

**Reporting Requirements Committee Meeting Virtual Meeting  
May 20, 2021 10:00am –12:00pm (2 Hours)  
1325 G Street, N.W., Suite 800  
Washington, D.C. 20005**



**IN THE MATTER OF THE IMPLEMENTATION OF THE 2019 CLEAN  
ENERGY DC OMNIBUS ACT COMPLIANCE REQUIREMENTS**

**REPORTING REQUIREMENTS COMMITTEE MEETING VIRTUAL MEETING**

**Meeting Commencement**

Following establishment and several meetings of the Clean Energy Act Implementation Working Group (“CEAI WG”) in Commission Docket GD2019-04-M, the WG was divided into three committees, the Metrics Committee, the BCA Framework Committee, and the Reporting Requirements Committee.

**Attendees**

Jeremy Hagemeyer (WGL)  
Andrea Harper (Pepco)  
Holly Reuter (TCG)  
Isabella Cotrupi (PSC)  
Dennis Jamouneau (Pepco)  
Alex Fisher (DOEE)  
Matthew Mercogliano (PSC)  
Edward Yim (DOEE)  
Christopher Lundt (PSC)  
Sarah Kogel-Smucker (OPC)  
John Friedman (WGL)  
Roger Fujihara (PSC)  
Richard Herskovitz (PSC)  
Ethan Holmes (Pepco)  
Grace Hu (PSC)  
Kevin Carey (AOBA)  
Merancia Noelsaint (PSC)  
Cathy Thurston-Seignious (WGL)  
Dr. Elizabeth A. Stanton (AEC)  
Eliandro Tavares (AEC)  
Sagal Alisalad (AEC)

## **Issues Discussed**

- **DOEE – Discussion around DOEE’s emission inventory collection process.**
- **DC OPC – Discussion around survey responses and revisiting issues discussed in the previous meeting.**
- **General Q&A**

## **Synopsis of Issues Discussed**

- DOEE discussed the District’s method of accounting for emissions in its inventory along with what is and is not included in accounting. DOEE described the inventory as a high-level picture of the District’s emissions. This inventory is one of many tools used to assess the performance of the District’s greenhouse gas reduction protocols. The inventory is backward looking only (no projections, no trends). The inventory only accounts for emissions DOEE can compile based on the data shared with them.
- DOEE described the three-scope system used in the inventory to categorize emissions. Scope 1 includes onsite activities (e.g., manufacturing/power plants/coal mine within the geographic boundary) which the District has virtually none of, but DOEE tracks. Scope 2 includes indirect emissions associated with fuels bought by residents, businesses, and government operations (including composition of fuels and any fugitive emissions). Scope 3 tracks indirect emissions associated with products (embodied emissions). DOEE does not yet have an established method for tracking Scope 3 emissions so they are not included in the inventory. DOEE clarified that fugitive emissions (natural gas that escapes in the process of extraction, processing, transmission, and delivery to end use, a form of upstream emissions) are part of Scope 2 emission and can be accounted for in the District’s emission inventory. DOEE does not include Scope 3 (embodied emissions) but is exploring the possibility of inclusion.
- DOEE described the two types of emission inventory methods it uses: location-based and market-based. Location (or grid) based emissions are associated with a particular balancing authority. Market-based emissions are estimates based on financial instruments (e.g., PPAs, REC purchases and other energy contracts) that can determine the carbon content in the District’s grid. DOEE uses both inventory methods concurrently.
- OPC brought up issues previously discussed around the feasibility of collecting and reporting accurate upstream emissions values for natural gas-powered electricity, which WGL and Pepco had stated would not be feasible. OPC asked if WGL or Pepco had feedback on DOEE’s comments regarding upstream emission reporting. To clarify, DOEE restated that emissions from the transmission of natural gas are captured in Scope 2 of the District’s emission inventory, but not the embodied carbon from the production of consumer goods and services. WGL responded by saying its stance on upstream emission reporting is unchanged. Pepco stated that it does not collect data on transmission line loss. Regarding distribution line losses, Pepco clarified that it would need to hire a special consultant to collect those data because they are not readily available. WGL clarified that it does not support the collection of any upstream emissions, not just consumer goods, because it does not see a fair and accurate way to collect these data.
- Pepco asked DOEE to define fugitive emissions, and DOEE provided the following working definition: natural gas that escapes in the process of its delivery to end use. Fugitive emissions are released in the extraction, processing, transmission and distribution phases depending on the conditions of the pipe and other equipment. DOEE mentioned that EPA has created a

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comprehensive high-level assumption for how much fugitive gas escapes, but many studies show the amount of gas leaked has a high variance depending on the leak and area of origin.

- AEC asked DOEE to clarify whether its recommendation was that fugitive gas emissions be collected for both heating and electricity which DOEE confirmed, describing it as fair. DOEE also clarified to WGL that emissions from the production of coal-fired electricity are also collected.
- DC PSC Staff asked WGL if it has data available on fugitive gas emissions as described by DOEE which WGL agreed to provide to the working group.
- AEC asked DOEE if it has data or information that could be used to estimate the fugitive emissions that the District is responsible for. DOEE confirmed this, explaining that it has a methane estimator tool that was developed for the District along with three other cities, and DOEE would be happy to share this tool.
- OPC wanted to revisit the discussion around gas leak data collection and referenced WGL statements on gas leak quantity data being difficult to collect or accurately estimate. OPC described the possibility of recording the amount of time of the leakage, size of the leak point, and size of the pipeline to come to a reasonable estimation of gas leakage. WGL responded by reaffirming its previous comments and its unchanged position on gas leak quantity reporting.
- OPC raised the issue of data granularity and what would be useful for equity metrics. DOEE clarified that its emissions inventory is very high level because it is only used for the District's energy system. AEC explained that feeder data or data by census tract could be translated if provided with a map of feeders or geographical units of some sort.
- Pepco mentioned the separation between its energy demand data and billing data. These data are not collected in the same database and would require extensive work to merge. AEC asked for clarification on how those two datasets could be separate if energy use information is necessary to determine billing, and WGL restated that the two measures are tracked differently. Pepco further clarified that the information technology work required to correlate the billing and operations databases would require significant effort and could not be implemented until after Pepco's current billing system upgrades are complete.
- Pepco clarified its desire to have ongoing discussion about how it can address equity issues and how to account for those issues, which AEC, DOEE and PSC agreed with and tabled for a future meeting which would include equity stakeholders.
- AEC asked Pepco to clarify its limitations to collecting data on losses. Pepco clarified that it does not regularly collect loss data. Pepco hires an outside consultant every few years to assess distribution losses, and that it does not have access to any PJM transmission loss data
- OPC raised a survey response from Sierra Club about the possibility of a dashboard. Sierra Club representatives were not present at the meeting and so could not clarify the details of the dashboard or who would be responsible for it. Pepco had several concerns about a dashboard including how it could be updated regularly. Pepco referred the group to the Power Path DC in Customer Impact working group discussions. AEC described a use of the term "dashboard" that would be less labor and data intensive. OPC, AEC, and Pepco all agree that this discussion should be had with Sierra Club so its description of a dashboard could be clarified.

**Next Steps**

- Set date and agendas for next meeting
- Compiling and circulating survey responses (AEC)

- Meeting minutes