Establishing a Framework for a Greenhouse Gas Reporting Program

Memo Overview

Vermont Climate Council

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AGENCY OF NATURAL RESOURCES

Context

The CAP includes the following request to ANR as part of a multi-step recommendation on joining a cap-and-invest program:

Develop a framework for the reporting of greenhouse gas emissions data from fuel suppliers and other significant emitters of climate pollution. ANR will work expeditiously to put a reporting framework in place and recommend to the Legislature by December 15, 2025, statutory changes and funding needed to support streamlined reporting requirements and a stepped implementation plan.

This memo presents our recommended framework.

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Recommendation

ANR analyzed the two reporting frameworks below.

Harmonization

ANR staff compiling and reconciling various types of data collected by other departments.

Standalone Reporting Rule

Covered entities reporting GHG emissions data directly to ANR.

We believe that the adoption of standalone reporting rule is most appropriate for Vermont.

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Recommendation

A standalone reporting rule would allow ANR to:

- Define, collect, and analyze sufficient data to develop a robust estimate of statewide emissions from covered sectors.
- Expand the scope of the reporting program to additional sectors if deemed appropriate for future mitigation activities.
- Decrease ANR's reliance on federal datasets, as federal data reporting requirements are rolled back.

While ANR has general legal authority to require reporting of GHGs, it is important that the General Assembly **specifically authorize ANR to create a comprehensive GHG reporting program** that covers all sources of emissions and **ensure adequate resourcing.**

Resource Needs

Adequately resourcing this effort is critical.

Task	Program Establishment & Management	Platform Development & Maintenance	Data Analysis & Verification	Compliance & Enforcement	Totals
Staff Time (FTEs)	1 FTE	0.25 FTE	0.25 FTE	0.5 FTE	2 FTEs = $300,000 Base funding increase
One-time Costs	N/A	$300,000 for platform development	N/A	N/A	$300,000 One-time
Ongoing Annual Costs	N/A	$100,000 for platform maintenance each reporting year	$100,000 for third-party verification each reporting year	N/A	$200,000 Base funding increase

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Program Scope

At minimum, the program should cover the transportation and the residential, commercial, and industrial (RCI) sectors.

- Together, transportation and RCI represent 70% of statewide GHG emissions.
- Covered entities would be suppliers of transportation and heating fuels.
- Further questions include whether to incorporate non-energy industrial process emissions and/or voluntary reporting in other sectors.
- Conversations on scope should continue as the Legislature considers the opportunity.

Appendices

Appendix A: Supplemental Tables

- State GHG Reporting Programs
- Vermont GHG Emissions by Sector
- Proposed Program: Sectors and Scope
- Existing Reporting Requirements for VT Entities

Appendix B: Comparison of Data Collection Strategies