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Vicky La
Financial Instruments Branch - Policy Unit
77 Wellesley Street West
Toronto ON M7A2T5

Dear Ms. La

The Canadian Energy Pipeline Association (CEPA) would like to thank the Ontario Government for the opportunity to provide comments on the proposed changes to greenhouse gas (GHG) reporting in the province. CEPA remains supportive of the Government's intention to reduce greenhouse gas emissions from industry while addressing the unique circumstances of Ontario's industrial sectors. With respect to the proposed changes to reporting requirements, we are encouraged by the attention that has been placed on reducing unnecessary costs and regulatory burden on industry. We acknowledge the complexity of this challenging task and look forward to working with the government and other stakeholders on developing practical and innovative solutions.

CEPA and its members have reviewed the proposed changes to GHG reporting and offer the following comments in the below table.

Section	Comments
Overall Feedback	The OBPS references 2017 GHG quantification methodology while 2018 methodology has been referenced in the harmonization document. We recommend following the OBPS methodology reference.
2. Definitions	The definition of "facility" reads as "the portion of a natural gas pipeline system within Ontario that is used to transmit processed natural gas and that is upstream of a metering station." We request clarification regarding how this definition would apply to 'delivery' to a meter station.
6.3 Electricity Generation, Useful Thermal Energy Transferred, Cogeneration Production Parameters	CEPA suggests referencing the EPS Methodology.
6.4 Energy Use and Mobile Equipment Production Parameters	ON.20 references other reporting units. We request e3m3 be included for natural gas as a unit option.



	ON.20 lists units energy content of natural gas in MJ. We recommend the reporting units remain the same or have MJ units as an option.
ON.40 Electricity and Heat Generation	<p>The proposed activity definition in the regulation reads as "electricity and heat generation" meaning the operation of any combustion device that combusts solid, liquid or gaseous fuels for the purpose of generating electricity or useful heat or steam, excluding the operation of portable or emergency generators with a nameplate capacity less than 50 kilowatts or that generate less than 2 MWh in a year.</p> <p>As written, this definition captures APUs and PPUs which are part of the pipeline transmission sector. Reporting generated electricity for those units is not possible.</p>
ON.43 Calculation of Greenhouse Gas Emissions	As CEMS is described in ON.20, we suggest referencing it in this section to provide additional clarity.
ON.45 Procedures for Estimating Missing Data	There is a difference between the two cited sources in section 6.7 and ON.45 – the GGQR method 7E is missing direction when $R = 0.1$. We recommend using the method that aligns with the OBPS for estimating missing data.
ON.20 Fuel Combustion and Flaring	"On-Site Transportation Emissions" is defined as releases from machinery used for the transport or movement of substances, materials, equipment or products that are used in the production process at an integrated facility. This includes releases from vehicles without public road licenses. We recommend clarifying that licensed road vehicles are excluded.
ON.23 Calculation of CO ₂ Emissions	The federal OBPS refers to WCI.353(d) while Ontario uses the GHGRP. In the OBPS, both combusted and non-combusted emissions are included whereas in Ontario, only combusted emissions are included with a different combustion equation from OBPS. We recommend using the method that aligns with the OBPS for estimating flaring emissions.
ON.24 Calculation of CH ₄ and N ₂ O Emissions	<p>In the regulation it is noted:</p> <p>(c) The person may elect to use engineering estimates to calculate the annual CH₄ and N₂O emissions for fuels that are</p>



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	<p>not listed in the tables in Section 2.B (e.g., Tables 2-7 through 2-11) of the GGQR.</p> <p>We recommend removing the brackets and e.g. of Section 2.B (e.g., Tables 2-7 through 2-11) for clarity as that changes from the presumed intended description of the calculation.</p>
Section 350 describes method for reporting flares using WCI method.	We request using the method that aligns with the OBPS for estimating flaring emissions.

Closing

Once again, we thank you for the opportunity to comment on the proposed changes to greenhouse gas (GHG) reporting in Ontario and support the government's efforts to reduce the regulatory burden on industry. Along with our members, CEPA looks forward to continuing our participation in future consultation opportunities with the Ontario Government and other stakeholders. Please do not hesitate to contact the undersigned if you have any questions or require clarification regarding any of the comments made above.

Yours sincerely,

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