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October 18, 2022

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

Re: OEP/DPC/CB-1
WBI Energy Transmission, Inc.
Docket No. CP22-466-000
§ 375.308(x)(3)

Dear Ms. Bose:

WBI Energy Transmission, Inc. (WBI Energy), herewith submits its response to the data request from the Office of Energy Projects of the Federal Energy Regulatory Commission (Commission) received on October 13, 2022 in the above referenced docket.

WBI Energy states that the response provided herein was prepared by WBI Energy and represents the response of WBI Energy and not the individual preparer.

Pursuant to 18 CFR § 385.2010 of the Commission's regulations, copies of the response are being served to each person whose name appears on the official service list for this proceeding.

Any questions regarding this filing should be addressed to the undersigned at (701) 530-1563.

Sincerely,

/s/ Lori Myerchin

Lori Myerchin
Director, Regulatory Affairs and
Transportation Services

Attachments

cc: via email
Samuel Burton, OEP, FERC
Official Service List

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 18th day of October 2022.

By /s/ Lori Myerchin
Lori Myerchin
Director, Regulatory Affairs and
Transportation Services
WBI Energy Transmission, Inc.
1250 West Century Avenue
Bismarck, ND 58503
Telephone: (701) 530-1563

STATE OF NORTH DAKOTA)
COUNTY OF BURLEIGH)

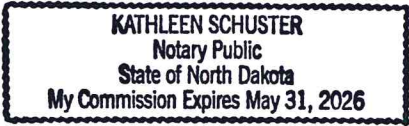
I, Lori Myerchin, being first duly sworn, do hereby depose and say that I am the Director, Regulatory Affairs and Transportation Services for WBI Energy Transmission, Inc.; that I have read the foregoing document; that I know the contents thereof; that I am authorized to execute such document; and that all such statements and matters set forth therein are true and correct to the best of my knowledge, information and belief.

Dated this 18th day of October 2022.

By *Lori Myerchin*
Lori Myerchin
Director, Regulatory Affairs and
Transportation Services

Subscribed and sworn to before me this 18th day of October 2022.

Kathleen Schuster
Kathleen Schuster, Notary Public
Burleigh County, North Dakota
My Commission Expires: 5/31/2026



WBI Energy Transmission, Inc.
Wahpeton Expansion Project
Docket No. CP22-466-000

Response to FERC's October 13, 2022 Data Request

Downstream Greenhouse Gas Request

Provide supporting calculations for WBI Energy's downstream greenhouse gas emission estimate in tons per year of carbon dioxide equivalent emissions (CO₂e) assuming "all of the natural gas being delivered [by the proposed Wahpeton Expansion Project] was combusted" as stated in section 9.3.1.3. Clearly identify the source(s) of emission factors used and all assumptions made. Explain how the estimate stated in section 9.3.1.3 is related to the incremental firm natural gas transportation capacity of 20,600 dekatherms per day that would be delivered by the project as stated in the application. Identify the heating value of natural gas (BTU per standard cubic foot) assumed.

Response:

Attached are the supporting emission calculations for the downstream combustion of the full capacity of the project (20,600 equivalent dekatherms per day). Based on further review of the emission calculations, the heating value used in the calculations is 1,020 BTU per standard cubic foot, based on emission factors in the U.S. Environmental Protection Agency's AP-42. This heating value results in slightly lower downstream carbon dioxide equivalent emissions (CO₂e) than presented in section 9.3.1.3 of Resource Report 9. Based on the supporting emission calculations, downstream CO₂e emissions from the combustion of 20,600 equivalent dekatherms per day of project capacity is 440,306 tons per year.

Attachment

Downstream Greenhouse Gas Request Attachment – Supporting Emission Calculations

Date: 10/14/2022

Project: Wahpeton Expansion Project

Subject: Natural Gas (NG) Emissions

Task: Downstream Greenhouse Gas (GHG) & Criteria Pollutant Emissions Estimate

Pollutant ¹	Emission Rate (lb/MMCF)	Emission Rate (lb/MMBtu)	Emissions (tpy)
NOx	100.0	---	369
CO	84.0	---	310
VOC	5.5	---	20
PM/PM ₁₀ /PM _{2.5}	7.6	---	28
SO ₂	0.6	---	2

GHGs ²	Emission Rate (kg/MMBtu)	Emission Rate (lb/MMBtu)	Emissions (tpy)
CO ₂	53.06	117.00	439,851
CH ₄	0.001	0.002	8
N ₂ O	0.0001	0.0002	1
Mass-Basis TOTAL	---	---	439,860
CO₂e TOTAL	---	---	440,306

Capacity

Daily delivery	20,600	MMBtu/day
Annual delivery	7,519,000	MMBtu/year
	7,372	MMCF/year

Constants

NG heating value ¹	1,020	Btu/scf
Operating days	365	days/year

100-year Global Warming Potentials (GWPs)³

CO ₂	1
CH ₄	25
N ₂ O	298

1. Criteria pollutant emission factors and gross heating value of natural gas are based on AP-42, Section 1.4 for small uncontrolled boilers. (July, 1998).
2. CO₂, N₂O & CH₄ emission factors from 40 CFR Part 98 Tables C-1 and C-2 (December 2016).
3. Global warming potentials are based on U.S. EPA Emission Factors for Greenhouse Gas Inventories (March 2020): <https://www.epa.gov/sites/production/files/2020-04/documents/ghg-emission-factors-hub.pdf>