



State of Oregon  
**Department of  
Environmental  
Quality**

# Greenhouse Gas Reporting Fee Adjustment

## 2025 Temporary Rulemaking

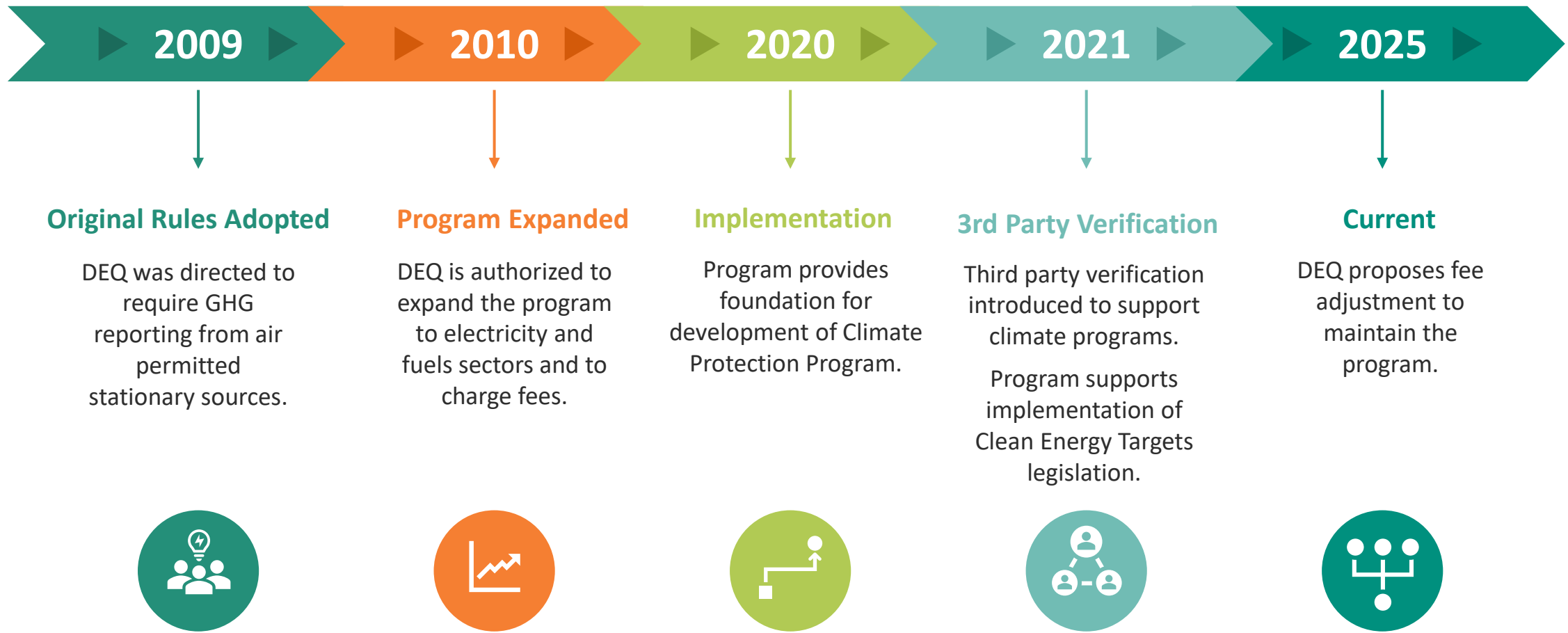
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Office of Greenhouse Gas Programs  
July 10, 2025

# Today's proposed action

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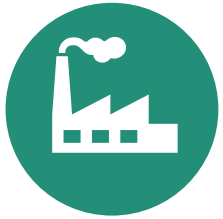
- Proposal: adopt temporary rules adjusting GHG Reporting fees and delegate permanent rules to Director
- Implements recent legislation
- Adoption now allows for adjustment to happen next invoice cycle
- Needed to account for growing program costs and static fee funding

# GHG Reporting Program Milestones



# Reporting Sectors

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Air Permitted Stationary Sources (240+)

\*emitting over 2,500 MTCO<sub>2</sub>e



Fuel Suppliers (100)

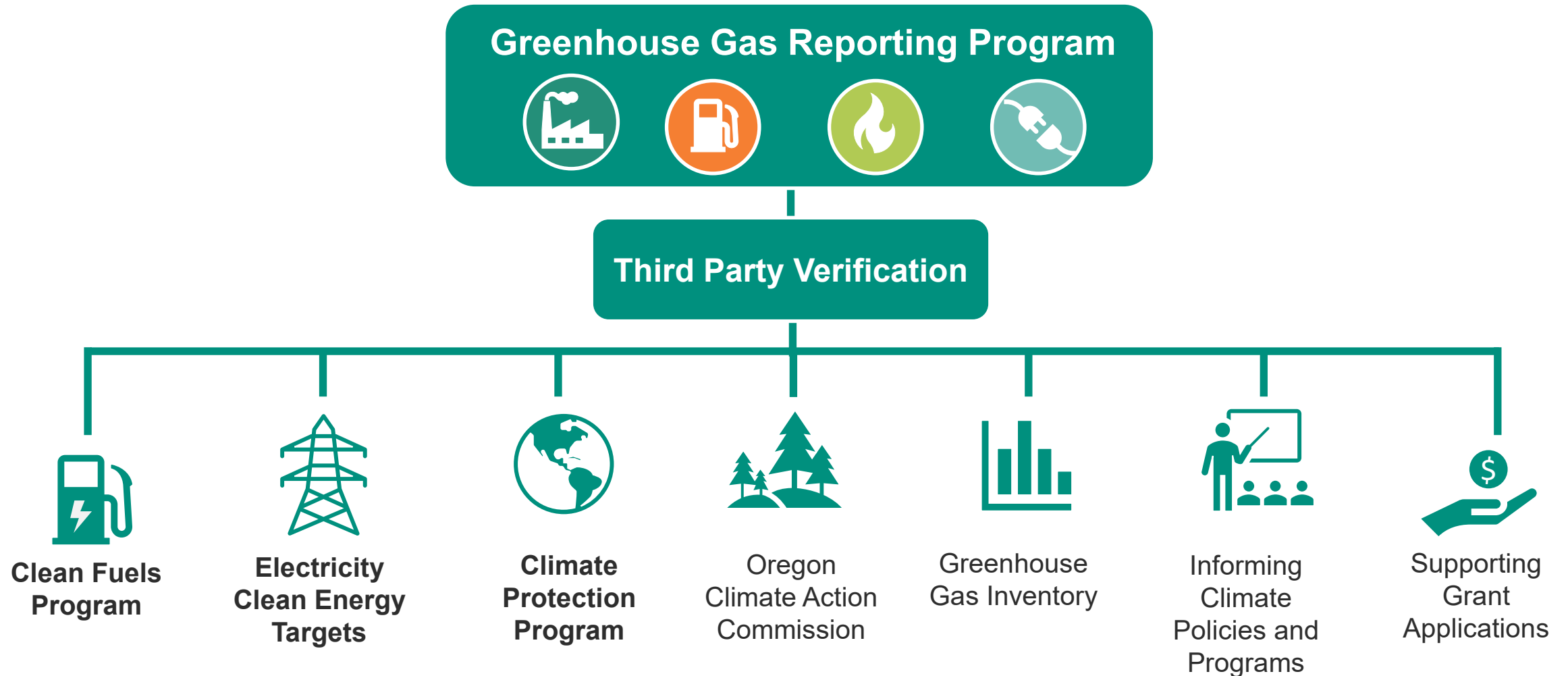


Natural Gas Suppliers and Natural Gas Systems (6)



Electricity Suppliers (40)

# How is reported data used?



# Current GHG Reporting Fees

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## Annual GHG Reporting Fees:

- ACDP = 7.3% of base air permit fees
- Title V = 15% of base air permit fees
- Fees capped at \$4,500

*This results in current annual GHG fees that range from \$47 to \$4,500 per permitted source.*

# Engagement and Fee Proposal Development

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- Over the past year, DEQ worked with regulated parties to:
  - Explain the revenue needs and invoicing timeline to support the program
  - Discuss program requirements, features, and services
  - Review the fee structure and propose alternatives based on feedback
- This collaboration resulted in a proposal that:
  - Balances annual fee percentages across different permit types
  - Addresses disproportionately small fees for certain sources
  - Spreads fee increase across wide range of different companies
  - Ensures sufficient revenue to support the program

# Proposed Fee Adjustment

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- Proposed fee changes reflect:
  - Legislation adopted as part of DEQ's 25-27 budget – approval of a revenue increase to generate an additional \$950,000 biannually
  - Discussions w/ industry representatives of different GHG fee payers
- Specific changes:
  - Increase Title V cap from \$4,500 to \$9,000
  - Increase % of sources' ACDP fees from 7.3% → 20%
  - Increase % of sources' TV fees from 15% → 20%
  - Add \$500 minimum



# Justification for Temporary Rule

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- Failing to act promptly would prejudice both the public interest and the interests of the affected parties
- Existing revenue is insufficient to sustain current staffing and functions of the GHG Reporting Program
- Curtailing program functions would prejudice parties that rely on GHG Reporting Program for:
  - Enabling regulated parties to comply with GHG Reporting rules
  - Implementing other climate programs
  - Informing decision makers

# Language for Proposed EQC Motion

*"I move that the Environmental Quality Commission, first, determine that failure to act promptly would result in serious prejudice to the public interest or the interests of the parties concerned, as described in the Justification section of the staff report for this item, and adopt the temporary rule amendment as shown in Attachment A of the staff report for this item as part of Chapter 340 of the Oregon Administrative Rules to be effective upon filing with the Oregon Secretary of State."*

*"Second, that the Environmental Quality Commission delegate authority to DEQ Director Feldon to adopt permanent rulemaking amendments consistent with the temporary rule amendments proposed in Attachment A."*

# Title VI and Alternative Formats

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