



## Fact Sheet

# Natural Gas Supplier Reporting Protocols Instructions for Reporting Greenhouse Gas Emissions

Updated March 2025

## Overview

Natural Gas Suppliers and in-state producers must report the greenhouse gas emissions resulting from the complete combustion or oxidation of all natural gas and biomass-derived fuel they supply to and within Oregon, as prescribed by [OAR 340-215-0115](#). This document provides additional guidance on reporting requirements for this sector, including applicability, reporting deadlines, and methodology. Entities required to report should review the greenhouse gas reporting rules to identify additional elements of the reporting program.

## Applicability

Any entity that produces natural gas, compressed natural gas, or liquefied natural gas in Oregon, or who imports, sells, or distributes natural gas to end users in Oregon is subject to Oregon's greenhouse gas reporting rules ([OAR Chapter 340 Division 215](#)). This includes, but is not limited to, in-state natural gas producers, local distribution companies, interstate pipelines, and importers of natural gas.

**In-state producers:** Any entity that refines, treats, or otherwise processes biogas into biomethane in Oregon, or is responsible for the production, extraction, recovery, lifting, stabilization, separation, or treating of natural gas from natural formations. This segment does not include removal of natural gas from underground storage facilities.

**Local Distribution Company:** A legal entity, including natural gas utilities, engaged in the retail sale and/or delivery of natural gas through a distribution system that they own or operate and that physically delivers gas to end users in Oregon.

**Interstate pipelines:** An entity that owns or operates a pipeline that delivers natural gas to Oregon across the state border. An interstate pipeline is not considered a local distribution company.

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**Importers of natural gas:** For reporting purposes, this category includes any entity that imports natural gas into Oregon by any means other than a pipeline distribution system. This category includes, but is not limited to, gas imported into the state by rail or truck.

## Reporting deadlines

The reporting deadline is March 31 for reporting emissions from the previous calendar year (Jan. 1 to Dec. 31). If the reporting deadline falls on a Saturday, Sunday, or an Oregon state observed holiday, the reporting is due the following business day.

## Reporting protocols

All natural gas suppliers and in-state producers must report:

- Total volume of natural gas delivered (Mscf) to all users, including facilities owned or operated by the natural gas supplier.
- Total energy of natural gas delivered (MMBtu) to all users
- Types of natural gas delivered
- Emissions associated with complete combustion or oxidation of all delivered natural gas (MT CO<sub>2</sub>e), utilizing the global warming potentials found in the 4th Assessment Report (AR4) of the Intergovernmental Panel on Climate Change to calculate carbon equivalency of non-CO<sub>2</sub> emissions
- Volume of natural gas delivered to each large end user, including facilities owned or operated by the natural gas supplier. Report customer information required in 40 C.F.R. 98.406(b)(12)
- Identifying information for each natural gas marketer who contracts use of their distribution system and the volume of natural gas transported for each marketer

For the purposes of this reporting, “large natural gas end users” means end users receiving equal to or greater than 460,000 Mscf of natural gas during the year.

LDCs must report greenhouse gas emissions using methodologies described in [40 C.F.R. part 98 subpart NN](#) for suppliers of natural gas and natural gas liquids. A full and complete copy of their annual EPA Greenhouse Gas Report filed for compliance with 40 C.F.R. part 98 subpart NN may be submitted to meet this requirement. All other natural gas suppliers may use calculation methodology 1 as specified in 40 C.F.R. 98.403(a)(1) to report their emissions. CH<sub>4</sub> and N<sub>2</sub>O emissions should also be calculated, using equation C-8 and table C-2 as required in 40 C.F.R. 98.33(c)(1). Oregon regulations mandate the use of the global warming potentials from the IPCC’s 4th Assessment Report (AR4) for calculating the carbon dioxide equivalency of non-CO<sub>2</sub> emissions.

To prevent double counting, volumes of gas delivered to a local distribution company in Oregon should not be reported. Emissions from gas that is exported to users outside of Oregon should also not be reported.

## Reporting biomethane, biogas, or hydrogen

Biomethane (also known as renewable natural gas) is biogas, or synthetic methane made from renewable resources, that meets pipeline quality natural gas standards. It may be injected into existing natural gas infrastructure to displace fossil natural gas and delivered by LDCs, interstate pipelines, or other natural gas suppliers through pipelines or distribution systems. Carbon dioxide emissions from biomass-derived fuels, such as biomethane, are considered biogenic. Please refer to our detailed [Biogas, biomethane and hydrogen reporting requirements document](#) for further information.

## Additional requirements

All new Natural Gas Suppliers must register with the Greenhouse gas Reporting Program in advance of the March 31 reporting deadline by completing registration for reporting in the Your DEQ Online system. Please notify us at [GHGReport@deq.oregon.gov](mailto:GHGReport@deq.oregon.gov) once you have completed your registration in the system.

## Online reporting requirements

Natural gas suppliers must report and certify emissions data using the [Your DEQ Online](#) reporting tool.

A user guide to reporting greenhouse gas emissions as a natural gas supplier is available on the [Greenhouse Gas Reporting Resources and Forms](#) page.

## Biogas, biomethane, and hydrogen online reporting

Natural gas suppliers reporting biogas, biomethane, or hydrogen must complete the required reporting form and upload that form with their annual greenhouse gas emissions report in Your DEQ Online.

## Supporting documentation

If an entity chooses to determine its own reporter-specific emission factors or high-heating values for the natural gas being supplied to Oregon, it must provide DEQ with these values and all information used to develop the reporter-specific emission factor(s) or heating value(s). It must include the specific industry standard(s) used to develop reporter specific higher heating value(s) and/or emission factors, pursuant to 40 C.F.R. 98.404(b)(2) and (c)(3). Supporting documents must be submitted as an attachment in Your DEQ Online.

## Recordkeeping requirements

Natural gas suppliers must retain DEQ greenhouse gas emission reporting records and any applicable materials as required by EPA's 40 C.F.R part 98 for a period of at least five years. Records retained must be sufficient to document and allow for verification of emissions data reported to DEQ and any later revisions. Note that natural gas suppliers that are subject to the requirements of [OAR 340-272-0120](#) (third party verification) will be required to retain records for at least seven years, beginning with data for the 2021 reporting year. Interstate pipelines are exempt from third party verification requirements.

In addition, records authenticating the purchase of any biomass-derived natural gas and documentation of any exported natural gas must be kept for the minimum five-year recordkeeping period.

## Correcting incomplete or inaccurate submitted data

If an entity identifies an error in a submission or is notified of an error in a submission, the reporter must submit a revision to correct the error within 45 calendar days of discovery. If the entity is subject to the requirements of Third-party verification, revisions must be made in compliance with OAR chapter 340, division 272.

Any entity seeking to make a revision must submit a request to amend through Your DEQ Online. Requests must include specific details about the error, how it was discovered, and what will be updated in the amendment. Only changes that are included in the request can be made to the submission. Any additional

information supporting the change that is not included in the request to amend must be uploaded as an attachment in the YDO submission in the attachments tab.

## **Circumstances under which a source can stop reporting**

Natural gas suppliers that cease to supply natural gas in Oregon are no longer required to report to DEQ if they complete all of the following: (1) submit an emissions report for the year in which they ceased to supply natural gas in Oregon, (2) retain the records required under [OAR 340-215-0042](#) for a period of five years following the last year that they were subject to reporting, and (3) notify DEQ in writing of their reason(s) for ceasing to report no later than the reporting deadline for the applicable year (March 31).

If a regulated entity undergoes a change of ownership or operational control that results in a cessation of their status as a Natural gas supplier, the following must be completed to comply with DEQ rule: (1) the new owner or operator must notify DEQ in writing of the ownership or operational control change with information as specified in OAR 340-215-0034(3)(a), (2) the person that owns or operates the regulated entity at the time of a reporting deadline (March 31) has the responsibility for complying with reporting requirements, and (3) if an ownership change takes place during the year, reported data must not be subdivided for the year. A single annual emissions data report must be submitted by the current owner or operator.

## **Greenhouse gas reporting program contacts**

For assistance with reporting please email the program at [GHGReport@deq.oregon.gov](mailto:GHGReport@deq.oregon.gov). Sector specific program contact information and phone numbers are available on our [program contacts web page](#).

## **Non-discrimination statement**

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