



## GHG Reporting Kickoff Webinar for 2022 Data

DATE, JANUARY 25, 2023

SLIDES AVAILABLE HERE: <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training>

## Outline

- Overview
- General reporting and verification information
- Lessons learned from the past year
- Cal e-GGRT reporting tool updates
- Questions

## 2021 Data Reporting Recap

- 832 reports submitted
- 493 verified
- 100% received positive / qualified positive emissions verification statements
- Other reports not subject to verification (i.e., abbreviated reporters or retail providers with no imports/exports)
- 2021 summary data posted for all reports here:
  - <https://ww2.arb.ca.gov/mrr-data>

## Key Reporting Dates for 2022 Data

<https://ww2.arb.ca.gov/mrr-key-dates>

Date	Activity
<b>April 10</b>	Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting
<b>June 1</b>	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
<b>August 10</b>	Regulatory Deadline: Verification statements due (emissions data and product data)

## Reporting and Verification Schedule

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- RY2022 is the second year of the compliance period
- Site visits optional unless you hire a new verifier or had a qualified positive verification statement last year
- Verification statements due by Aug. 10<sup>th</sup>, 2023
- No extensions to reporting or verification deadlines
- Failure to submit a report or verification by the required deadline is a violation of the regulation for each day the report or verification is late

## Enforcement

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- Issues that could lead to enforcement
- Incorrect data reported
- Failure to fix correctable errors that result in an adverse statement
- Late reports or failure to report
- Late verification or failure to verify
- CARB has completed enforcement actions related to reporting
- Completed MRR case settlements posted here: <https://ww2.arb.ca.gov/resources/documents/mrr-enforcement>

## General Reporting and Verification Information

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### Reporting Tips

- Use 2018 Mandatory Reporting Regulation to report 2022 data: <https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf>
- CARB guidance materials located here: <https://ww2.arb.ca.gov/mrr-guidance>
- Utilize other resources available on the Mandatory Reporting website: <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting>
- If you think you may be eligible for cessation of reporting or verification [pursuant to section 95101(h)] or are ceasing operations [section 95101(i)], contact CARB staff before the reporting deadline so we can ensure regulatory requirements are appropriately met
- Contact CARB for any questions about requirements ([ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov))
- Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

## Verification Essentials

- New verification body is required every six years
- Be prepared to trace data to its origin
- Ensure GHG Monitoring Plan meets the requirements of section 95105(c) and includes any additional information that would be helpful to your verifier
- Correctable errors must be fixed. If not, verifier must submit an adverse statement
- If verifier or reporter is unsure of requirements, please contact CARB for assistance
- Retain written/emailed guidance from CARB staff for review by your verifier

## Verification Best Practices

- Initiate verification as soon as possible to allow time for revisions
- Streamline verification:
  - Execute verifier contract prior to report certification
  - Associate your report with your verifier at any time
  - Provide data to verifiers ASAP
  - It is good practice to have a webinar prior to a site visit (if required)
    - Be ready for questions early in the process from your verifier
    - If no site visit is conducted, we highly recommend a webinar with screenshare
  - Communicate promptly to ensure important issues are discussed early
- Start early and plan to finish early to ensure timely submittal

## Reporting Reminders

- Don't forget to submit and certify a generated report
- If your report won't generate:
  - Clear all validation messages
  - Clear a pending Certificate of Representation (COR)
  - Time-out issues: Try generating your report 3-4 times, then notify CARB
- As the DR (Designated Representative), notify CARB if you will no longer serve as the DR
  - It's the company's responsibility to notify CARB and re-assign someone as the DR
  - We've had issues tracking down new personnel when the DR leaves, therefore, we highly recommend all reporters designate an ADR (Alternate Designated Representative)
  - Late reporting violations do apply in such cases
- Notify CARB promptly if your facility is being sold or operational control is switching to a different operator
  - CARB will evaluate responsibility for reporting, verification, and C&T compliance
  - Can be complicated if transfer occurs during verification

## Certifying and Submitting a Report

Ensure your annual emissions data report is "certified" in Cal e-GGRT

**SUBMIT ANNUAL REPORT**  
If all supports are completed and Validation Messages addressed to your satisfaction, you are ready to prepare and submit an Annual Report.

Report	Status	Submitted Date	Certification Date	Verification Date	GENERATE / SUBMIT
2019 Annual Report v1	Submitted, Pending Certification and Signature	01/02/2020 6:50 AM	01/02/2020 6:50 AM	01/02/2020 6:50 AM	

**SUBMIT ANNUAL REPORT**  
If all supports are completed and Validation Messages addressed to your satisfaction, you are ready to prepare and submit an Annual Report.

Report	Status	Submitted Date	Certification Date	Verification Date	HTML Excel XOLLI Receipt
2019 Annual Report v1	Complete, Certified and Staff	01/02/2020 6:53 AM	01/02/2020 6:53 AM	01/02/2020 6:53 AM	

VERIFICATION BODY  
 This report does not require third party verification.

**SUBMIT AND CERTIFY REPORT**  
If you have reviewed and are satisfied with your Annual Report you may proceed to include applying your electronic signature (entering your password and answering:  
**SUBMIT/CERTIFY**  
1 After clicking the SUBMIT/CERTIFY button, and completing the certification process, you will be prompted to generate a new report until the certified report is requested by a verifier or CARB staff.

# Clearing Validation Messages

Example: For electricity generating facilities, total facility electricity generation, and nameplate capacity in Subpart A must equal the sum of unit-level electricity generation and nameplate capacity in Subpart C

**FACILITY LEVEL VALIDATION MESSAGES**

Validation Type <sup>1</sup>	ID <sup>2</sup>	Message <sup>3</sup>
Data Completeness	A2001	The sum of all Net Generation amounts from each subpart C or D units must be, within plus or minus Error of the total facility Nameplate Capacity. (Discrepancy: 110000 MWh) (Facility: 951126)(4)(A), 951126)(4)(B), and 951126)(4)(C)
Data Completeness	A2003	The sum of all Nameplate Generating Capacity amounts from each subpart C or D units must be equal to the Total Facility Nameplate Generating Capacity. (Facility: 951126)(4)(A)

Total Facility Nameplate Generating Capacity: 100 MW

Subpart A: 100 MW

Subpart C: 110000 MW

DISPOSITION OF GENERATED ELECTRICITY (951126)(4)(A)

Electricity Provided to:

- Retail Enduser/Balancing 100000
- Admins Municipal Power
- Generated Electricity by Grid Disposition 951126)(4)(A)

Electricity Generation Information:

- Gross Generation: 110000 MWh
- Net Generation: 100000 MWh

Electricity Generating Units Basic Information:

- Nameplate Capacity: 100 MW
- Prime Mover Technology: Combustion Turbine (Single Cycle)
- Type of Thermal Energy Generation: Electricity only EOU

# CARB Quality Assurance (QA)

Process:

- CARB staff complete QA checks on reported data
  - Send outreach to reporters and/or verifiers if potential errors are identified via direct email, phone call, or finding reports
1. Spring/Summer Outreach = Reactive. To correct errors made in current reporting year data prior to verification deadline
  2. January Outreach = Proactive. To prevent errors identified in prior reporting year from occurring in the new reporting year

# Clearing a Pending COR

- When a new DR/ADR accepts their invitation, a Certificate of Representation (COR) must be signed
- An incomplete COR appears under Home tab of invitee's account
- Report cannot be certified and submitted with a pending COR

HOME FACILITY MANAGEMENT DATA REPORTING

Cal e-GGRT Help

About Cal e-GGRT Home

**ACTION REQUIRED:**

Action: Sign Certificate of Representation

Facility or Supplier: KL40 Stage Test

# CARB QA Outreach: Findings Reports

- What are they? Excel csv file that lists QA check findings applicable for a particular reporting entity ("entity report") or for a particular user ("user report")
- When are they issued?
  - January: When Cal e-GGRT goes live (for proactive QA)
  - Late May: For reactive QA
- Where do I find them?
  - Entity report is uploaded into the Cal e-GGRT entity account for the relevant RY (Under Data Reporting > Select Facility > Facility or Supplier Overview: CARB ATTACHMENTS)
  - User report is uploaded into the Cal e-GGRT user account. (Under My Profile > Exchange Files with CARB: DOWNLOAD FILES FROM CARB)
- How do I know when a finding report has been issued? After reports have been uploaded in Cal e-GGRT, CARB will notify reporters and verifiers associated with entities who have been issued reports

## CARB QA Outreach: Finding Reports

- Entity report is uploaded into the Cal e-GGRT entity account
- User report is uploaded into the Cal e-GGRT user account

CARB ATTACHMENTS

Choose File No file chosen

File Name: 15912-2021\_Entity QA Findings\_2022-05-26.csv Uploaded By: Chris ARBL Helpdesk Uploaded Date: December 3, 2022 9:55:56 AM

UPLOADED

My Profile Menu

**EDITING YOUR CAL E-GGRT PROFILE AND ACCOUNT INFORMATION**  
Use the links below to edit different aspects of your Cal e-GGRT user profile and account information:

- Edit My Profile: Organization Name, Address, Phone and FAX
- Edit My Email
- Request Name Change
- Request My Password
- Change My Password
- Change My Secret Question/Answer
- Reset My Challenge Questions
- Exchange Piles With CARB

DOWNLOAD FILES FROM CARB

File Name: 15912-2021\_Entity QA Findings\_2022-05-26.xlsx

## Lessons Learned

## Units Combusting Natural Gas

- Amount of fuel purchased in Subpart A (in MMBtu)
- Match closely with sum of unit-level inputs in Subpart C (or D)

NATURAL GAS PURCHASE ACQUISITION FOR REPORTING FACILITIES

Natural Gas Supplier Name \* [Pacific Gas and Electric Company (PG&E) - Supplier of Natural Gas (ARB: 1040) ▼]

Other Natural Gas Supplier's Name

Customer Account \* Number(s), Service Account Number(s), or Account Number(s) (include all accounts)

Natural Gas Purchased/Acquired

EQUATION C-1b SUMMARY AND RESULT

$CO_2 = 1 \times 10^{-3} \times \text{Gas} \times EF$   
Hover over an element in the equation above

Emission Type	Biogenic %	Gas (mmBtu)	EF
CO2	0	10,000	53.02

## Units Reporting Thermal Energy

- Thermal energy disposition in Subpart A needs to match closely with total thermal output in Subpart C
- Keep in mind: total thermal output should roughly equal how much steam you use + how much steam you sell

THERMAL ENERGY DISPOSITION

Thermal Energy \* Generating Unit, System, or Group Name

End-User Name \*

ARB ID (if applicable)

NAICS Code (optional)

Thermal Energy Provided/Sold  MMBtu

## Cogen/Bigen Units

- Total thermal output + total electricity generation should not exceed total unit heat (fuel) input(s)
- Important to double check because CARB is estimating emissions from electricity generation

ENERGY GENERATION INFORMATION	
Gross Generation	<input type="text"/> MWh
Net Generation	<input type="text"/> MWh
Total Thermal Output (for Cogeneration or Bigeneration) [95112(b)(3)]	<input type="text"/> mmBtu
Mass or Volume of Fuel Combusted Per Year [Fuel]	<input type="text"/> (scf)

## Guidance for Suppliers of Biofuels

- The MRR point of regulation (POR) for transportation fuel suppliers [§95121(a)(2)] specifies that only enterers who import and supply fossil fuels outside of the bulk/terminal system are subject to reporting emissions from imported fuels. Entities who import only biofuels do not need to report emissions from imported fuels.
  - Ex. A supplier imports only R80/B20 (80% renewable diesel, 20% biodiesel) and supplies it outside of the bulk system = Entity is not required to report any emissions from imported biofuels
- COI fee requirements [95121(d)(7) - (8)] apply to all subject transportation fuel suppliers
  - Ex. If a supplier imports only BD, but is subject to 95121 reporting because they also supply fuel across a terminal rack, they will need to report imported BD for COI fee purposes, but not emissions reporting
- Only emissions from fuels listed in Table 2-5 are reportable under section 95121

## Method Change Requests

- Section 95103(m) of MRR provides requirements for:
  - Temporary or permanent changes to prescribed methods
  - Alternative measurement and monitoring methods
- Contact CARB if a method change is needed
- Submit requests as soon as possible to facilitate approval in timely manner

CARB ATTACHMENTS	
Choose File	No file chosen
File Name	
Refinery Request for Alternative Method.pdf	
Postponement Request for Refinery X.pdf	
List of Meters for Postponement Request.pdf	
CARB Approval of Postponement Request.pdf	
CARB Approval of Alternative Method.pdf	

## Cal e-GGRT Updates

## Cal e-GGRT News & Reminders

- Tool will be available soon for 2022 data reporting: <https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT release automatically migrates 2021 data configuration to 2022 reports
- Update DR, ADR, Agents (Important!)
- Contact GHG helpdesk if you have questions regarding Cal e-GGRT or QA outreach

## Reminder: Choosing a Verification Body

- Entities subject to verification can select a VB at any time

Report	Status	Submitted Date	Certification Date	Verification Date	Verification
2021 Annual Report V1	Ready for Verification	05/12/2022 2:24 PM	05/12/2022 2:24 PM		HTML   Excel   XML   Receipt

VERIFICATION BODY

Select

This report does not require third party verification.

- Verifiers submit conflict of interest forms via Cal e-GGRT
- Approvals from CARB typically take less than a week
- New reporters must select a VB before verifier can submit COI

## CARB Notes in Cal e-GGRT

- A small number of emissions data reports contain "Notes from CARB" added by CARB staff as a reminder to the reporting entity and the verifier

A	B
1	<b>Facility Name:</b> ACME Production
2	Facility ARB ID: 999003
3	Facility Reporting Year: 2022
4	
5	<b>Certification Statement:</b> The designated representative or alternate designated representative
6	
7	Notes from CARB: This facility is required to upload customer information for review by their verifier. Please contact CARB staff with questions.
8	
9	<b>Facility Representatives</b>
10	Designated Representative: john henry
11	Alternate Designated Representative: ann smith

## Greatest Risks for Mis-reporting

- New reporting entity staff
- Please keep DR/ADR info up to date so we can contact new staff
- If you need help, please **reach out!** That's what we're here for
- Assuming previous methods/reported data were correct
- Contact CARB staff to confirm your own understanding of basic reporting requirements

## Cost of Implementation Fee Update

- Starting this year, CARB will send COI fee invoices electronically by upload to Cal e-GGRT (e.g., RY2021 accounts for this year), and via email attachment to DRs, ADRs, and the listed Responsible Party
- Please ensure your DR, ADR, and/or Responsible Party for Payment and Email has been updated when the invoices are posted usually in late-June/mid-July
- We will not share invoices with parties who are not explicitly affiliated with your current account in the tool even if requested by the DR or ADR, but you may forward along your emails if you choose

CARB ATTACHMENTS

Choose File | No file chosen | **UPLOAD**

File Name
Method-of-Data.docx
999997-2021-FY2023-24_COI_Official_Invoice_Final.pdf
999997-2021-FY2023-24_COI_Detailed_Invoice_Final.pdf

Facility Profile
<b>Physical Address</b> ARB Test Facility - TEST ONLY Home Street Sacramento CA 95814 USA
<b>Mailing Address</b> ARB Test Facility - TEST ONLY 1001 I Street Sacramento CA 95818 USA
<b>Billing Address</b> ARB Test Facility - TEST ONLY 123 Chickaboom Australia CA 85000 USA
<b>Responsible Party for Payment</b> Hey There
<b>Responsible Party Email</b> k.bear@hee.com
<b>Responsible Party Phone</b> 3234450999

## The Take Home Message

- Reach out to your verifier ASAP and select them in Cal e-GGRT
- No revisions to regulation or guidance documents this year
- Lots of resources available online
- Contact CARB for additional guidance, questions about QA Findings, or if any issues arise (<https://ww2.arb.ca.gov/mrr-contacts>)

## Resources

- Email reporting questions to: [ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov)
- Email verification questions to: [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov)
- Reporting Guidance  
<https://ww2.arb.ca.gov/mrr-guidance>
- Reporter Training Presentations  
<https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training>
- Cal e-GGRT Training  
<https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT Main Help Page  
<http://www.cdscsupport.com/confluence/display/calhelp/Home>
- Verification Bodies  
<https://ww2.arb.ca.gov/verification-bodies>

## GHG Reporting Contacts

All questions can be directed to [ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov)

Program / Sector	Contact
Manager – Climate Change Reporting Section	Syd Partridge <a href="mailto:Syd.Partridge@arb.ca.gov">Syd.Partridge@arb.ca.gov</a>
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	Maebeth Lopez <a href="mailto:Maebeth.Lopez@arb.ca.gov">Maebeth.Lopez@arb.ca.gov</a>
Reporting Tool Registration and General Questions	Karen Lutter <a href="mailto:Karen.Lutter@arb.ca.gov">Karen.Lutter@arb.ca.gov</a>
Electricity Retail Providers and Electricity Marketers	Ashish Singh <a href="mailto:Ashish.Singh@arb.ca.gov">Ashish.Singh@arb.ca.gov</a> Tess McDermott <a href="mailto:Tess.McDermott@arb.ca.gov">Tess.McDermott@arb.ca.gov</a>
Fuel and CO <sub>2</sub> Suppliers (Transportation Fuels, Natural Gas, LPG, and CO <sub>2</sub> )	Smadar Levy <a href="mailto:Smadar.Levy@arb.ca.gov">Smadar.Levy@arb.ca.gov</a>
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	Djay Patel <a href="mailto:Djay.Patel@arb.ca.gov">Djay.Patel@arb.ca.gov</a>
Manager – Greenhouse Gas Verification Section	Ryan Schauland <a href="mailto:Ryan.Schauland@arb.ca.gov">Ryan.Schauland@arb.ca.gov</a>
More contact information at: <a href="https://ww2.arb.ca.gov/mrrcontacts">https://ww2.arb.ca.gov/mrrcontacts</a>	



# Questions

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