

# EPA Proposed Mandatory Greenhouse Gas Reporting Rule

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Climate Leader Partner Observations

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# Review Of EPA's Proposed Rules

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- ❑ They appear to be well designed – built on EPA's experience with Title IV
- ❑ Correctly focused on direct emissions and upstream production
- ❑ Agency verification appropriate
- ❑ Different goal than EPA Climate Leaders inventory

# Partners Should Already Benefit

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- Have identified GHG emissions
- Quickly determine if facilities meet minimum reporting thresholds
- Developed data reporting and documentation processes

# Sustainability Material Issues

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- Leadership, Management & Strategy
  - What industry leaders do
- Climate Change
  - Has helped us identify and collect small GHG sources
  - IMP fits our direction toward ISO 14001
- Stakeholder Engagement
  - We learn from a variety of industries
  - Others can learn from us



# AEP's Perspective

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- ❑ Expect decision on Climate Policy in the next year or two.
- ❑ We need to find common solutions with various stakeholders
- ❑ AEP believes legislation must be economy-wide



# Will Climate Leaders Continue to Have Value?

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- ❑ Uncertain from a purely emissions reporting perspective
- ❑ Still gain value from interaction with other sectors
- ❑ At this point we intend to continue our voluntary commitments such as the Chicago Climate Exchange and EPA's Climate Leaders

