

Exhibit Y Carbon Dioxide Emissions

Boardman to Hemingway Transmission Line Project



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Amended Preliminary Application for Site Certificate

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TABLE OF CONTENTS

1.0	INTRODUCTION.....	Y-1
2.0	APPLICABLE RULES AND AMENDED PROJECT ORDER PROVISIONS.....	Y-1
	2.1 Site Certificate Application Requirements.....	Y-1
	2.2 Amended Project Order Provisions.....	Y-1
3.0	ANALYSIS AND CONCLUSION	Y-1
	3.1 Applicability	Y-1
	3.2 Tailoring Rule	Y-2
4.0	COMPLIANCE CROSS-REFERENCES.....	Y-2

LIST OF TABLES

Table Y-1.	Compliance Requirements and Relevant Cross-References.....	Y-2
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ACRONYMS AND ABBREVIATIONS

Amended Project Order	First Amended Project Order, Regarding Statutes, Administrative Rules and Other Requirements Applicable to the Proposed Boardman to Hemingway Transmission Line (December 22, 2014)
EPA	Environmental Protection Agency
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
Project	Boardman to Hemingway Transmission Line Project

1 **Exhibit Y**
2 **Carbon Dioxide Emissions**

3 **1.0 INTRODUCTION**

4 Exhibit Y demonstrates that the application submittal requirements of the Carbon Dioxide
5 Emissions Standard, Oregon Administrative Rule (OAR) 345-021-0010(1)(y), do not apply to the
6 Boardman to Hemingway Transmission Line Project (Project).

7 **2.0 APPLICABLE RULES AND AMENDED PROJECT ORDER**
8 **PROVISIONS**

9 **2.1 Site Certificate Application Requirements**

10 OAR 345-021-0010(1)(y) provides that Exhibit Y must include the following information
11 regarding carbon dioxide emissions:

12 *If the facility is a base load gas plant, a non-base load power plant, or a nongenerating*
13 *energy facility that emits carbon dioxide, a statement of the means by which the*
14 *applicant elects to comply with the applicable carbon dioxide emissions standard under*
15 *OAR 345-024-0560, 345-024-0600, or 345-024-0630 and information, showing detailed*
16 *calculations, about the carbon dioxide emissions of the energy facility. The applicant*
17 *may present the calculations in tabular form. The applicant shall include the following*
18 *information and calculations:*

19 **2.2 Amended Project Order Provisions**

20 The Amended Project Order states that the provisions of OAR 345-021-0010(1)(y) do not apply
21 to the Project, “because the proposed facility is not a base load gas plant, a non-base load
22 power plant, or a non-generating energy facility that emits carbon dioxide.” (Amended Project
23 Order, Section III(y)). The Amended Project Order further provides:

24 *NOI states that the project will emit no pollutants during operation and does not require*
25 *air permits from the ODEQ’s federally-delegated air program. However, Exhibit BB*
26 *should address whether the May 2013 “Tailoring Rule” promulgated by the EPA applies*
27 *to the emissions of greenhouse gases (including sulfur hexafluoride) from facility*
28 *components. If so, provide evidence that emission sources included in the proposed*
29 *facility do not exceed permitting thresholds.*

30 (Amended Project Order, Section III(y)).

31 **3.0 ANALYSIS AND CONCLUSION**

32 **3.1 Applicability**

33 As set forth in the Amended Project Order, the Project does not include a base load gas plant,
34 does not include a non-base load power plant, and will not emit carbon dioxide. Therefore, OAR
35 345-021-0010(1)(y) is not applicable to the Project, and Exhibit Y does not need to include the
36 carbon dioxide emissions information provide for in that rule.

1 **3.2 Tailoring Rule**

2 The Tailoring Rule and its application to the Project are discussed in Exhibit BB.

3 **4.0 COMPLIANCE CROSS-REFERENCES**

4 Table Y-1 identifies the location within the application for site certificate of the information
5 responsive to the application submittal requirements in OAR 345-021-0010(1)(y).

6 **Table Y-1. Compliance Requirements and Relevant Cross-References**

Requirement	Location
OAR 345-021-0010(1)	
(y) Exhibit Y. If the facility is a base load gas plant, a non-base load power plant, or a nongenerating energy facility that emits carbon dioxide, a statement of the means by which the applicant elects to comply with the applicable carbon dioxide emissions standard under OAR 345-024-0560, 345-024-0600, or 345-024-0630 and information, showing detailed calculations, about the carbon dioxide emissions of the energy facility. The applicant may present the calculations in tabular form. The applicant shall include the following information and calculations:	Exhibit Y, Section 3
Amended Project Order	
NOI states that the project will emit no pollutants during operation and does not require air permits from the ODEQ's federally-delegated air program. However, Exhibit BB should address whether the May 2013 "Tailoring Rule" promulgated by the EPA applies to the emissions of greenhouse gases (including sulfur hexafluoride) from facility components. If so, provide evidence that emission sources included in the proposed facility do not exceed permitting thresholds.	Exhibit BB Section 3.1