

OREGON CARBON POLICY OFFICE

Oregon Climate Action Program – Potentially Covered Entities

The following tables show entities that have the potential to be covered by the greenhouse gas (GHG) cap and trade program as currently proposed by the Oregon Climate Action Program. The tables show emissions reported to the Oregon Department of Environmental Quality (DEQ) under the mandatory greenhouse gas reporting requirement for the 2017 emissions year. Please note important assumptions and caveats described in advance of each of the tables.

Natural Gas

Natural gas pipelines and utilities annually report to DEQ the total volume of natural gas imported and supplied to end users in Oregon. The table below lists the total volume of natural gas reported in 2017 and the associated emissions from the combustion of that gas in metric tons of carbon dioxide equivalent (MTCO₂e). The Oregon Climate Action Program will cover all GHG emissions from natural gas combustion at different types of entities, depending on how the gas is being brought into the state and the type of entity that uses the gas. Natural gas combustion at a large facility will generate a compliance obligation at the facility level (see separate section below), leaving the remaining emissions from natural gas covered at the gas utility or marketer supplying the gas.

Quantity and emissions reported by natural gas suppliers

Natural Gas Supplier	Quantity (Mscf)	Emissions (MTCO ₂ e)
Marketers or Large Facilities	169,889,941	9,415,024
Avista Utilities	8,625,214	470,038
Cascade Natural Gas	8,265,845	472,406
Northwest Natural Gas	69,929,402	3,998,978
Total	256,710,402	14,356,446

Electricity

The Oregon Climate Action Program will cover emissions from electricity generated in Oregon as well as emissions from imported electricity serving Oregonians. Electricity generated at facilities in Oregon will be covered at the electricity generation facility. Emissions from imported electricity shown in this section will be covered at the supplier level. The tables below include emissions reported to DEQ from in-state power plants and emissions associated with imported electricity provided to Oregon ratepayers in 2017.

Emissions from electricity generated in Oregon

Facility Name	County	Natural Gas (MTCO ₂ e)	Coal (MTCO ₂ e)	Total Emissions
Portland General Electric Company (Carty & Boardman)	Morrow	902,884	1,713,337	2,616,221
Hermiston Power LLC	Umatilla	1,175,627	-	1,175,627
Portland General Electric Company (Coyote Springs)	Morrow	1,096,407	-	1,096,407
Portland General Electric Company (Beaver/Port Westward)	Columbia	1,008,157	-	1,008,157
Klamath Energy LLC	Klamath	955,631	-	955,631
Hermiston Generating Company, L.P.	Umatilla	719,622	-	719,622
Portland General Electric (Port Westward II)	Columbia	104,700	-	104,700
Total		5,963,028	1,713,337	7,676,365

Emissions from imported power serving Oregon

Investor Owned Utility	Emissions from Specified Imported Power (MTCO₂e)	Emissions from Unspecified Power (MTCO₂e)	Total
Idaho Power Company	177,434	11,337	188,770
Pacific Power (PacifiCorp)	7,905,163	630,209	8,535,373
Portland General Electric (PGE)	2,378,292	645,584	3,023,876
Total	10,460,889	1,287,130	11,748,019

Consumer Owned Utility*	Emissions from Specified Imported Power (MTCO₂e)	Emissions from Unspecified Power (MTCO₂e)	Total
Emerald PUD	293	54,893	55,186
PNGC Power (on behalf of Umatilla Electric Cooperative)	25,341	-	25,341
Total	25,634	54,893	80,527

* In line with the design of the Oregon Climate Action Program, this only shows COUs (or entities scheduling imported power on their behalf) with 25,000 MTCO₂e or more in 2017.

Bonneville Power Administration	Emissions from Specified Imported Power (MTCO₂e)	Emissions from Unspecified Power (MTCO₂e)	Total
Bonneville Power Administration	-	129,426	129,426

Electricity Service Supplier	Emissions from Specified Imported Power (MTCO₂e)	Emissions from Unspecified Power (MTCO₂e)	Total
Avangrid Renewables	-	5,599	5,599
Calpine Energy Solutions	-	576,749	576,749
Constellation New Energy	-	119,777	119,777
Shell Energy North America	14,648	-	14,648
Total	14,648	702,126	716,774

Imported Fossil Fuels

The Oregon Climate Action Program will cover companies that own fossil fuel as it is imported into Oregon. The table below lists the anthropogenic emissions from the combustion of the total volume of fuel, excluding aviation fuel, reported to DEQ for 2017 for all companies importing at least 500,000 gallons of fuel.

Emissions reported from fuel imported into Oregon

Fuel Supplier	Emissions (MTCO ₂ e)
BP West Coast Products LLC	4,877,349
Phillips 66 Company	4,174,735
Tesoro Refining And Marketing Company LLC	3,633,597
Shell Oil Products Us	3,441,869
Chevron Usa Inc.	2,759,872
Space Age Fuel Inc.	1,643,562
Vitol Inc	1,626,575
Mccall Oil & Chemical Corp	216,928
PC Energy, LLC	185,898
Shell Trading (US) Company	159,938
Mieco Inc.	119,573
Byrnes Oil Company, Inc.	114,835
Hattenhauer Distributing Company	106,784
Plains Midstream Canada Ulc	99,999
Ed Staub and Sons Petroleum, Inc.	97,820
Valero Marketing And Supply Co.	84,274
Apex Oil Company, Inc.	80,409
Amerigas Propane, Inc.	78,286
Campo & Poole Distributing, LLC	58,096
Jacksons Food Stores, Inc.	55,724
Carson Oil Company, Inc.	53,672
SeSequential-Pacific Biodiesel, LLC	53,290
A & B Enterprises, Inc.	49,931
Devin Oil Co., Inc.	49,401
Kiva Energy, Inc.	45,186
Wilson Oil dba Wilcox & Flegel	44,446
Powell-Christensen Inc	43,466
Heller & Sons Dist Inc	41,765
Musket Corporation	41,281
Colvin Oil I, LLC	39,924
Elbow River Marketing Ltd., A Corporation Of Canada	36,300
Associated Petroleum Products	29,596
Suburban Propane, L.P.	27,452
Farmers Supply Cooperative	27,067
Jubitz Corporation	25,222
CHS Inc. Of Minnesota	24,136
AH Schade, Inc.	23,368
Tyree Oil, Inc.	18,943
Marc Nelson Oil Products, Inc.	18,150
Petrogas, Inc.	17,858

Fuel Supplier	Emissions (MTCO2e)
Maverik Inc.	17,204
Truax Corporation	16,888
Hicksgas, LLC	16,565
Conrad & Bischoff, Inc.	15,113
WSCO Petroleum	14,628
Morrow County Grain Growers, Inc.	14,277
Coleman Oil Company	14,095
ARS Fresno LLC	11,542
Connell Oil, Inc.	9,843
Pounder Oil Service, Inc.	9,514
Pratum Co-Op	8,819
UPS Fuel Services, Inc.	8,774
Quality Petroleum Products, Inc.	8,769
Hartland Fuel Products, LLC	7,726
PacWest Energy LLC	7,529
Mid Columbia Producers Inc	7,112
Franklin United Inc	6,423
Total	24,521,398

Permitted Facilities

The Oregon Climate Action Program will cover emissions from facilities with air quality permits annually emitting over 25,000 MTCO₂e from onsite natural gas use, certain industrial processes and fugitive emissions associated with certain onsite operations. This table does not include emissions from fuels that are covered by the fuel suppliers listed in the previous section (e.g. onsite use of distillate fuel in a boiler) or CO₂ emissions from biogenic fuels such as wood waste or biogas. Thus, emissions listed below are different from emissions listed on DEQ's emissions webpage. It is important to note that:

- For facilities such as those listed below that will be covered directly for onsite natural gas use, their natural gas emissions will be subtracted from the natural gas emissions listed in the natural gas table shown above in this document to prevent double counting.
 - The emission shown above in the natural gas category include the natural gas emissions listed below, so there is double counting of gas listed in these two sections. This is not how the Oregon Climate Action Program will work – it will remove the compliance obligation from natural gas suppliers for the gas they supply to directly covered industrial facilities.
- Emissions data listed does not include fluorinated greenhouse gases from semiconductor manufacturing.
- In the case of multiple NAICS codes, the primary (first listed) code has been used for the listed industry type.

Facility Name	County	NAICS	Industry Type	Natural Gas Emissions (MTCO ₂ e)	Industrial Processes or Landfill gas (MTCO ₂ e)	Total Emissions Potentially Covered (MTCO ₂ e)	Potentially Emissions Intensive Trade Exposed (EITE)*
Ash Grove Cement Company	Baker	327310, 212312	Cement Manufacturing	87,500	628,306	715,806	EITE
Georgia-Pacific Toledo LLC	Lincoln	322130, 221330	Paperboard Mills	308,688	27,833	336,521	EITE
Georgia-Pacific Consumer Operations LLC*	Clatsop	322121, 322130, 221330	Paper (except Newsprint) Mills	231,047	25,411	256,457	EITE
Dyno Nobel Incorporated	Columbia	325188, 325311, 22133	Inorganic Chemical Manufacturing	84,363	113,912	198,275	EITE
Waste Management Disposal Services of Oregon, Inc. (Columbia Ridge Landfill)	Gilliam	562212, 221117	Solid Waste Landfill	-	160,586	160,586	
Lane Co Short Mountain Landfill	Lane	562212	Solid Waste Landfill	-	146,630	146,630	
Intel Corporation	Washington	334413	Semiconductor and Related Device Manufacturing	71,838	44,182	116,020	EITE
International Paper - Springfield	Lane	322130	Paperboard Mills	110,893	1,022	111,915	EITE
EVRAZ Inc. NA	Multnomah	331221, 324199, 331110, 331112, 332811	Rolled Steel Shape Manufacturing	95,586	-	95,586	EITE

Facility Name	County	NAICS	Industry Type	Natural Gas Emissions (MTCO2e)	Industrial Processes or Landfill gas (MTCO2e)	Total Emissions Potentially Covered (MTCO2e)	Potentially Emissions Intensive Trade Exposed (EITE)*
Dry Creek Landfill, Inc.	Jackson	562212	Solid Waste Landfill	-	88,962	88,962	
Wasco County Landfill, Inc. (Waste Connections)	Wasco	562212	Solid Waste Landfill	-	79,486	79,486	
Finley Buttes Landfill Company	Morrow	562212	Solid Waste Landfill	-	74,448	74,448	
Covanta Marion, Inc.	Marion	562213	Solid Waste Combustors and Incinerators	1,621	72,804	74,424	
Cascade Steel Rolling Mills, Inc.	Yamhill	331110	Iron and Steel Mills and Ferroalloy Manufacturing	43,275	29,477	72,752	EITE
Riverbend Landfill Co.	Yamhill	562212, 221118	Solid Waste Landfill	-	72,057	72,057	
Deschutes County Dept. of Solid Waste (Knott Landfill)	Deschutes	562212, 562213	Solid Waste Landfill	-	69,342	69,342	
Gas Transmission Northwest LLC	Morrow	486210	Pipeline Transportation of Natural Gas	23,221	40,349	63,571	
Gas Transmission Northwest LLC	Deschutes	486210	Pipeline Transportation of Natural Gas	58,848	1,579	60,427	
Cascade Pacific Pulp, LLC	Linn	322110, 221330	Pulp Mills	57,214	1,484	58,699	EITE
Gas Transmission Northwest LLC	Sherman	486210	Pipeline Transportation of Natural Gas	52,463	1,399	53,862	
Cascades Tissue Group-Oregon	Columbia	322121, 221330	Paper (except Newsprint) Mills	52,141	-	52,141	EITE
Gas Transmission Northwest LLC	Klamath	486210	Pipeline Transportation of Natural Gas	50,909	819	51,728	
United States Gypsum Company	Columbia	327420	Gypsum Product Manufacturing	42,882	-	42,882	EITE
Oregon Potato Company	Morrow	311423, 221330	Dried and Dehydrated Food Manufacturing	42,728	-	42,728	EITE
Kraft Heinz Foods Company	Malheur	311411, 221330, 311412	Frozen Fruit, Juice, and Vegetable Manufacturing	41,814	-	41,814	EITE
Owens-Brockway Glass Container Inc. (Owens-Illinois)	Multnomah	327213, 221330	Glass Container Manufacturing	33,416	7,703	41,118	EITE

Facility Name	County	NAICS	Industry Type	Natural Gas Emissions (MTCO2e)	Industrial Processes or Landfill gas (MTCO2e)	Total Emissions Potentially Covered (MTCO2e)	Potentially Emissions Intensive Trade Exposed (EITE)*
Lamb Weston, Inc.	Umatilla	311412, 221330	Frozen Fruit, Juice, and Vegetable Manufacturing	38,118	-	38,118	EITE
Lamb Weston, Inc.	Morrow	311411, 221330	Frozen Fruit, Juice, and Vegetable Manufacturing	37,712	-	37,712	EITE
Douglas County Public Works Department (Roseburg Landfill)	Douglas	562212, 562211, 562213, 562219, 562920	Solid Waste Landfill	-	37,248	37,248	
Pacific Ethanol Columbia, LLC	Morrow	325193, 221330	Ethyl Alcohol Manufacturing	37,227	-	37,227	EITE
Roseburg Forest Products Co.	Douglas	321219, 221330, 321113, 321212, 321211	Reconstituted Wood Product Manufacturing	20,351	13,448	33,799	EITE
Valley Landfills, Inc. (Coffin Butte Landfill)	Benton	562212	Solid Waste Landfill	-	30,306	30,306	
Lamb Weston, Inc.	Morrow	311411, 221330	Frozen Fruit, Juice, and Vegetable Manufacturing	29,993	-	29,993	EITE
Hollingsworth & Vose Fiber Company	Benton	327993	Mineral Wool Manufacturing	28,741	1,192	29,934	EITE
EP Minerals, LLC	Malheur	212319	Other Crushed and Broken Stone Mining and Quarrying	27,351	-	27,351	EITE
Entek International LLC	Linn	326113	All Other Plastics Product Manufacturing	27,144	-	27,144	EITE
Flakeboard America Limited (Arauco)	Linn	321219, 221330	Reconstituted Wood Product Manufacturing	25,339	-	25,339	EITE
Total				1,762,423	1,769,985	3,532,408	

* Entities listed as potentially EITE are those industries that a study published December 2018 by Vivid Economics indicated could be at risk of “leakage”. Leakage refers to the potential for Oregon emissions-intensive industries to shift industrial investments and operations to jurisdictions where GHGs are not regulated