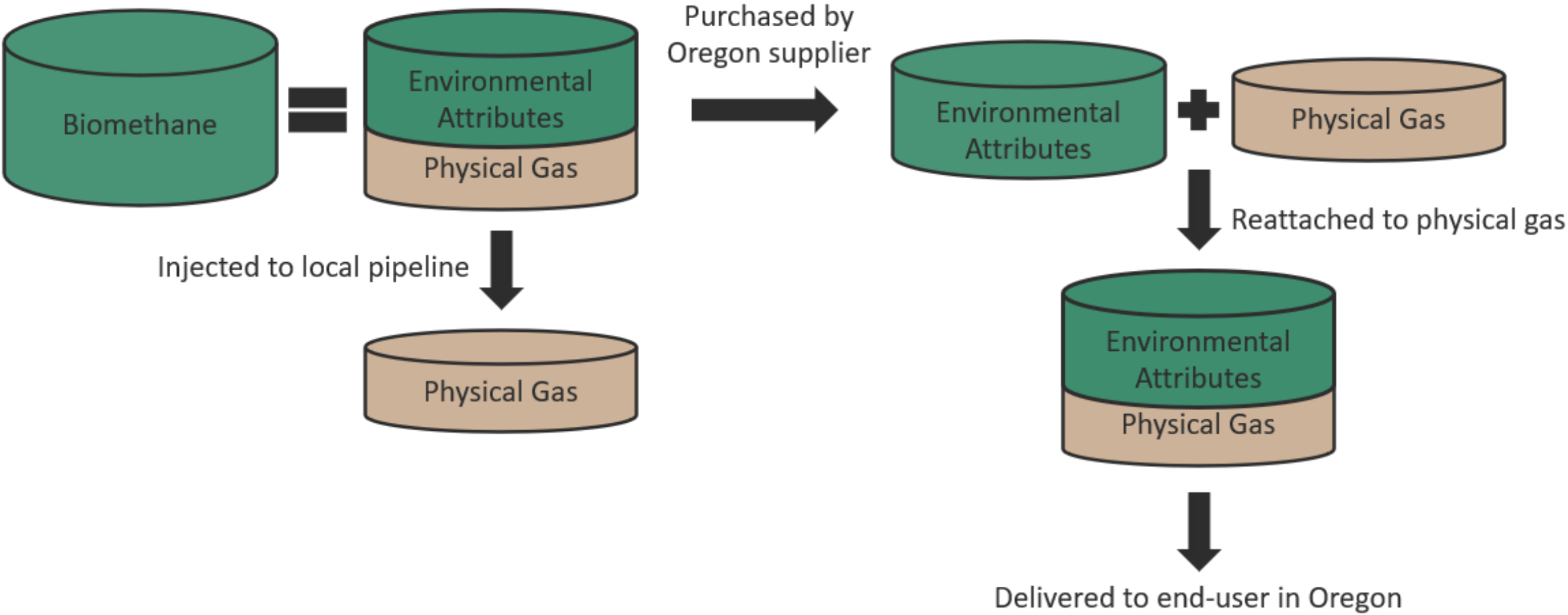


Proposed definition

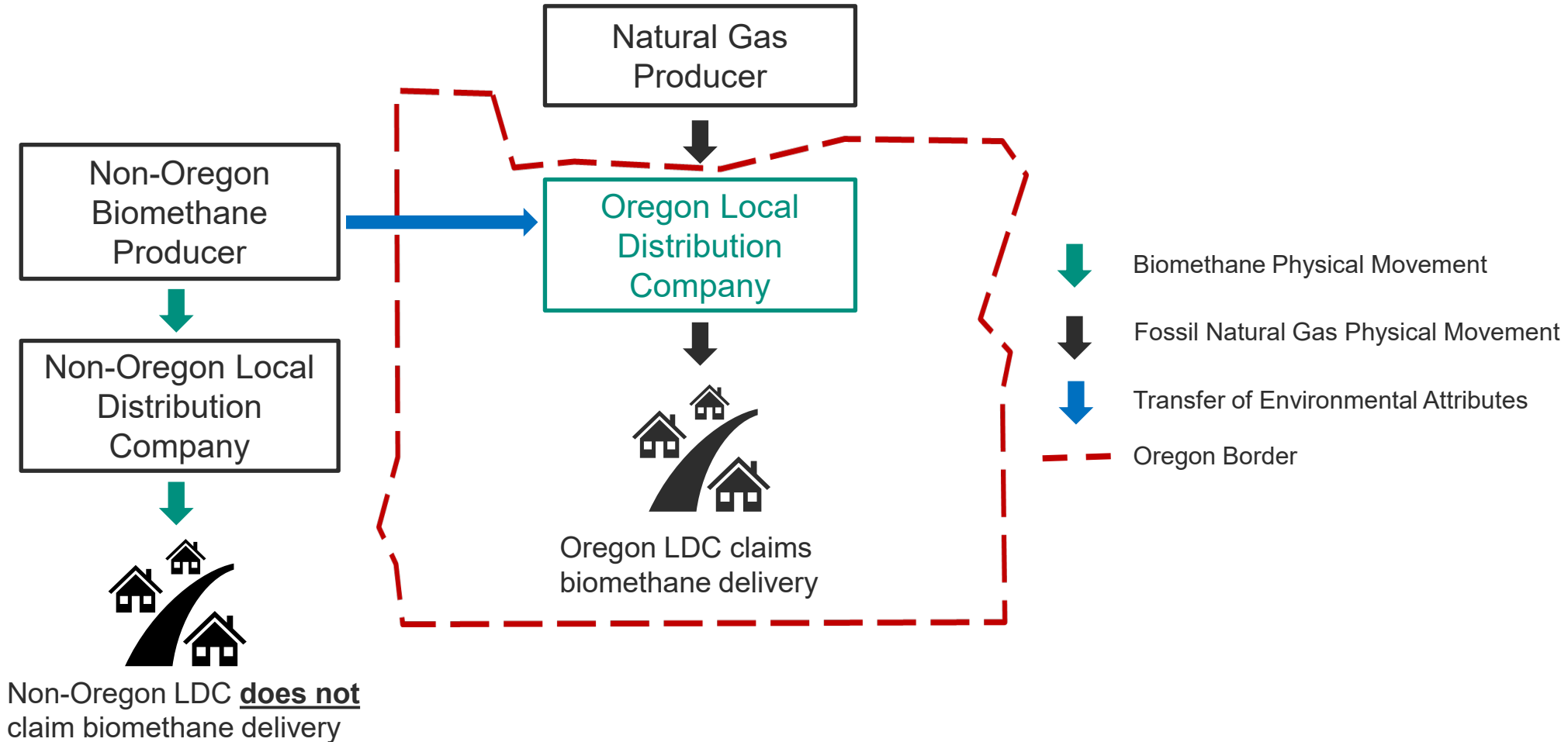
- **340-215-0020 Definitions**

(X) “**Environmental Attribute**” for the purposes of this division, means greenhouse gas emission reduction recognition in any form, including verified emission reductions, voluntary emission reductions, offsets, allowances, credits, avoided compliance costs, emission rights and authorizations under any law or regulation, or any emission reduction registry, trading system, or reporting or reduction program for greenhouse gas emissions that is established, certified, maintained, or recognized by any international, governmental, or nongovernmental agency

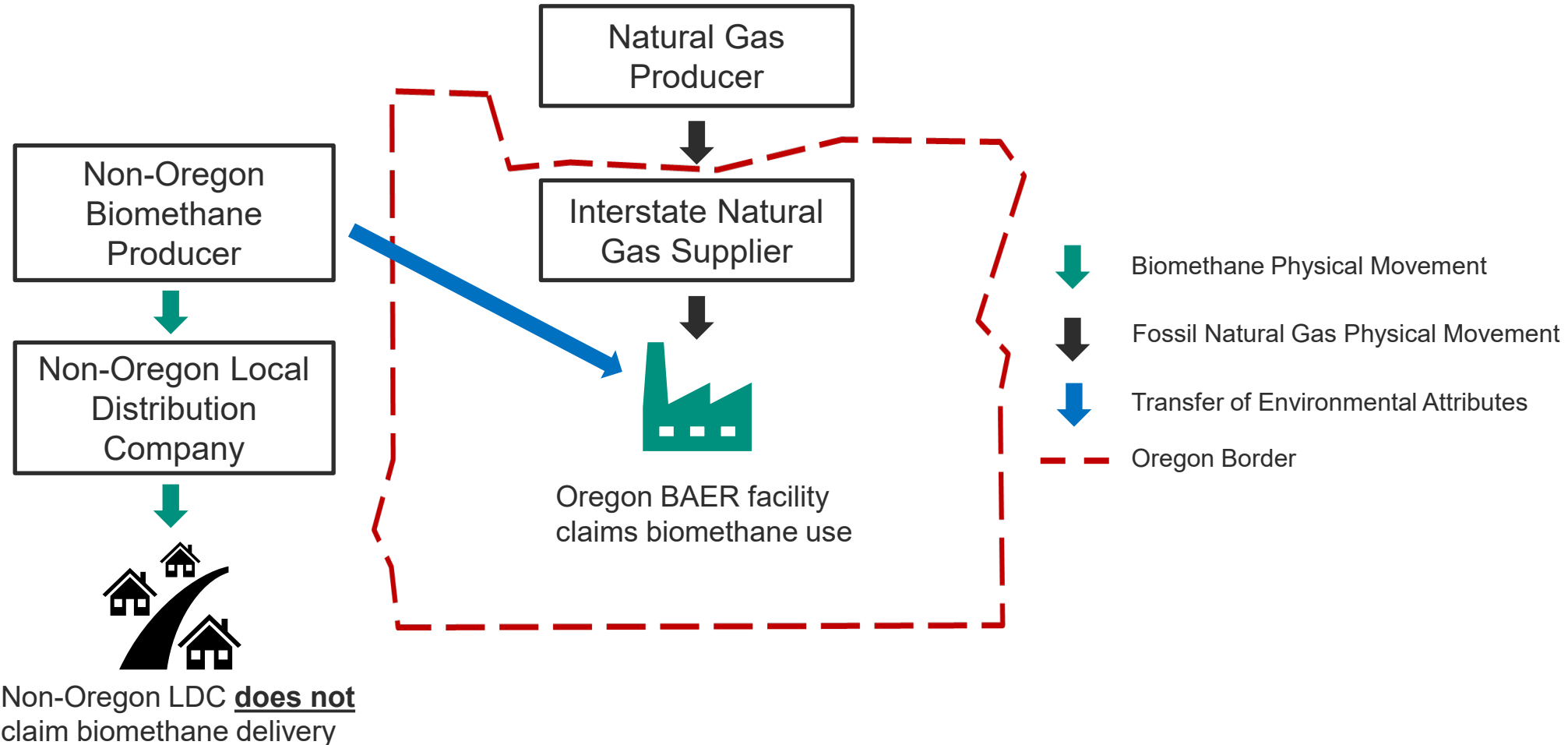
Book and Claim of biomethane



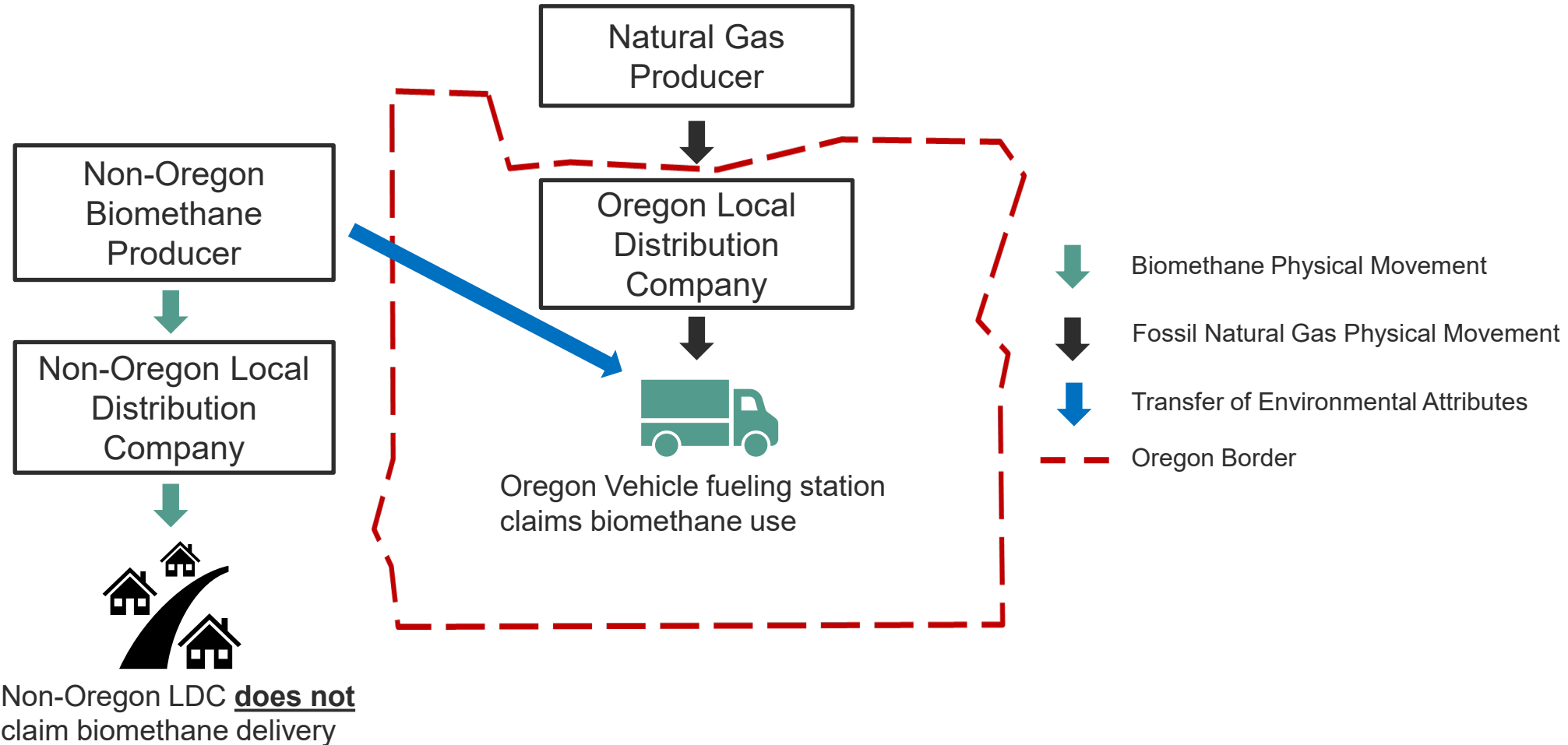
Book and Claim Example 1



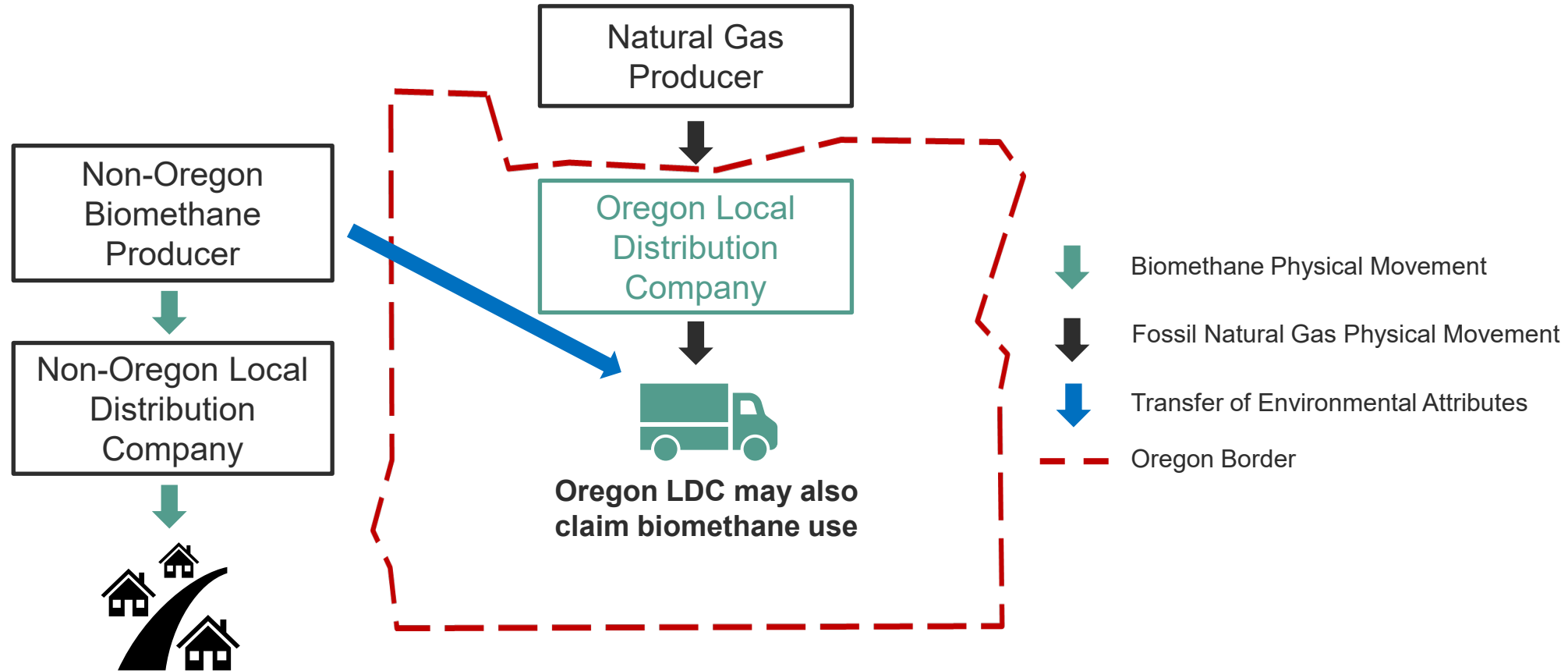
Book and Claim Example 2



Book and Claim Example 3



Book and Claim Example 3



Non-Oregon LDC does not claim biomethane delivery

Clarifying Questions

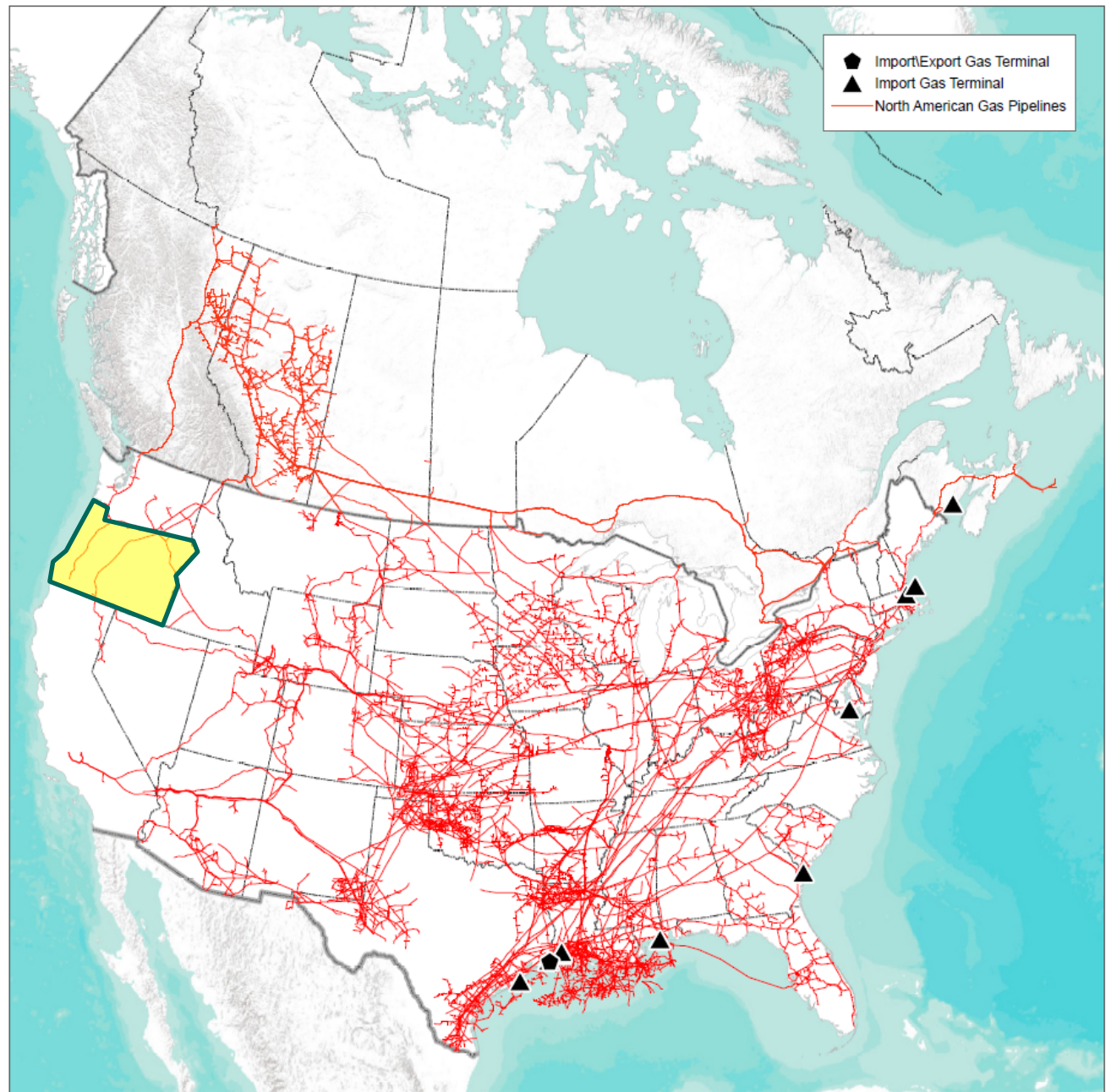


Biomethane focused discussion topics

Item	Discussion Topic
1	Background and discussion – Geographic constraints
2	Background and discussion – Requirement that fuel be injected into a pipeline for book and claim
3	Background and discussion – Vintage
4	RAC Biomethane General Discussion

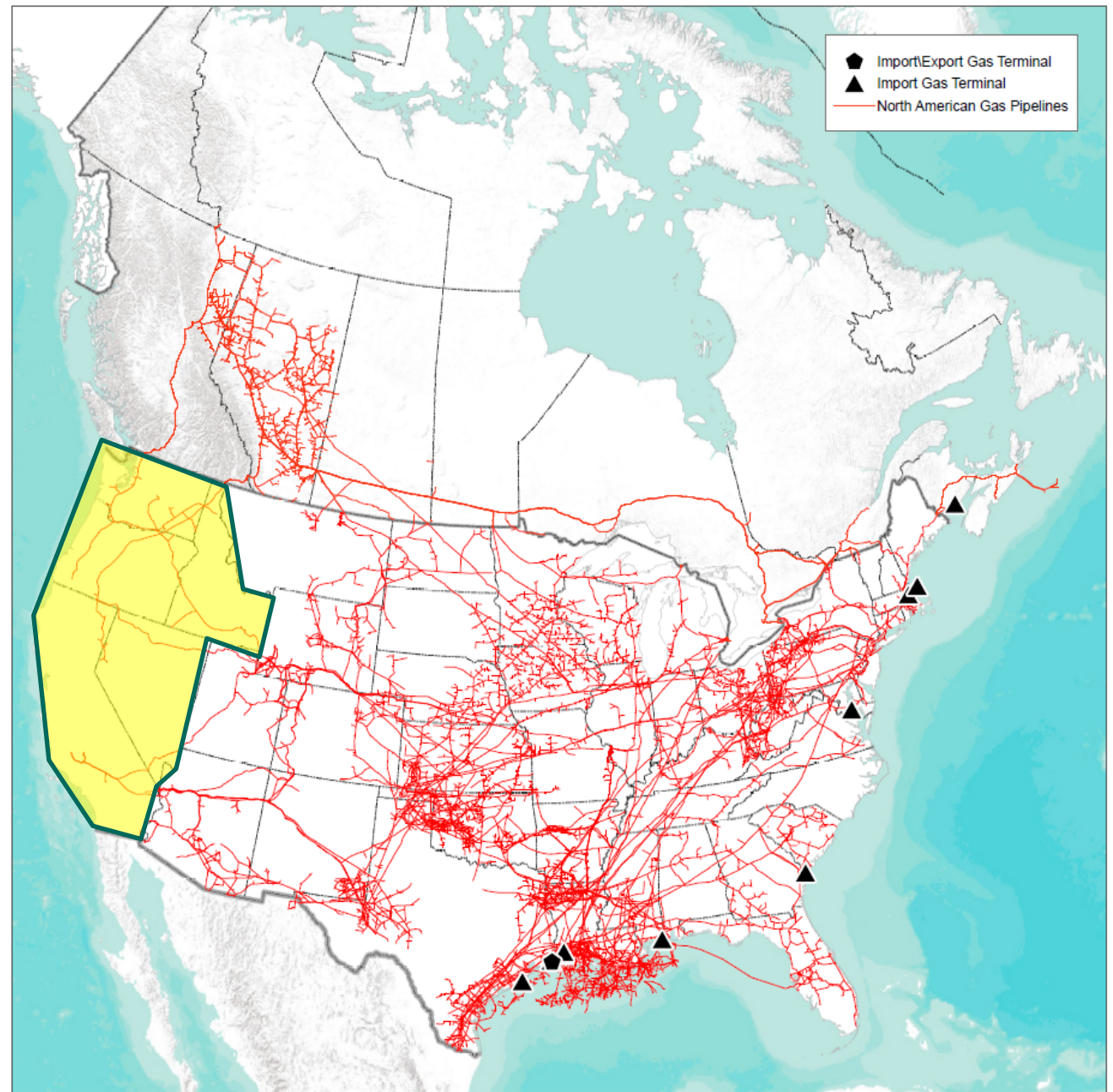
Geographic Constraints

a) Only biomethane injected into a pipeline within Oregon is eligible for book and claim.



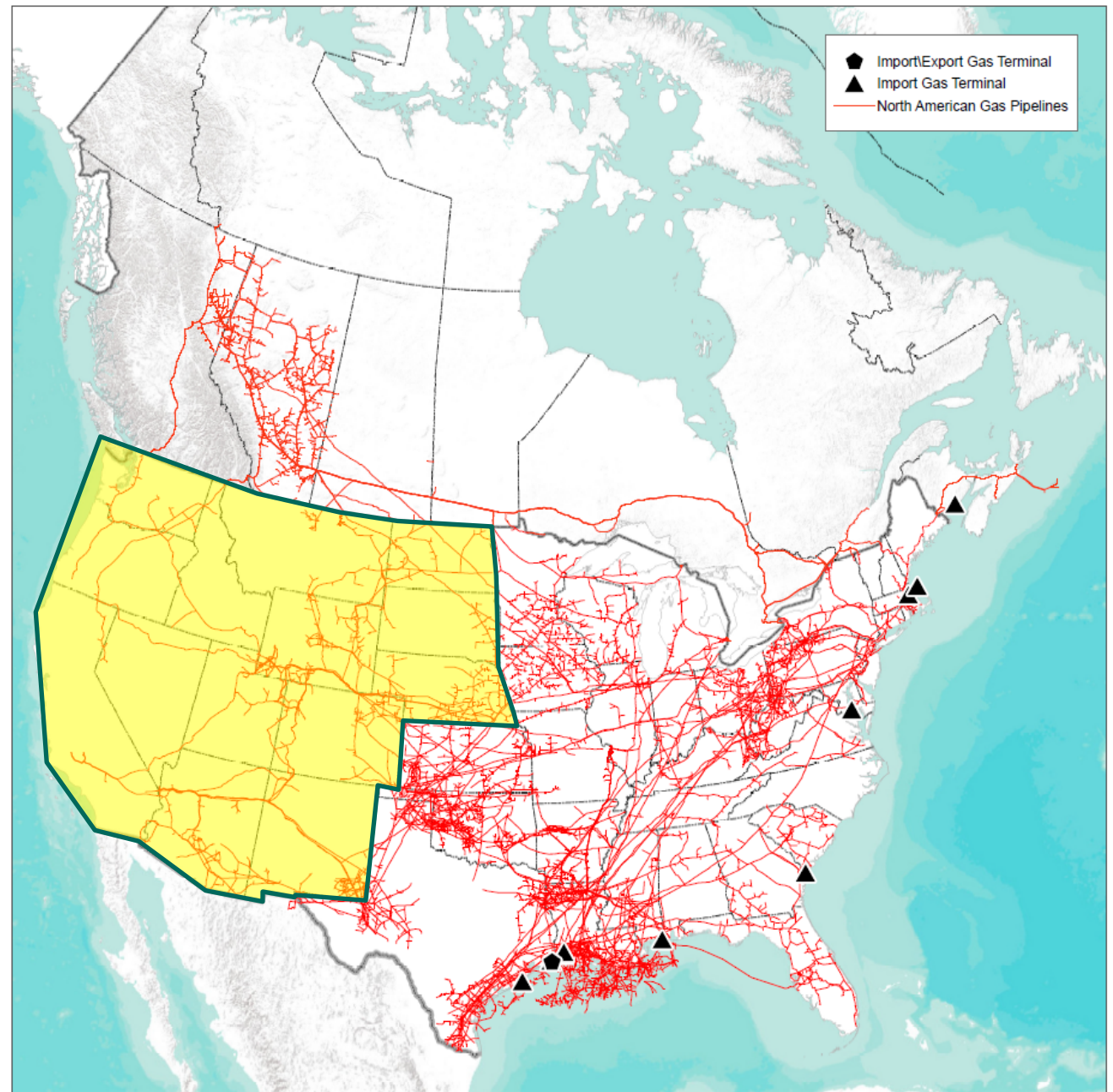
Geographic Constraints

b) Only biomethane injected into a pipeline within Oregon or adjacent states (WA, ID, NV, and CA) is eligible for book and claim.



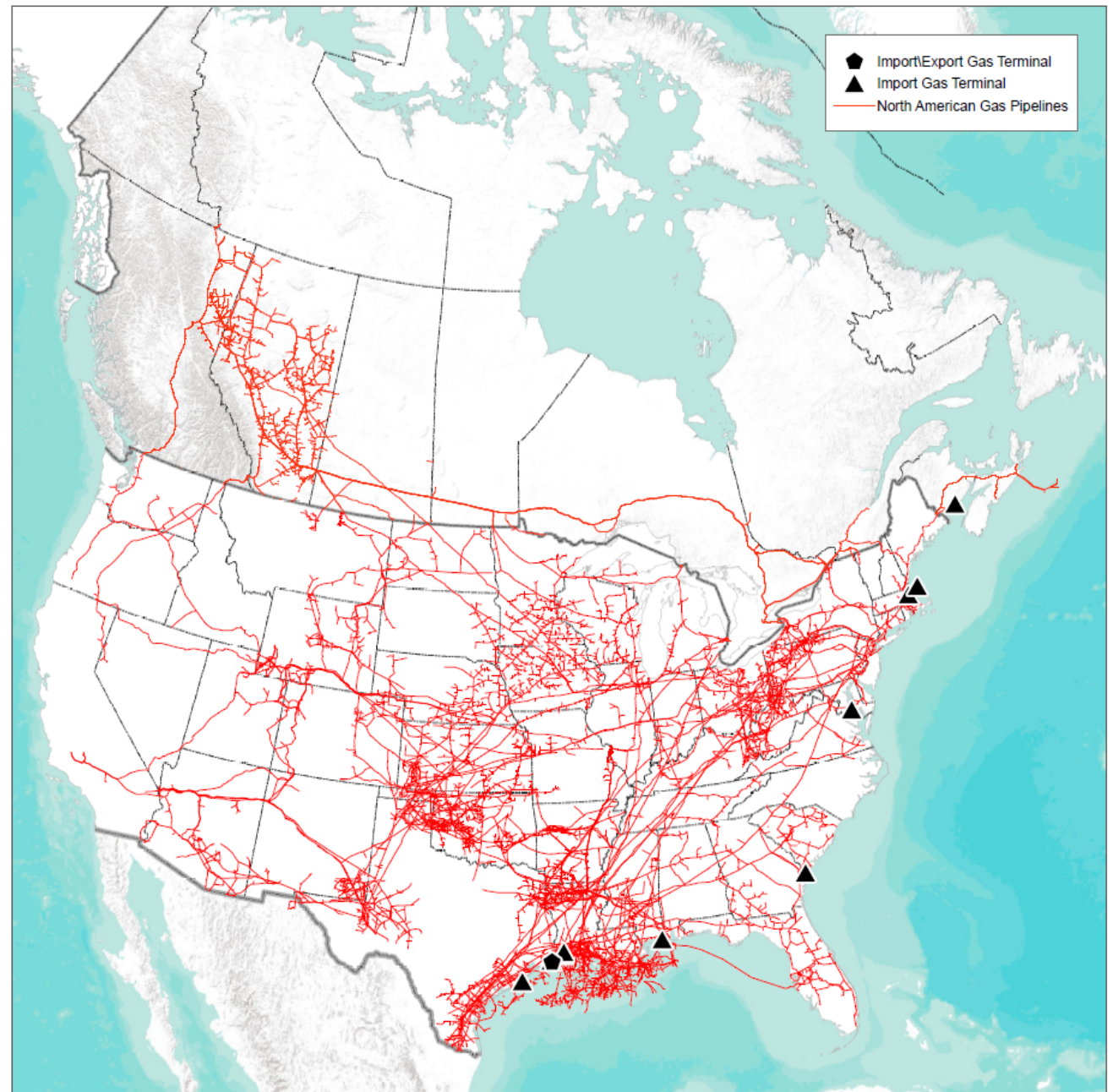
Geographic Constraints

c) Only biomethane injected into a pipeline within the western natural gas network (Pacific and Mountain storage regions) is eligible for book and claim.



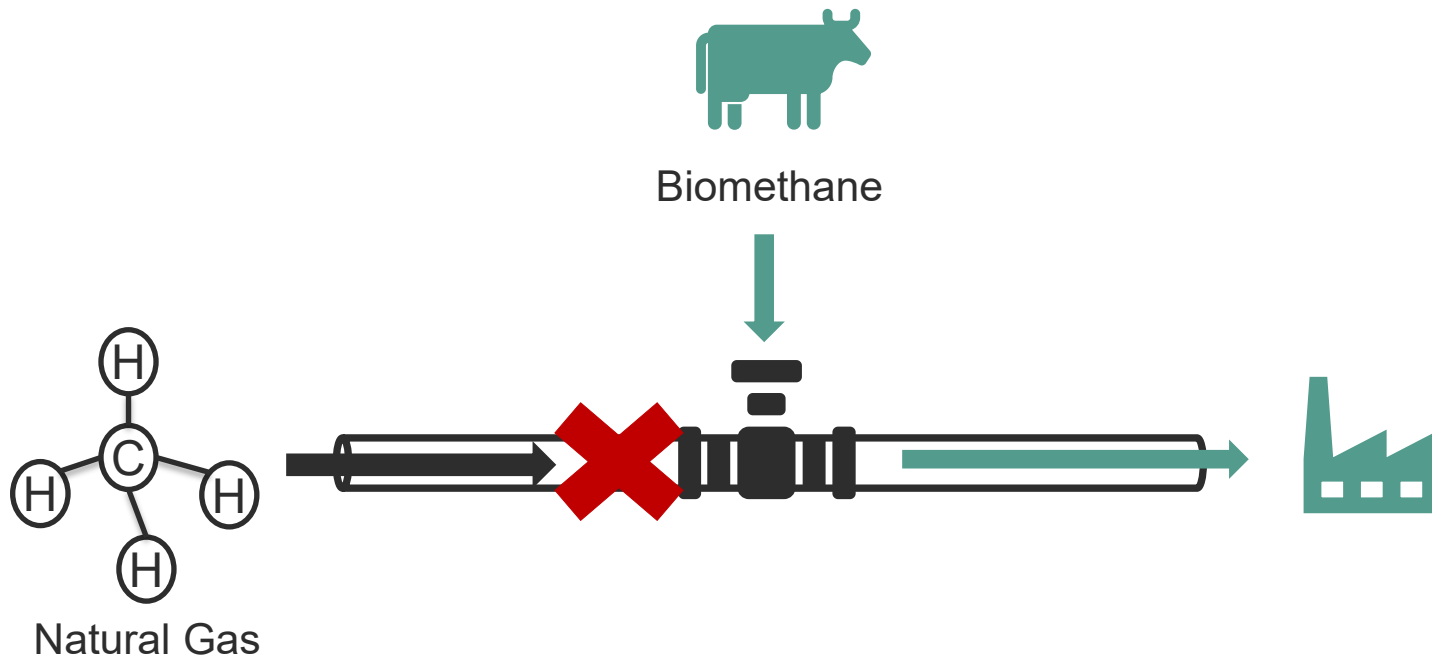
Geographic Constraints

d) Allow biomethane injected in any pipeline connected to Oregon to be eligible for book and claim.



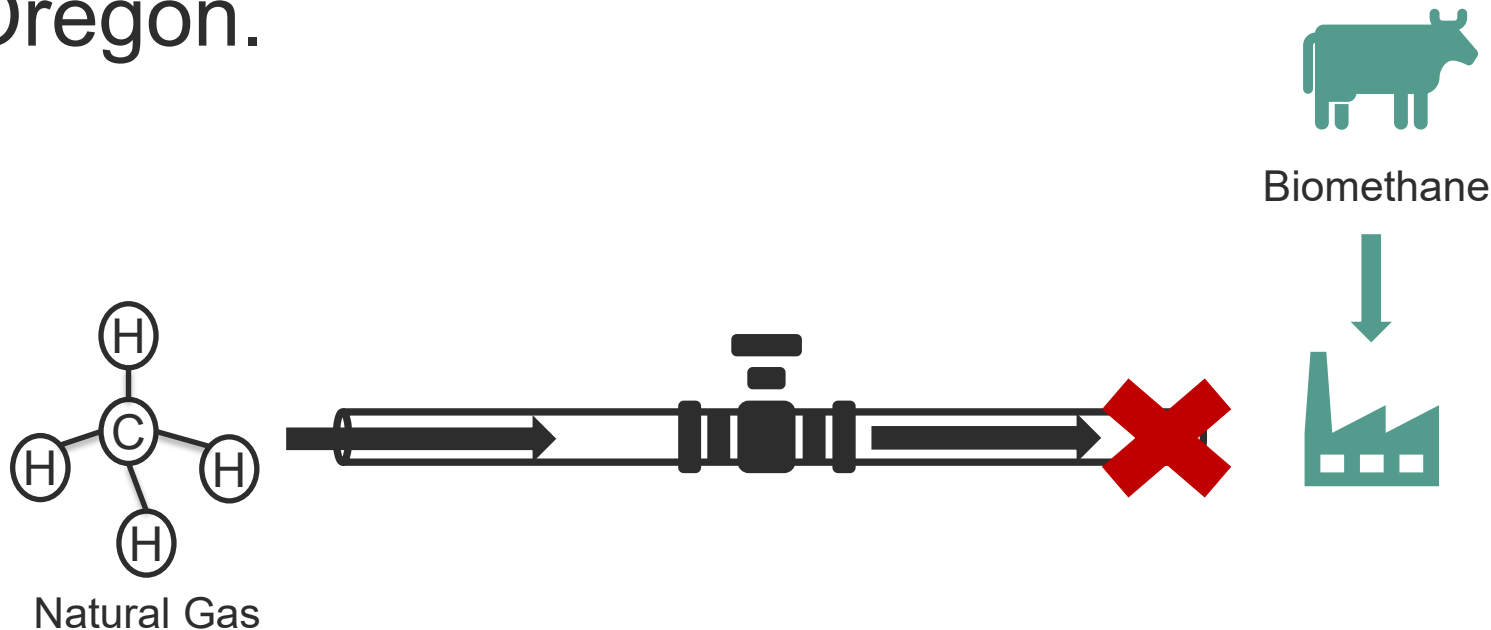
Discussion topic: Pipeline injection

a) Require biomethane to be injected into a natural gas pipeline connected to Oregon.



Discussion topic: Pipeline injection

b) Allow biomethane to be claimed if delivered directly to an end-user outside of Oregon for use where it displaces natural gas use from a natural gas pipeline connected to Oregon.



Discussion topic: Vintage

- a) Require biomethane to be claimed within the same calendar year it was injected into a pipeline.
- b) Require biomethane to be claimed within the same or subsequent calendar year it was injected into a pipeline.
- c) Require biomethane to be claimed within the same calendar year it was injected into a pipeline, or the previous calendar year for biomethane injected within the first quarter of the year.
- d) Require biomethane to be claimed within X calendar years after being injected into a pipeline.

RAC Biomethane General Discussion

- Are the Division 215 terms clear and definitions appropriate for reporting? What should we consider modifying?
- Is there additional information that should be reported or records kept to ensure the accuracy of the data?
- What geographic constraints should be considered for book and claim reporting?
- Should we require that fuel must be injected into a pipeline for book and claim?
- What limitations on vintage of RTC of injected biomethane should be included?



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4 p.m.	Adjourn meeting

Lunch Break

The meeting will resume at 1 p.m.


For Zoom technical issues, email Climate.2023@DEQ.oregon.gov

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Public Comment

We are taking public comments at this time.

Raise your hand  or press *9 on your phone to be called to give oral comment.

Please say your name and affiliation before speaking and respect any time limits and ground rules.

You may also send written comment on today's RAC discussion topics by May 30th to Climate.2023@DEQ.oregon.gov.

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Reporting Hydrogen: Introduction

	Presentation Outline
1	Goals
2	Background on hydrogen
3	Production and distribution
4	Division 215 overview
5	Discussion questions

Reporting Hydrogen: Goals

- Provide clear requirements for reporting and verifying hydrogen
- Maintain data quality and consistency
- Accurately account for Oregon's GHG emissions
- Support implementation of Climate Protection Program

Hydrogen

- Energy carrier
- High energy density (mass basis)

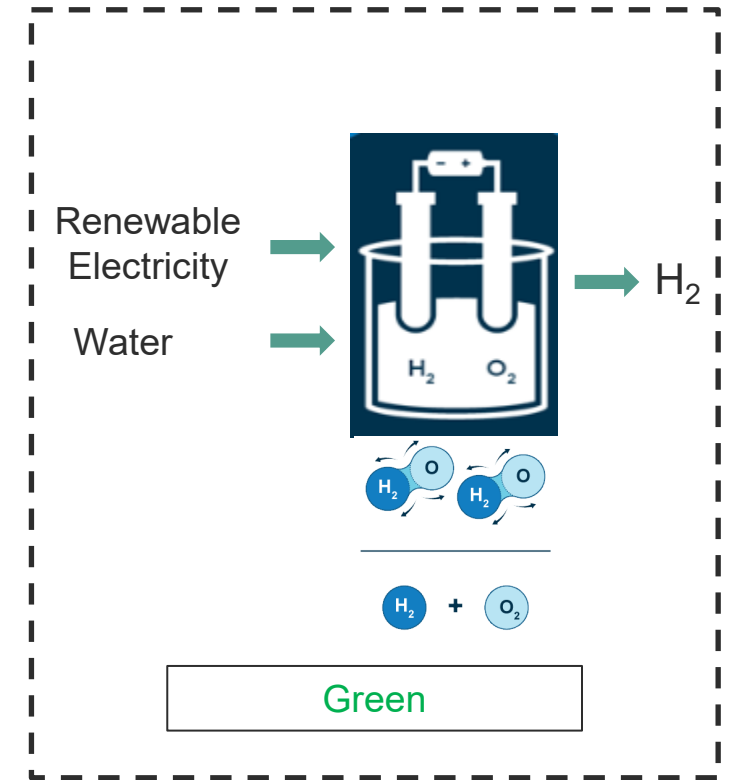
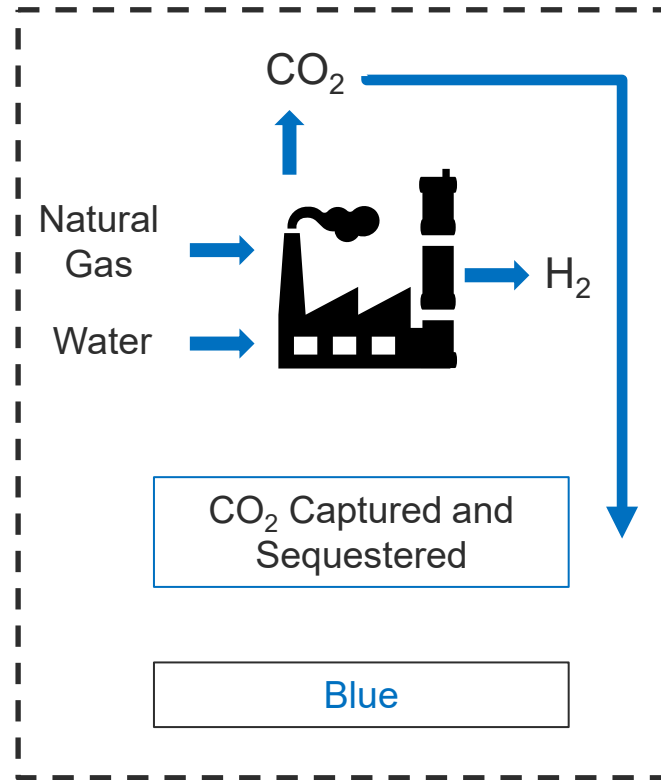
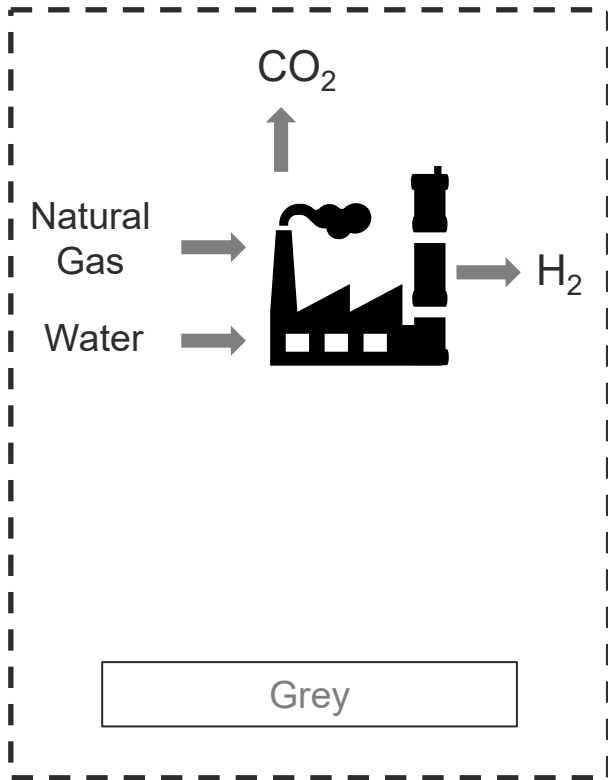
Current uses:

- Oil refining
- Production of ammonia (fertilizer), methanol, and steel

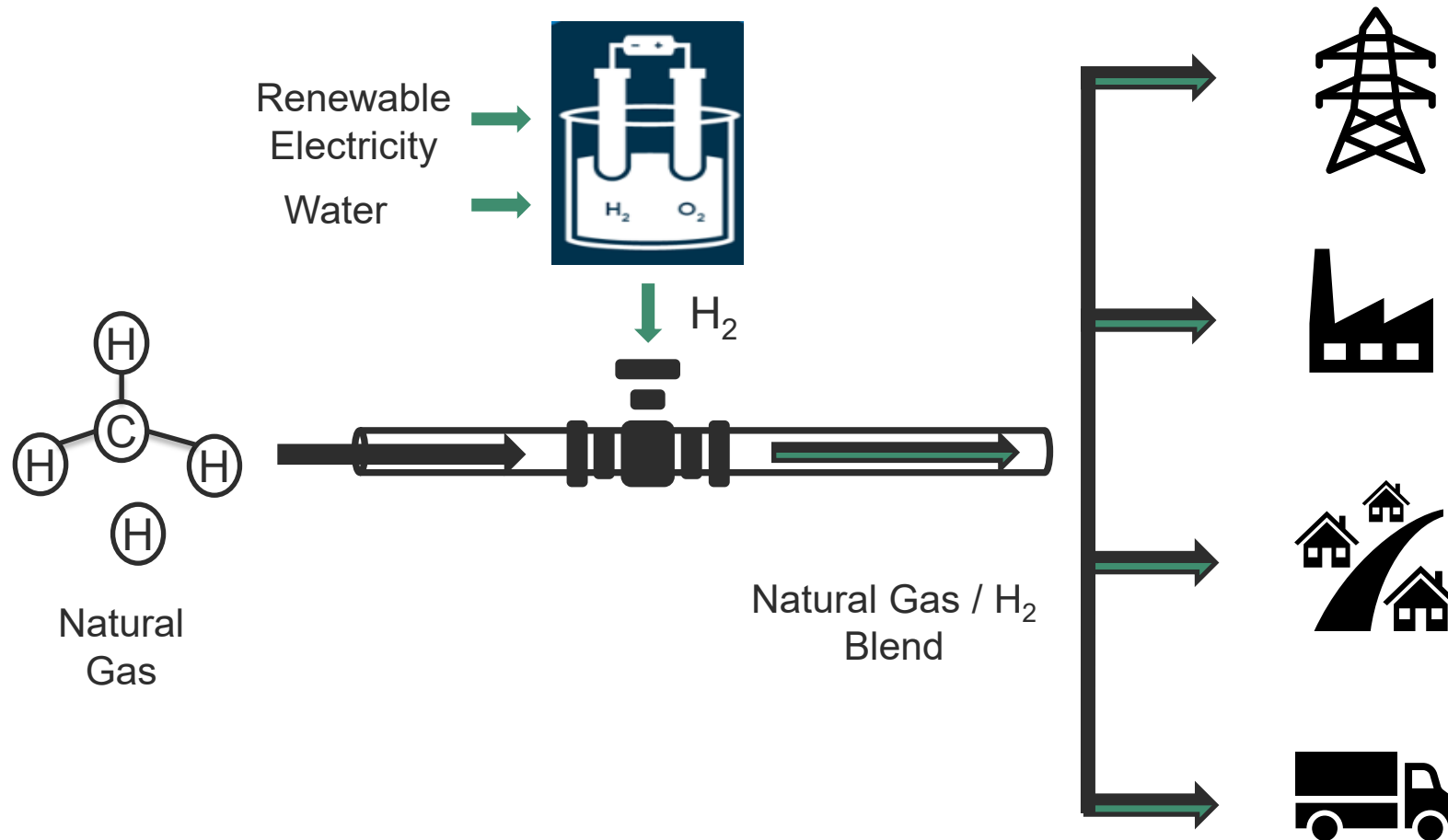
Likely future uses:

- Replace fossil fuels in industries where electrification is difficult
- Electric grid reliability and long term storage medium

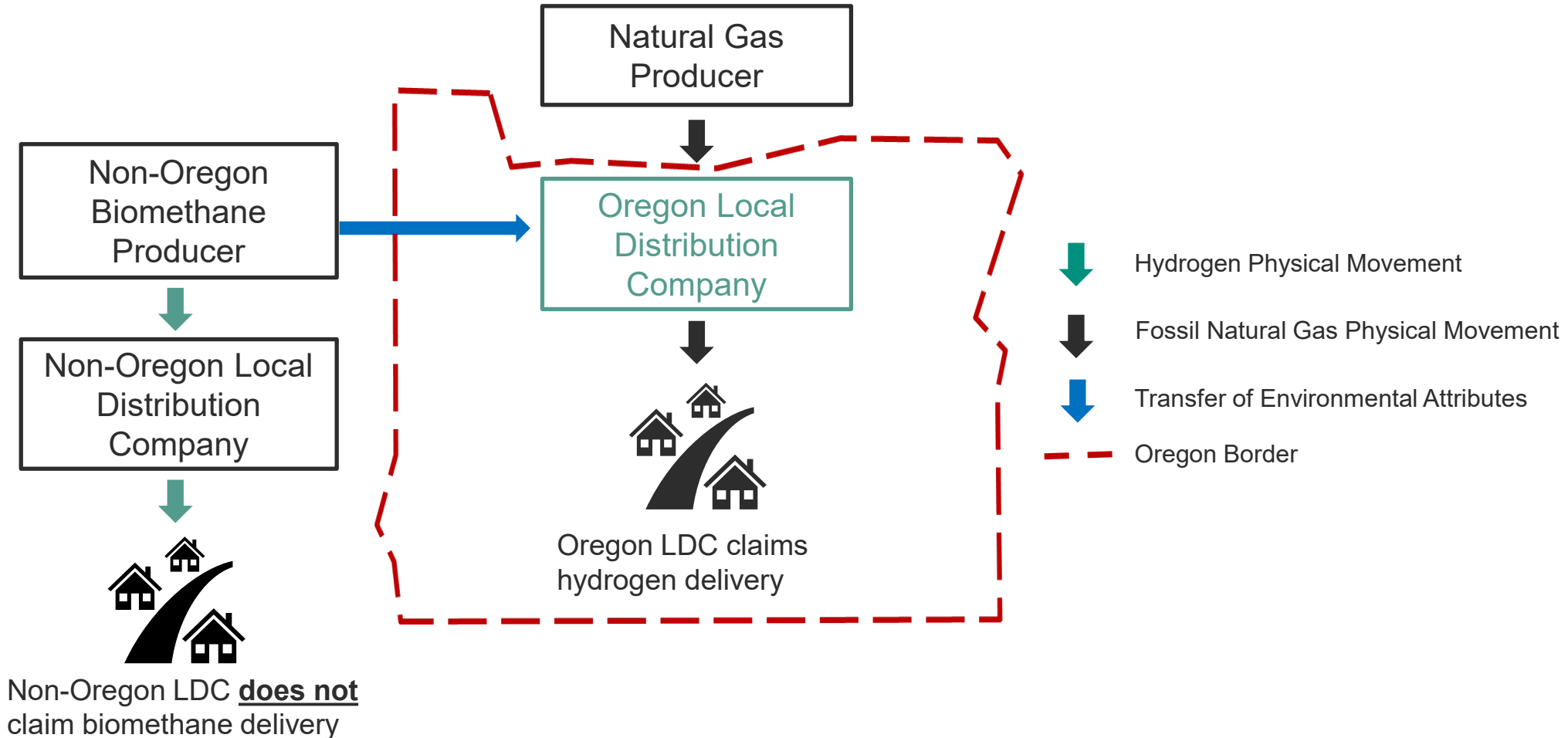
Hydrogen production



Hydrogen blending



Hydrogen Book and Claim Example



Division 215: Proposed hydrogen reporting

Since hydrogen does not produce greenhouse gases when used DEQ is proposing the reporting of information that:

- Verifies the hydrogen reported by regulated entities under division 215
- Provides information that could inform the public and others about the hydrogen used in Oregon, for example production methods

Division 215: Points of reporting of hydrogen

Air Permitted Stationary Sources:

- Report on site use of hydrogen
- Report hydrogen production using EPA Subpart P methodology (current requirement)

Natural Gas Suppliers

- Report pipeline injected hydrogen
- Report direct deliveries of hydrogen

Division 215: Reporting requirements hydrogen

Requires reporting of hydrogen and related information:

- Name and address of vendor(s) from which the fuel was purchased
- Quality and quantity based on contractual deliveries
- Feedstock(s), production methods, and production dates
- Point of origin and point of receipt and identification of end user in Oregon, if applicable
- Submission of records demonstrating that no other party can claim the attributes

When using Book and Claim with an electronic tracking system:

- Submission of records demonstrating retirement of claimed environmental attributes

Division 215: Recordkeeping requirements

Requires certain records to be maintained (OAR 340-215-0042):

- Allows for multiple documentation types
- Must be made available for verification to both verifiers and DEQ, as applicable
- Requires documentation of quality and quantity of the gas
- Requires documentation of vintage – pipeline injection must occur within the emissions data year
- Fuel production process, production facility identification information and feedstock(s)

When using book and claim:

- Requires documentation that fuel was injected into a pipeline system
- Attestations of environmental attributes demonstrating no other party can make claims

When using book and claim with an electronic tracking system:

- Retired and claimed thermal credits and environmental attributes

Hydrogen discussion topics

- What additional data should DEQ collect on hydrogen from regulated entities?
- Should DEQ allow for book and claim reporting of hydrogen?



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Climate Protection Program: BAER

- Changes since RAC 1:
 - Smaller subset of modifications required to go through BAER
 - Public notice and 30-day comment period for BAER Assessment and for draft BAER order
 - Other miscellaneous changes
 - Handling technicalities related to Notices to Construct

Climate Protection Program: BAER

- BAER and modifications
 - If actual emissions $\geq 25,000$ MT CO₂e / year, facility goes through BAER when called in by DEQ
 - Key question: When should BAER be required before a modification is approved, and when does it wait until DEQ calls facility in?
 - Require BAER review before a "big" change that would be hard to undo
 - Prioritize DEQ resources
 - Not create unnecessary delay for facilities

Climate Protection Program: BAER

- Examples of types of modifications
 - Facility adds a new manufacturing line, very different from existing equipment
 - Facility has 4 process lines, and adds a 5th
 - Facility adds a second shift, with no changes to equipment
 - Facility changes formulation of their product, with minimal changes to equipment

Climate Protection Program: BAER

Assessment required before modification if:

– RAC 1 draft:

- Increases covered emissions PTE $\geq 10,000$ MT CO₂e/year
- Total covered emissions PTE afterwards $\geq 25,000$ MT CO₂e/year

271- 0110

– RAC 2 draft adds additional criteria:

- "significant change to the equipment or processes that emit covered emissions"
- If source is already subject to BAER (actual emissions $\geq 25,000$) then DEQ may choose not to require BAER on mod, call in later instead

271- 0310

PTE = potential to emit. The max capacity of the equipment, taking into account permit limits.

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Third Party Verification Program: Division 272

Basics:

- New requirement that took effect in 2022
- Covers data reported to our Greenhouse Gas Reporting Program under Division 215 and to our Clean Fuels Program under Division 253
- Third Party Verification rules are contained in Division 272

Third Party Verification Program: Division 272

Why require third-party verification?

- Improve data reliability to track progress toward targets and support policy discussions
- Identify areas of risk and opportunity
- Decrease liability associated with incorrect data
- Obtain detailed, thorough, independent review of data

3PV Rules - OAR Chapter 340 Division 272

Rule	Contents
340-272-0010	Purpose and scope
340-272-0020	Definitions
340-272-0100s	General requirements for responsible persons regarding verification
340-272-0200s	Applications and criteria for verification bodies/verifiers and DEQ approval process
340-272-0300s	Verification services – general requirements and DEQ review
340-272-0400s	Verification services – requirements of services performed
340-272-0500	Requirements for conflict of interest evaluation

Third Party Verification Program: Division 272

Who is subject?

Greenhouse Gas Reporting Program

Entities that submit emissions data reports indicating anthropogenic emissions of 25,000 MT CO₂e or greater during the reporting year

Exemptions for: Interstate pipelines, municipal solid waste landfills

Clean Fuels Program

Holders of fuel pathways which generated 6000 combined credits and deficits or more during the reporting year

Entities whose quarterly fuel transactions reports indicated they generated 6000 combined credits and deficits or more during the reporting year

Exemptions for: Certain transaction types, pathways recertified from California

Important dates

Clean Fuels Program

Reporting Deadlines:

Quarterly fuel transaction reports due -
90 days after end of each quarter
Fuel pathway reports due - March 31
Annual reports due - April 30

Verification Deadline:

Verification statements due - August 31

GHG Reporting Program

Reporting Deadlines:

Reports due for permit holders - March 31
Reports due for petroleum and natural gas systems - March 31
Reports due for natural gas suppliers - March 31
Reports due for fuel suppliers and producers - April 30
Reports due for electricity suppliers - June 1

Verification Deadlines:

Verification Statements due for permit holders, petroleum and natural gas systems, natural gas suppliers, fuel suppliers and producers - August 31
Verification Statements due for electricity suppliers - September 30

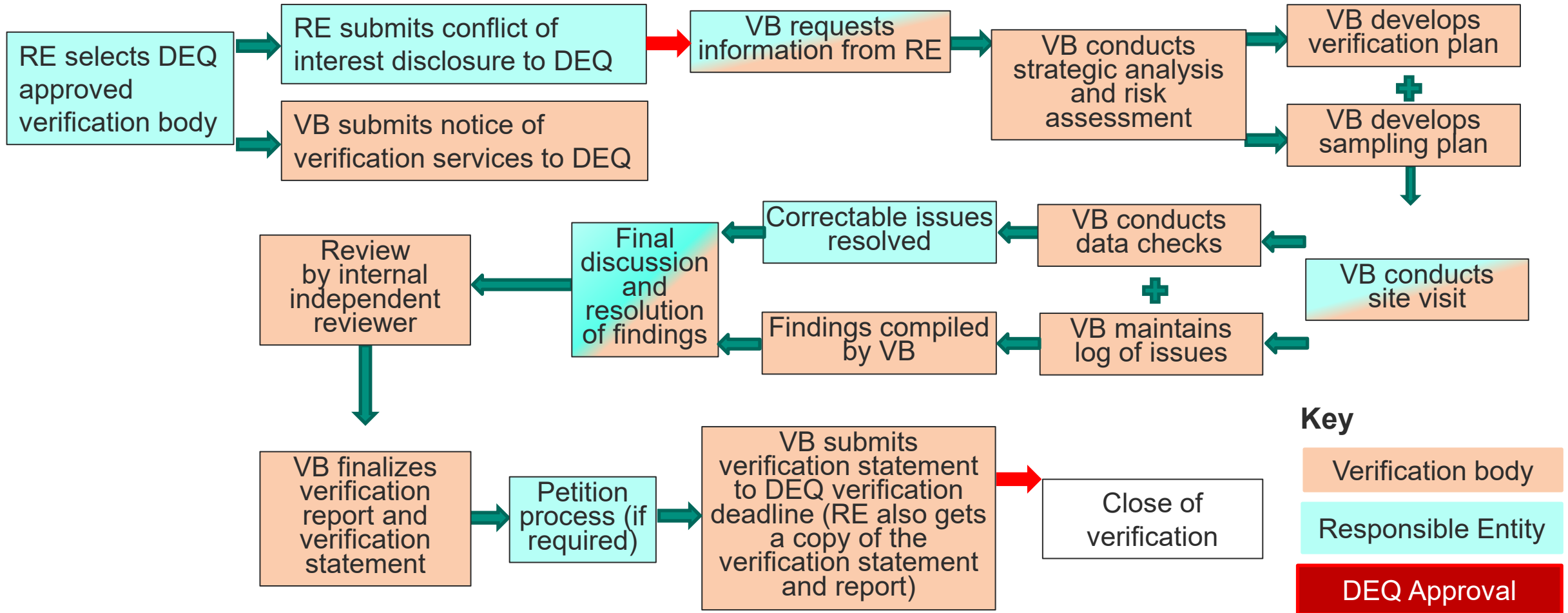
Basic Definitions

- **Responsible entity:** Regulated entity subject to the third party verification requirements
- **Verification body:** DEQ approved company hired by the responsible entity to provide verification services
- **Verifier:** DEQ approved individual who has been accredited and trained to provide verification services in Oregon

How does Verification Work?

- **Who** – Responsible entity contracts with a DEQ-approved verification body
- **When** - Verification services are conducted by a team of DEQ-approved verifiers between the applicable reporting deadline and the verification deadline
- **What** - DEQ receives a verification statement upon completion of services

Verification process



Division 272 proposed changes

Subcontractors (OAR 340-272-0210(3)(a))

Purpose of clarification:

- Rule requires each verification body to have at least 2 lead verifiers to be approved to provide services
- Current rule does not allow subcontractors to be used to meet this requirement
- DEQ is proposing an amendment to allow subcontractors to meet this requirement

Division 272 proposed changes

DEQ is considering this change to allow for additional verifiers and verification bodies to apply to provide services in Oregon.

- Would not compromise quality of verification
- DEQ has rigorous application requirements for verifiers and verification bodies and internal oversight of both
- Subcontractors are functionally equivalent to other verifiers; they are subject to the same application and training process

Division 272 proposed changes

Conflict of Interest form submissions (OAR 340-272-0100)

- Responsible entity must conduct a conflict of interest assessment between itself and its verification body prior to verification and submit a conflict of interest form to DEQ
- DEQ proposes an amendment clarifying that the responsible entity must ensure a conflict of interest form is submitted

Division 272 proposed changes

DEQ is proposing this change to simplify form administration.

- In similar programs including those operated by CARB, the verification body prepares and submits the conflict of interest form
- DEQ proposes an update clarifying that the responsible entity must ensure a conflict of interest form is submitted
- DEQ's regulatory authority covers the responsible entity so the entity is responsible for the completeness and accuracy of the form

Division 272 proposed changes

Minor updates:

- OAR 340-272-0405 (1)(b)

Adding the following: “The site visit may not take place prior to the applicable regulatory deadline for the reporting type to be verified, except under the conditions listed in OAR 340-272-0420(2)(a).”

- Where regulation allows “[number] days” for a submission, clarify to calendar days
- Minor clarity edits, typo corrections

Division 272: Applicability for Division 215 Reports

DEQ is proposing to expand applicability requirements (OAR 340-272-120) for third-party verification of division 215 reports to include **all** Electric Companies and CPP participants, regardless of reported emissions total.

Goal: Ensure both emissions and emission reductions requirements under HB 2021 and CPP are accounted for accurately and independently verified.

- “**Electric Company**” is the term used in HB 2021 and includes Electricity Service Suppliers and Investor-Owned Utilities.

Division 215: Changes to GHG Data Monitoring Plan

GHG Monitoring Plans are currently required for all sources subject to EPA GHG reporting. DEQ is proposing to expand GHG Data Monitoring Plan Requirements (OAR 340-215-0042(11)) to:

- Require all entities subject to third-party verification to maintain a GHG Data Monitoring Plan that meets the EPA monitoring plan requirements
- Proposed specific requirements for Electricity Suppliers that are more applicable to the sector

Division 215: GHG Data Monitoring Plan

GHG monitoring plans must include the following elements:

- Identification of positions of responsibility (i.e., job titles) for collecting GHG data
- Explanation of processes and methods used to collect the data needed to calculate GHG emissions
- Description of procedures and methods used for quality assurance, maintenance, and repair of monitoring systems used to provide data for the GHG reports

Division 215: GHG Data Monitoring Plan

GHG monitoring plans for Electricity Suppliers must also:

- Document queries used to determine quantity of electricity reported
- Have a reference to documents used to report transactions that are specified and unspecified, including power contracts
- Include a description of calculations to aggregated data
- Log of emissions data report modifications

RAC discussion on amendments to 272

- Are there concerns about allowing subcontractors to meet minimum lead verifier requirements?
- Are there comments on allowing the verification body to submit a conflict of interest assessment on the entity's behalf?
- What comments do stakeholders have on expanding verification applicability to all electric companies and CPP covered entities?
- What thoughts do RAC members have on the requirements for GHG Data Monitoring Plans?



Agenda

Time	Topic
10 a.m.	Welcome and agenda review
10:10 a.m.	Review and discuss potential clarifications for reporting biomethane
11:30 a.m.	Review and discuss verification of reported biomethane
12 p.m.	Lunch
1 p.m.	Public comment period
1:45 p.m.	Review and discuss issues related to hydrogen reporting
2:45 p.m.	Review and discuss updates to proposed rules from first RAC meeting
3:15 p.m.	Review and discuss proposed rule changes to Third-Party Verification Program
3:45 p.m.	Additional RAC discussion
3:55 p.m.	Next steps and wrap up
4 p.m.	Adjourn meeting

Rulemaking next steps

- DEQ is accepting written comment on discussion items.
- This presentation with the discussion questions is available on rulemaking website.
- Please submit comments by May 30th to Climate.2023@deq.oregon.gov.
- Next rulemaking advisory committee meeting (#3) is on June 27, 2023, at 10 a.m. PT.

Rulemaking resources

- Rulemaking web page: [Department of Environmental Quality : Climate 2023 : Rulemaking at DEQ : State of Oregon](#)
- Rulemaking contact: Climate.2023@deq.oregon.gov
- [Sign up for rulemaking notifications via email or text](#)

Thank You

Title VI and alternative formats

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Contact: 800-452-4011 | TTY: 711 | deqinfo@deq.state.or.us