



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 15, 2019

Washington's Greenhouse Gas Reporting Program

Reporting Year 2019 Fee Schedule

Background

[Chapter 173-441-110 WAC](#) establishes the procedure the Department of Ecology (Ecology) uses to set the reporting fee for Washington's mandatory [Greenhouse Gas Reporting Program](#). This Reporting Year 2019 Fee Schedule sets the reporting fee for reports due in 2020.

Ecology adopted changes to the Greenhouse Gas Reporting Program fee provisions on September 15, 2016. Before the 2016 rule changes, all facilities and transportation fuel suppliers that were required to report or voluntarily reported their greenhouse gas emissions to Ecology were required to pay an annual reporting fee. After the 2016 rule changes, only *facilities* were required to pay the fee, while transportation fuel suppliers and voluntary reporters were exempted from the fee.

In March 2018, Thurston County Superior Court ruled that parts of the Clean Air Rule are invalid. The Superior Court's ruling prevents Ecology from implementing the Clean Air Rule regulations that cap and gradually reduce emissions of greenhouse gases from major sources of carbon pollution. The ruling also invalidated changes to the Greenhouse Gas Reporting Program, including the 2016 changes to the fee provisions.

This Reporting Year 2019 Fee Schedule conforms with the Superior Court's rulings and bases the fee on the methodology that existed before the 2016 rule changes. In addition, Ecology has determined at this time to exercise discretion and not charge a fee to transportation fuel suppliers.

Workload analysis and budget development

Statute authorizes Ecology to base the annual reporting fee on projected agency costs to administer fee-eligible activities related to the Greenhouse Gas Reporting Program ([RCW 70.94.151](#)). Ecology used a workload analysis model to project that the following activities will require approximately 3.3 Full Time Equivalent (FTE) positions in 2020 to implement the 2019 reporting year program by fulfilling the following program functions:

- Information technology maintenance and support
- Technical assistance to reporting community
- Data analysis
- Collaboration with the Environmental Protection Agency and Washington Department of Licensing
- Verification, compliance, and enforcement
- Program administration

Ecology used standardized agency cost estimates to project costs for salary and benefits of those 3.9 FTE positions. Ecology projects the total cost of administering the Greenhouse Gas Reporting Program for the 2019 emissions year to be \$524,194.

Facility reporting fee

The fee for facilities reporting greenhouse gas emissions under [WAC 173-441-120](#) after the March 2018 ruling is established by dividing 75% of the total cost for administering the program for the year¹ by the number of projected facilities reporting in that year. Ecology estimates that 151 facilities will report 2019 emissions in Calendar Year 2020. Therefore, the reporting fee for the 2019 emissions year is $(\$524,194 \times 0.75)/151 = \$2,604$ per facility.

Transportation fuel supplier reporting fee

The September 15, 2016 revisions to the rule removed the fee for transportation fuel suppliers reporting greenhouse gas emissions under [WAC 173-441-130](#). Although the March 2018 ruling indicates that Ecology may charge a fee to transportation fuel suppliers, Ecology is exercising its discretion to not charge that fee. Therefore, the reporting fee for the 2019 emissions year remains \$0 for transportation fuel suppliers.

Greenhouse Gas Reporting Program reporting year 2019 fee schedule

Greenhouse Gas Reporting Program fees for the 2019 reporting year are outlined in the table below.

Reporting Category	Fee Amount*	Reporting Deadline	Approximate Billing Date**
Facilities required to report to both Ecology and EPA	\$2,604	March 31, 2020	July 15, 2020
Facilities only required to report to Ecology	\$2,604	November 2, 2020	December 15, 2020
Facilities that choose to voluntarily report emissions and transportation fuel suppliers	\$0	November 2, 2020	NA

* If a reporter has multiple facilities, then it must pay a separate fee for each facility that reports.

** Approximate billing dates are an estimate only and subject to change. Fees must be paid within 60 days of receipt of the billing statement. A late fee surcharge of 10% will be applied to any fee received more than 90 days past the due date.

More information

More information about the Greenhouse Gas Reporting Program, including fees, who is required to report, and other information is available on [Ecology's website](#) or by contacting Emily Bruns at 360-407-6814 or ghgreporting@ecy.wa.gov.

¹ We are basing fees charged to facilities on 75% of our costs rather than 100% of our costs per the methodology established in the pre-2016 version of the rule. Ecology has determined at this time to exercise discretion and not charge the 25% fee to transportation fuel suppliers.