

Greenhouse Gas Reporting

Frequently Asked Questions - Electricity Suppliers

Additional guidance for reporting greenhouse gas emissions to DEQ

Overview

DEQ's [Greenhouse Gas Reporting Program](#) collects data and information related to the emissions of greenhouse gases for electricity supplied in Oregon. This document provides answers to frequently asked questions related to reporting greenhouse gas emissions by electricity suppliers subject to [OAR 340-215](#).

This document does not establish new mandatory requirements for greenhouse gas reporting nor does it amend any legal requirements of the regulations. Reporting entities should read the Greenhouse Gas Reporting Program rules for official reporting requirements.

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General reporting questions

1. Am I required to report greenhouse gas emissions to Oregon DEQ?

Electricity suppliers that import, sell, allocate, or distribute electricity to end users in Oregon must report the greenhouse gas emissions and information related to the generation of electricity distributed to end-users in this state, regardless of whether the electricity was imported or generated in Oregon, as prescribed in OAR 340-215.

Reporting requirements are specific to electricity supplier type, which include investor-owned utilities, electricity service suppliers, and consumer-owned utilities. There are additional requirements for multijurisdictional utilities, asset-controlling suppliers, and third parties who report on behalf of consumer-owned utilities.

2. Who is the designated representative?

According to OAR-340-215-0020(16), a “designated representative” is a person responsible for certifying, signing, and submitting a greenhouse gas emissions data report, and any registration or report required to be submitted under OAR 340-215, on behalf of a regulated entity.



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For electricity supplier purposes, the designated representative is also the responsible official account holder in Your DEQ Online.



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3. When will third party verification of reported data begin? To whom does it apply?

Oregon third party verification requirements apply to 2021 calendar year data submitted beginning in the spring of 2022.

Third party verification requirements for annual greenhouse gas emissions reports, including exemptions, are available in OAR 340-272-0120. Verification primarily applies to large facilities and suppliers submitting reports with emissions equal to or greater than 25,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) in the prior calendar year.

Interested parties can learn more at the “Oregon Third Party Verification Program” [webpage](#).

4. When will the Climate Protection Program (cap and reduce policy) be implemented?

DEQ is in the process of developing a new Climate Protection Program to reduce greenhouse gas emissions and address the effects of climate change. This program will limit emissions from some of the most significant sources in Oregon, including large stationary sources, transportation fuels, and other liquid and gaseous fuels, such as natural gas. The timeline for this program is still in development. Interested parties can learn more at the “Climate Protection Program” [webpage](#).

5. How long must I retain records supporting my annual greenhouse gas emissions report?

Reporting entities are required to retain all records of emissions data, and any applicable supporting documents, for at least five years. Note that electricity suppliers that are subject to the requirements of OAR 340-272-0120 (third party verification) are required to retain records for at least seven years beginning with data for the 2021 reporting year.

6. When is the reporting deadline for electricity suppliers?

Electricity suppliers must annually report by June 1 following the emission calendar year, unless otherwise established by DEQ.

7. What if I am submitting data to DEQ considered to be confidential business information/trade secret?

Electricity supplier Greenhouse Gas Reporting data submitted to DEQ through Your DEQ Online is not viewable from this platform by the public. However, DEQ may release submitted greenhouse gas emissions data and information in response to a public records request. If you feel that you are submitting confidential information to DEQ that should not be released to the public, please contact us (GHGReport@deq.state.or.us) prior to submitting your data. Information considered confidential is only exempt from release to the public if it meets the requirements outlined in [ORS 192](#) Oregon's public record law. Potential exemptions include, but are not limited to, confidential business information/trade secrets, attorney-client privileged communications, internal advisory communications and certain types of personally identifiable information.

8. Do I need to report sulfur hexafluoride (SF₆) emissions?

According to OAR 340-215-0030 (2)(c)(C), an investor-owned utility is required to report emissions from electric and distribution equipment (SF₆ emissions) to DEQ if the

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total SF6 emissions associated with the electric power system facilities physically located in Oregon meet or exceed **2,500** metric tons of carbon dioxide equivalent (MTCO₂e) during the previous calendar year. Once emissions meet or exceed the threshold, an investor-owned utility must report in subsequent years, regardless of the amount of emissions. Utilities may stop reporting when they meet all applicable cessation requirements in OAR 340-215-0034. Consumer-owned utilities do not need to report SF6 emissions and reporting this data is optional for third parties reporting on behalf of a consumer-owned utility.



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9. I am required to report SF6 emissions. What data do I report?

For those investor-owned utilities that are required to report SF6 emissions, reporters must use calculation methodologies in the Environmental Protection Agency's (EPA's) 40 C.F.R. part 98 subpart DD to calculate emissions. While EPA's protocols require reporting of the total emissions for all electric transmission and distribution equipment owned or operated by the utility, investor-owned utilities must only report emissions from equipment physically located in Oregon to DEQ. Utilities must report emissions in metric tons of carbon dioxide equivalent (MTCO₂e) in Your DEQ Online and submit documentation substantiating the emissions calculations with the report.

Your DEQ Online questions

10. How do I start reporting in Your DEQ Online?

Emissions data reports must be submitted through Your DEQ Online. All utilities need to have a responsible official (i.e., designated representative) account holder with DEQ to certify and submit the emissions report. The responsible official must register through the [Your DEQ Online Portal](#) and have their account verified by DEQ before they are able to access reporting features.

The Greenhouse Gas Reporting Program has published a user-guide for completing an electricity supplier report on the "Greenhouse Gas Reporting Program Resources and Forms" [webpage](#), under the Electricity Suppliers section. There are also additional resources specific to account registration on the "Your DEQ Online Help" [webpage](#).

11. What kind of Your DEQ Online user accounts does my utility need to report in the system?

Each utility needs to have at least one responsible official account in order to report to DEQ. Multiple responsible official accounts for one utility are permissible. Consultant accounts are optional, and might be useful to utilities who have someone, either inside or outside their organization, that helps prepare or review their report submission. Users with a consultant account may prepare, but not certify and submit reports.

12. I have a responsible official account. What is the difference between my pin and my password?

Your password is used to log in to Your DEQ Online. Only responsible official accounts have a pin in addition to a password. The pin is used for submitting reports on the Submission tab of your reporting obligation.

13. Should consumer-owned utilities that designate a third party to report on their behalf register for a Your DEQ Online account?

No, entities that designate a third party to report on their behalf will not have accounts nor access to information in Your DEQ Online. Consumer-owned utilities that designate

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a third party to report on their behalf should contact their designated third party directly to verify information and data reported to DEQ. Read more about the third party designation process [here](#).

14. I see a payment tab in my Your DEQ Online reporting obligation. Is there a fee associated with my emissions report?

There are no fees associated with reporting greenhouse gas emissions in the electricity sector. Your DEQ Online is a platform that is used by multiple programs at DEQ, so you will see some features that are not relevant to the Greenhouse Gas Reporting Program.

15. How are emissions calculated in Your DEQ Online?

Your DEQ Online automatically calculates emissions associated with power supplied to end-users in Oregon based on information reported by the electricity supplier. Emissions calculations are based on the megawatt-hours reported for each electricity generating source, multiplied by the transmission loss factor (when not measured at the busbar), and the DEQ-assigned biogenic and anthropogenic emission factors in metric tons of carbon dioxide equivalent per megawatt-hour (MTCO_{2e}/MWh). Your DEQ Online rounds to three decimal places in emission factor and emissions calculations.

Reporting megawatt-hours and emissions questions

16. What criteria must be met for electricity to be reported as from a specified source?

Report power as purchased from a specified source when the electricity supplier can provide documentation that a power contract designated purchases from a specific generating power facility, unit, or DEQ-approved asset-controlling supplier at the time the transaction was executed. A power source cannot be retroactively designated after a transaction occurs. OAR 340-315-0120(A)(i)-(ii) provides guidance on when a specified source must be reported as specified.

Additionally, the following definitions in Greenhouse Gas Reporting Program rule (OAR-340-215-0020) apply to identifying a specified source:

(45) “Power contract” as used for the purposes of documenting specified versus unspecified sources of electricity means a written document, including associated verbal or electronic records if included as part of the written power contract, arranging for the procurement of electricity. A power contract for a specified source is a contract that is contingent upon delivery of power from a particular facility, unit, or asset-controlling supplier’s system that is designated at the time the transaction is executed. Power contracts may be, but are not limited to, power purchase agreements, enabling agreements, electricity transactions, and tariff provisions, without regard to duration, or written agreements to import or export on behalf of another person.

(53) “Specified source of electricity” or “specified source” means a facility or unit that is allowed to be claimed as the source of electricity delivered. The regulated entity must have either full or partial ownership in the facility or unit, or a written power contract to procure electricity generated by that facility or unit. Specified facilities or units include cogeneration systems. Specified source also means electricity procured from an asset-controlling supplier recognized by DEQ.



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17. A source of power was not specified at the time of a power transaction occurred, but I later identified that power as generated from a specific source. Can I list that source as specified?

No, sources can only be considered specified if they were designated at the time of reporting. It is important to keep in mind that a power contract for a specified source is contingent upon delivery of power from a particular facility, unit, or asset-controlling supplier's system that is designated at the time the transaction is executed.

18. When do I report power as generated from a specified source?

Report power as generated from a specified source when the electricity supplier is (1) a full or partial owner or operator of the generating facility or unit, (2) party to a power contract for a fixed percentage of generation from the facility or unit, or (3) party to a tolling agreement and rents a facility or unit from the owner, or is an exclusive power deliverer that is not a retail provider and that has prevailing rights to claim electricity from the specified source.

19. How do I report electricity from the electricity imbalance market or other centralized market?

The Greenhouse Gas Reporting Program rules require purchases from the electricity imbalance market (EIM), or other centralized market, to be reported as unspecified power purchases. However, they further require that those EIM purchases be separately identified from other unspecified purchases. A reporter could think of it as categorizing purchases into "Specified Purchases," "Unspecified Purchases" and "Unspecified EIM Purchases" for reporting purposes.

Guidance on reporting EIM purchases can be found in the definition "Unspecified source of electricity" OAR 340-215-0020 (57):

(57) "Unspecified source of electricity" or "unspecified source" means a source of electricity that is not a specified source at the time of entry into the transaction to procure the electricity. For the purposes of this division, electricity imported, sold, allocated, or distributed to end users in this state through an energy imbalance market or other centralized market administered by a market operator is considered to be an unspecified source.

20. What is the emission factor for unspecified power purchases?

DEQ's rules assign an emission factor of 0.428 metric tons of carbon dioxide equivalent (MTCO_{2e}) to both unspecified power purchases and energy imbalance/other centralized market purchases for calculating emissions.

21. Why are power purchases from Powerex and Tacoma Power considered to be unspecified?

Powerex and Tacoma Power are not approved asset-controlling suppliers with DEQ. Unless a purchase from these entities was from a specific generating facility identified in a power contract at the time of purchase, this purchase is considered unspecified power since the power purchased is coming from a system mix, not a specific facility.

You can read more about asset-controlling suppliers [here](#).



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22. Why do I need to register electricity generating facilities with DEQ before the reporting deadline?

DEQ assigns anthropogenic and biogenic facility-specific emission factors for all electricity generating sources registered by electricity reporters.

To allow time for DEQ to calculate and assign emission factors for each electricity generating facility, and to upload them to DEQ's online reporting system, specified source electricity generating facilities from which power was purchased or generated need to be registered in advance of the reporting deadline. The Specified Source Registration Workbook can be found on the "Greenhouse Gas Reporting Resources and Forms" [webpage](#), under the "Electricity Suppliers" section. This form is sent directly to reporting utilities ahead of the reporting deadline, generally by February of each year.

23. How are emission factors assigned to specified sources?

In general, the emission factor calculation includes totaling the facility-level emissions for the calendar year, including the carbon dioxide, methane, and nitrous oxide emissions emitted from electricity generation in metric tons of carbon dioxide equivalent (MTCO₂e) and dividing that total by the net electricity generation in megawatt-hours (MWh) from the facility.

DEQ's primary data sources for the development of 2020 emission factors include 2019 data from the U.S. Environmental Protection Agency reported through the EPA's Greenhouse Gas Reporting Program (40 C.F.R. Part 98) and 2019 data published by the U.S. Energy Information Administration. When those data sets were unavailable for a specified source, DEQ used alternative methods.

Descriptive methodology of how DEQ assigns emission factors to specified sources can be found on the "Greenhouse Gas Reporting Resources and Forms" [webpage](#), under the "Electricity Suppliers" section.

Read about proposing alternative emission factors to DEQ [here](#).

24. An electricity generating facility from which I purchase power uses multiple fuel types or is a cogeneration facility. Why is there only one emission factor for this facility?

When DEQ develops an emission factor for a facility that uses multiple fuel types, DEQ factors in the relative proportions of million British Thermal Units (MMBTU's) of fuel used for electricity fuel consumption reported to the Energy Information Administration (EIA) on EIA Form 923 for that facility each year.

DEQ will, however, consider a request to register a unit (as opposed to a facility) if justified in writing. A unit must be written in a contract as a specified source of power or owned by a utility for consideration of registration.

25. Can a specified source include more than one facility?

In general, multiple power generation facilities cannot constitute a single specified source, except for asset-controlling suppliers approved DEQ. Under OAR-340-215-0020 (53), a "specified source of electricity" or "specified source" means a facility or unit which is allowed to be claimed as the source of electricity delivered. Thus, a reporting entity cannot register multiple facilities as a single source for purposes of obtaining a single specified source emission factor.



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26. What are the criteria that DEQ considers for unit-specific versus facility-specific emission factor assignment?

A request to register a unit (as opposed to a facility) for reporting of emissions data must be justified in writing at the time facility and unit information is collected through DEQ's *Specified Source Registration Workbook* (typically February of each year). A unit must be owned by a utility or written in a contract as a specified source of power for consideration of registration. DEQ will contact reporting entities directly to request this information ahead of the reporting deadline.

27. Does partial ownership of a generating facility affect the emission factor calculation assigned to the facility?

No, a registered electricity generating facility will receive a single emission factor for the entire facility which will then be applied to megawatt-hours (MWh) generated or purchased by an entity and delivered to end-users in Oregon. DEQ will consider assigning an emission factor for a specific unit at an electricity generating facility if that unit is owned by the utility or that unit is specifically identified in a power contract.

Transmission loss correction factor questions

28. What is the transmission loss correction factor?

DEQ assigns a 2 percent transmission loss correction factor for any power not measured at a busbar. "Transmission loss correction factor" means the correction to account for transmission losses between the busbar and receipt. "Busbar" means a power conduit of a facility with electricity generating units that serves as the starting point for the electricity transmission system.

29. We already factor in transmission losses, but we don't measure at the busbar. How do we report this in Your DEQ Online?

You don't need to apply a transmission loss factor if it is already included in the reported data. In Your DEQ Online, report this power as measured at the busbar.

30. My utility measures power at a busbar, but then subtracts specified sales and power delivered to other states. Is it still correct to report that the final amount was measured at a busbar?

Yes, it is correct to report this power as measured at the busbar since the initial reading was done at a busbar and specified sales were subtracted from that reading. This is in line with DEQ's rule for reporting megawatt-hours (MWh). Report only power delivered to end-users in Oregon.

31. When reporting purchases, do I report to DEQ the amount of MWh I purchased or received?

DEQ requires utilities to report the emissions associated with the electricity served to end-users in Oregon. Where the amount of MWh of power purchased/generated from the source is known, you should report the amount purchased/generated, even if the amount you receive is lower due to line loss.

For example, if you purchase 100 MWh from BPA, but only receive 98 MWh (2 MWh line loss), then you would still report 100 MWh for that purchase to DEQ. This is required for accurate emissions accounting, as the emissions associated with that purchase need to cover all the power generated to fulfill the purchase, not just the power the utilities received.



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Multijurisdictional utilities questions

32. What is a multijurisdictional utility?

Investor-owned utilities and electricity service suppliers that serve load to retail customers in a service territory that is partially located in Oregon and at least one other state should report to DEQ using the multi-jurisdictional approach.

33. What approach do multijurisdictional utilities use to calculate emissions?

Unlike non-multijurisdictional utilities, multijurisdictional utilities report the megawatt-hours of wholesale electricity generated or purchased that was in the utility's service territory or power system, both within and outside of Oregon, for the previous emissions year. Multijurisdictional utilities should also report wholesale power sales from specified sources, and retail sales to Oregon's portion of the utility's service territory or power system.

DEQ will calculate a multijurisdictional utility system emission factor using equation 340-215-0120(6)(b), by dividing the sum of total system emissions metric tons of carbon dioxide equivalent (MTCO₂e) by the sum of total system net generation (megawatt-hours, MWh) for electricity serviced both within and outside of Oregon. To determine total reported emissions, this system emission factor is then applied to the MWh of power served to end-users in Oregon.

34. How many decimal places is used in the system emission factor?

In years 2010-2019, the system emission factor was applied to Oregon Total Retail Sales at three decimal places. In 2020, when reporting switched to submission through YDO, all decimals are used of the system emission factor are applied.

35. Do I include transmission losses in the Oregon Total Retail Sales field of Your DEQ Online?

Yes.

Consumer-owned utility and third-party reporter questions

36. I am a consumer-owned utility. Can a third party report on my behalf?

In accordance with OAR 340-215-0120 (3) &(4), a third party may submit an electricity supplier registration and emissions data report on behalf of a consumer-owned utility to DEQ, provided that the report contains all information required under OAR Division 215. Currently, only two third parties report to DEQ on behalf of consumer-owned utilities – Bonneville Power Administration (BPA) and PNGC Power.

BPA customers, note that consumer-owned utilities must serve load exclusively in Oregon and only receive electricity from BPA in order to designate BPA as a third party reporter to DEQ. A consumer-owned utility that serves load in Oregon **and** outside the State, or purchases other federal resources, must report directly to DEQ.

37. How do I designate a third party to report on my behalf?

The consumer-owned utility must notify DEQ (GHGReport@deq.state.or.us) at least 30 days prior to the reporting deadline that a third party will be reporting on their behalf. DEQ will send you a form to officially designate your third party reporter. This notification may include notice that the third-party will report on behalf of the consumer-owned utility for future years. If there is a change in third party reporting designation, the



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consumer-owned utility will provide notification to DEQ at least 30 days prior to the reporting deadline.

Note that entities that designate a third party to report on their behalf will not have accounts or access to information in Your DEQ Online. Consumer-owned utilities that designate a third party to report on their behalf should contact their designated third party directly to verify information and data reported on your behalf.



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38. I am a consumer-owned utility that serves load inside Oregon and also another state. Do I report power supplied to my entire service territory to DEQ?

No, if you are a consumer-owned utility, only report power supplied to end-users in Oregon.

39. I am a consumer-owned utility that received a financial credit from Bonneville Power Administration (BPA) for power from non-federal sources. Can I designate BPA to report on my behalf?

No, consumer-owned utilities (COUs) that receive power from sources other than Bonneville Power Administration do not meet the eligibility requirements outlined in OAR 340-215-0120(3) to designate BPA to report on their behalf. These COUs must annually report greenhouse gas emissions directly to DEQ.

Any COU that has any MWh in their Regional Dialogue Contract Exhibit A Section 5 Total Dedicated Resource Amounts during the reporting period is not eligible for BPA third party GHG reporting. Financial arrangements between BPA and the COU (Resource Remarketing Service, New Resources Energy Shaping Service) do not alter the reporting eligibility.

In cases where BPA provides a financial credit to a COU for power from a non-federal source, the generation from these outside sources offsets the COU's preference power purchase obligation from BPA. The power from the non-federal source is not incorporated into BPA's system mix.

In this situation, even though a financial credit was received from BPA, the COU should report the full load of power from the non-federal source directly to DEQ, and subtract any amount of power not served to load from the BPA preference power total. Contact the GHG Reporting Office Staff (GHGReport@deq.state.or.us) should you need help determining how to report.

Asset-controlling suppliers questions

40. What is an asset-controlling supplier?

“Asset-controlling supplier” or “ACS” means a person that owns or operates inter-connected electricity generating facilities or has exclusive rights to claim electricity from these facilities even though it does not own them, and that has been designated by DEQ as an asset-controlling supplier under OAR 340-215-0120(7) and received a DEQ-published emission factor. Asset controlling suppliers are specified sources.

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41. What is the process for an entity to be approved as an ACS by DEQ?

Annually, electricity entities seeking ACS designation, or renewing designation, must submit an ACS application with required data elements, including emission data from the previous calendar year (Jan. 1 to Dec. 31), by the reporting deadline of the following year.

To apply to be an asset-controlling supplier, read the ACS protocol posted on the “Greenhouse Gas Reporting Program Resources and Forms” [webpage](#), and request an application form by emailing GHGReport@deq.state.or.us.



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42. Who is considered an ACS for reporting 2020 emissions data?

Currently, only Bonneville Power Administration receives an ACS method-calculated emission factor. All other specified sources of power do not receive an ACS emission factor. For example, Powerex is not currently an ACS approved by Oregon DEQ, and purchases from this entity should be treated as unspecified power (emission factor 0.428 MTCO_{2e}) for 2020 emissions data reporting.

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Submitted data questions

43. What happens to my reported data?

Greenhouse Gas Reporting Program staff review your submitted data for accuracy and may communicate with you for any questions, clarifications, or revisions. You will receive an automated email from Your DEQ Online when your data has been accepted by DEQ. Once the data audit is complete, emissions and megawatt-hour (MWh) data are posted at the utility level on the “Greenhouse Gas Emissions Reported to DEQ” [webpage](#). DEQ may provide more detailed data in response to data requests from interested agencies, modelers, or policy teams.

44. Is my submitted data accessible to the public?

Electricity supplier Greenhouse Gas Reporting data submitted to DEQ through Your DEQ Online is not viewable from this platform by the public. However, DEQ may release submitted greenhouse gas emissions data and information in response to a public records request.

Reporting corrections questions

45. What is an electricity generating facility from which I purchased or generated power from is missing from Your DEQ Online or the information about the facility looks incorrect?

For any facility for which the emission factor looks inaccurate, or a facility is missing from Your DEQ Online, please contact us as soon as possible (GHGReport@deq.state.or.us). Note that the name of a facility may change slightly from the name submitted based on the facility’s name in other publically available datasets (e.g., Environmental Protection Agency or Energy Information Administration).

If you believe you have more accurate facility-specific emissions and net generation data, specifically for those facilities for which we used the fleet median methodology, you may propose anthropogenic and biogenic emission factors expressed as metric tons of carbon dioxide equivalent (MTCO_{2e}) per megawatt-hour (MWh) of generation. Such a proposal to DEQ must include documentation describing how the proposed facility-specific emission factors are derived, including the necessary information for verification of these

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calculations. DEQ may adopt the proposed emission factors or may develop and assign facility-specific emission factors for the specified source. You may use such an emission factor only if approved by DEQ.



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46. How are errors to submitted data revised?

If Greenhouse Gas Reporting Staff identify any issues with your submitted reports, or if you discover an error in submitted data, communications about the revisions will occur outside of the Your DEQ Online system. If revisions are required, Greenhouse Gas Reporting Staff will provide you instructions on how to revise your report through Your DEQ Online. Corrections must be made within 45 days of discovery.

Additional information

Greenhouse Gas Reporting Program Rules:

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=1538>

Greenhouse Gas Reporting Program protocols, user guides, and reporting forms:

<https://www.oregon.gov/deq/aq/programs/Pages/GHG-Reporting.aspx>

Greenhouse Gas Reporting Program training materials:

<https://www.oregon.gov/deq/aq/programs/Pages/ghg-training.aspx>

Your DEQ Online Help:

<https://www.oregon.gov/deq/Permits/Pages/Your-DEQ-Online-Help.aspx>

Contact Us

For assistance with reporting, please email GHGReport@deq.state.or.us. Sector-specific program contact information is available on our "Program Contacts" [webpage](#).

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.

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