701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2696
Telephone 202-508-5027
Fax 202-508-5150
qshea@eei.org

www.eei.org

EDISON ELECTRIC INSTITUTE

QUINLAN J. SHEA, III
Executive Director, Environment

February 17, 2004

Via Hand Delivery

Mark Friedrichs, Esq.
Office of Policy and International Affairs
U.S. Department of Energy
Pi-40, Room 1E190
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: 10 C.F.R. Part 300, General Guidelines for Voluntary Greenhouse Gas Reporting; Proposed Rule, 68 *Fed. Reg.* 68204 (December 5, 2003)

Dear Mr. Friedrichs:

The Edison Electric Institute (EEI) appreciates the opportunity to submit the enclosed comments on the Department of Energy's (DOE) proposed General Guidelines for Voluntary Greenhouse Gas Reporting.

EEI is the association of U.S. shareholder-owned electric companies, international affiliates and industry associations worldwide. Our U.S. members serve 90 percent of all customers served by the investor-owned segment of the industry. They generate more than 70 percent of all of the electricity generated by the electric utilities in the U.S. and serve nearly 70 percent of all ultimate customers of electricity in the nation. EEI also is one of seven electric power groups, known as the Electric Power Industry Climate Initiative (EPICI), formed to coordinate the power sector's response to President Bush's Global Climate Initiative and, through the President's Climate VISION Program, support efforts to reduce U.S. greenhouse gas (GHG) emissions intensity by 18 percent by the end of 2012. Other EPICI groups include the American Public Power Association, Electric Power Supply Association, Large Public Power Council, National Rural Electric Cooperative Association, Nuclear Energy Institute, and Tennessee Valley Authority.

Since 1994, EEI and other EPICI members individually and collectively have been the major voluntary reporters of GHG reductions to the Energy Information Administration (EIA) data base maintained under the current section 1605(b) reporting program. For example, in 2001, as a result of aggressive reduction, avoidance and sequestration activities, the power sector reported more than 275 million metric tons (MMT) of GHGs out of total reported reductions of 352 MMT, or 78 percent of all reported reductions under section 1605(b).

EEI and EPICI continue to support the President's program for addressing the climate change issue, including the goal to reduce U.S. emissions intensity 18 percent by 2012, the Climate VISION program, and efforts to improve the Energy Policy Act section 1605(b) greenhouse gas data base and reporting guidelines. Further, we continue to support specific efforts detailed in the July 8, 2002 letter to the President from Secretaries Abraham, Evans and Veneman, and Administrator Whitman.

We commend the Secretary and DOE for developing this important revision and for efforts, through the May 6, 2002 notice of inquiry (67 *Fed. Reg.* 30370) and several workshops, to engage stakeholders and the general public. We appreciate the opportunity for EEI and others to present preliminary views on the proposed General Guidelines revision at the January 12, 2004 workshop and in these comments, as well as the decision by DOE to extend the deadline for comments to February 17 in light of the number of complex issues raised.

Relative to next steps, EEI emphasizes the importance of allowing an opportunity to comment on the full set of revised documents, including the General Guidelines, Technical Guidelines, and EIA forms and instructions. As many participants noted at the January 12 workshop, it is difficult to comment on certain aspects of the General Guidelines without information on the detailed procedures that will be specified in the Technical Guidelines. We appreciate DOE's stated intention to provide an opportunity to comment on the full set of documents later this year. Taken together, these changes to the review process will afford interested parties an opportunity to provide more detailed and thoughtful comments to assist DOE in its revisions to the section 1605(b) guidelines.

Notwithstanding the unavailability of the Technical Guidelines at this juncture, EEI's comments address a number of significant procedural and substantive concerns with the proposal. To reiterate, however, more specific suggestions necessarily must await issuance of the proposed Technical Guidelines.

Thank you again for the opportunity to comment on this important issue. If you have any question about EEI's submission, please contact me, William Fang (202-508-5617; bfang@eei.org) or Eric Holdsworth (202-508-5103; eholdsworth@eei.org).

Sincerely yours,

Quinlan J. Shea, III

QJS:eh
Enclosures

cc (w/ encs):
Hon. James L. Connaughton, Chairman, Council on Environmental Quality

Hon. Robert G. Card, Under Secretary for Energy, Science and Environment
Hon. Vicki A. Bailey, Assistant Secretary, Office of Policy and International Affairs
Margot Anderson, Deputy Assistant Secretary for Policy
Larisa Dobriansky, Deputy Assistant Secretary for National Energy Policy
DOE Docket: 1605bgeneralguidelines.comments@hq.doe.gov