



RY2024 MRR Kick-Off Webinar for Electric Power Entities

March 11, 2025

2023 EPE Data Reporting Recap

- 108 EPE reports submitted
- 107 received positive / qualified positive emissions verification statements
- CARB conducted 8 EPE verification audits
- 2023 summary data posted for all reports here:
 - <https://ww2.arb.ca.gov/mrr-data>
- **1 Adverse Statement & 3 Set-asides**

Case Study I: Adverse Verification Statement

- Verifiers are required to submit an adverse verification statement (VS) if they can't submit a positive or qualified positive VS at the deadline
- Make sure you are in close communication with your verifier & you answer their questions in a timely manner
- **Goal:** All issues that impact the VS must be resolved by the deadline
- Verifiers must notify CARB of possible adverse VS 14 days before the deadline at latest
- Adverse results in assigned emission level (AEL) [§95131(c)(5)]. AELs can't always be accurate, but may be conservative resulting in higher emissions costs as well as potential enforcement

Linkage

- The Cap-and-Trade Program has been linked with Québec since 2014
- California, Québec and Washington have announced interest in exploring potential linkage with Washington's Cap-and-Invest Program
- Linkage with Washington would require multiple steps including Governor's findings and a rulemaking process
- Current MRR reporting provisions have not changed
- Contact CARB immediately if you encounter any issues related to reporting similar data to two different GHG programs or if your data collection/processing has changed
 - Reporting methodology change requests require several months of iterative review time

Case Study II: EIM Set-aside

- If you have any affiliation with CAISO's energy imbalance market (EIM):
 - It's extremely likely EIM participant EPEs will have CA imports to report, even if CAISO did not explicitly inform you of this
 - Be aware of your EPE's EIM participation status
 - Only CAISO can provide the data you need to report to CARB
 - **Contact us for CAISO contact details**
 - Start requesting and sourcing data early – it can take some time and a few tries to get it right

Case Study III: First Deliverer Set-aside

- ONE contains many checks and back-stops but is not fool-proof
- Read the instructions in every column to understand if two responses may be incompatible
 - Contact us if you are unsure what we are asking for in any field
- "First deliverer" means those imports and emissions are the reporting EPE's
 - **New built-in first-deliverer check by formula**
 - If you claim first-deliverer you can't list a first deliverer and vice-versa
 - Will prohibit submission

| First Deliverer Assessment | |
|---|--|
| Are YOU the PSE on the NERC eTag in the Physical Path table on the last California border crossing, or meet the first deliverer definition in §95102? | Name of the First Deliverer? |
| Answer "yes" in this column if you are the First Deliverer. | Select an EPE in this column only if you answered "No" in Column C1 (e.g., you are not the First Deliverer). Leave blank if you are the First Deliverer. |
| Are YOU First Deliverer | Select from dropdown; if unlisted enter name into cell |
| First_Deliverer_United | First_Deliverer_United |

Enforcement

- Late reports, set-asides, and Assigned Emission Levels (AELs) could be subject to enforcement
- Additional penalties may be leveled in accordance with both MRR and C&T regulations over and above costs for new verifiers and re-verification

CARB QA Checks Limitations

- CARB QA conducts QA checks right after the June deadline and in mid-July
- These checks are designed to identify most common errors but are limited by the data we have access to - **trust but verify**
 - Verifiers are supposed to check if CARB QA findings are correct **and** to conduct their own reviews as documented in sampling plan
 - Can follow-up with CARB for clarification or re-check
 - Verifiers are required to reach their own, independent conclusion of reasonable assurance of no material misstatement and report conforms to MRR requirements
- CARB checks are generally **minimum** checks
 - Over-reporting is seldom a finding for our QA checks
 - CARB QA checks can miss non-reporting/null values
 - Some QA checks have thresholds for being a finding based on reporter/verifier feedback
- **Ultimately the onus to report accurately and completely is always on the reporting entity**

Control Total Updates

- OATI Control Totals will now have split bilateral Totals from EIM ETSRs
 - All '2-2_OATI_MWh' findings must now be corrected even if you are a EIM participant!
 - Totals are a minimum reporting check – only receive findings if you under-report!
- We do not have resolved totals – we receive just one MWh number for each PSE for of the following:
 - OATI – Imports (with ETSRs removed from total)
 - OATI – Exports (with ETSRs removed from total)
 - OATI – Wheels
 - CAISO – EIM Deemed Total
- If you have issues reporting the minimum control total amounts please contact OATI directly – or contact us for OATI contact information

Lessons Learned

- Rapid changes in electricity markets can result in new reporting issues that require CARB guidance to resolve
- CARB can provide guidance... but we need time for review
 - Lack of review time may result in temporary guidance to continuing reporting as per normal till next year
- Consider costs of verification/set-asides and/or compliance when reporting
 - Over-reporting is still not accurate
- CARB generally defers to verifier concerns – make sure you attempt to resolve them or an adverse may be warranted

Verification Timing

- Three things needed for verification to begin:
 - VB has submitted a conflict of interest (COI) that has been approved (quick turnaround from CARB)
 - EPE has associated their account with the VB (anytime even before report is submitted)
 - EPE submits report
- Verification doesn't have to wait till June 1
- CARB will be sympathetic to verifier concerns that incomplete reports are being submitted to meet the reporting deadline and holding up verifications

When Experiencing Issues with ONE

- Make sure to check the instructions in the Overview tab
 - A common issue is for the file to not be "unblocked" and "enabled;" instructions for doing this are in the Overview tab

Instructions for the Use of This Reporting Workbook

Please note that there has been a Windows security update that requires any downloaded EPE workbook (this includes the SSR workbook as well as the ONE, TWO, and FOUR workbooks) to be both "unblocked" and "enabled" before the macros in the workbook will work correctly. Please perform the following steps before attempting to use any downloaded EPE workbook, and if you encounter any issues when using the workbook, please make sure the following steps have been performed.

1. After downloading the file, right-click the file and select Properties.
2. At the bottom of the Properties window, under Attributes, check the box that says "Unblock."
3. After performing steps 1 and 2, open the file.
4. Click the "Enable" button in the yellow bar at the top of the spreadsheet, under the Excel toolbars.
5. Save the file after clicking "Enable."

When Experiencing Issues with ONE

- Make sure to check the instructions in red at the top of some columns

| First Deliverer Assessment | |
|--|---|
| <p>Are YOU the PSE on the HESIC #Tag System? Mark table on the left as "Yes" if you are the PSE. If not, mark as "No".</p> <p>Do YOU meet the first deliverer definition in Column Q (i.e., you are not the First Deliverer)? Leave blank if you are the First Deliverer.</p> <p>Answer "yes" in this column if you are the First Deliverer.</p> | <p>Name of the First Deliverer?</p> <p>Select an EPE in this column only if you answered "No" in Column Q (i.e., you are not the First Deliverer). Leave blank if you are the First Deliverer.</p> <p>Select from dropdown. If unlisted enter name into cell.</p> |
| Are_You_First_Deliverer | First_Deliverer_Listed |

When Experiencing Issues with Cal e-GGRT

- Always check the upper right-hand corner of Cal e-GGRT for alerts first
- These alerts can appear in the Facility Management and Data Reporting pages for your EPE report
- There is always a hold on a Cal e-GGRT reporting entity account when roles are changed
- Take the action described in the message given by Cal e-GGRT

MY FACILITIES | FACILITY SUMMARY | EPE Test Facility - EPE (2023) | Facility Summary | Cal e-GGRT Help | About Facility Management

Cal e-GGRT FACILITY SUMMARY

From this summary page, depending upon your role, you can make changes to the "Facility Profile" information, the facility's representatives Designated Representative (DR) and Alternate Designated Representative (ADR), and to your Agents if you are a DR or ADR.

NOTE: When a DR or ADR is modified, the Agents associated with that DR or ADR (as shown on the right of the screen), are removed from the reporting account. The new DR or ADR must reassign affected Agents to the account (by using + Add Agent, below) to restore their access.

Pending: The Certificate of Representation has a pending change preventing number changes to the facility or supplier's representatives or profile. The new Alternate Designated Representative, Tess McDermott must use the invitation/acceptance code which was emailed to them on Monday, January 27, 2023.

Resend Invitation (Please click once).

When Experiencing Issues with Cal e-GGRT

- Make sure to upload all EPE reporting workbooks (ONE, TWO, THREE, FOUR) to the EPE Subpart ONLY
 - There is a new restriction in uploading ONE to Subpart A – 'xlm' files are invalid to prevent incorrect uploads
- Make sure you check all validation errors before generating your report – not all prohibit submission, but all must be addressed by the verification deadline
- Below is an example of the validation messages for ONE uploaded to Subpart A

SUBPART A – GENERAL INFORMATION
Each facility or supplier, and for each reporting year is required to supply some basic facility level information, including the entering and reporting of relevant MACS codes and the entering and reporting of all highest-level United States parent companies.

SCREEN ERRORS
Invalid file type - the file name must have a .jpg, .png, .tif, .pdf, .doc, .docx, .ppt, .pptx, .xls, or .xlsx extension.

SUBPART-LEVEL VALIDATION MESSAGES

| Validation Type ¹ | ID ² | Message ³ |
|------------------------------|-----------------|---|
| Data Completeness | EPE002 | You have not uploaded a completed ONE spreadsheet file. |

Subpart A: View Validation

EPE: View Validation

Certify and Submit a Report

- Don't forget to certify and submit a generated report
- Upload ONE to Subpart EPE otherwise you have not properly submitted your report
- If your report won't generate, remember to check the upper right hand corner of your EPE's Data Reporting page for:

- Validation messages
- Pending Certificate of Representation (COR) hold due to representative change

2) DOWNLOAD APPLICABLE FORM(S)

- ONE - EPE Importers and Exporters
- TWO - EPE Supplementary Data for MJRP
- THREE - EPE Supplementary Data for WAPA and DWR SWP
- FOUR - EPE Optional Asset Controlling Supplier Report

3) UPLOAD ONE - EPE IMPORTERS AND EXPORTERS
Please upload your completed ONE - EPE Importers and Exporters spreadsheet here

Choose File no file selected **UPLOAD**

Certify and Submit a Report

Ensure your annual emissions data report is "certified" in Cal e-GGRT. Verifiers can only view your report **after** it has been submitted and certified

EPE: No Validation Messages

SUBMIT ANNUAL REPORT
If all subjects 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 | | |

SUBMIT AND CERTIFY REPORT
If you have reviewed and are satisfied with your Annual Report you may proceed to certify your report by clicking the SUBMIT/CERTIFY button (entering your password and email).

SUBMIT/CERTIFY

SUBMIT ANNUAL REPORT
If all subjects 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 XML Receipt |
|-----------------------|------------------------------|--------------------|--------------------|-------------------|------------------------------|
| 2019 Annual Report v1 | Complete, Certified and Sent | 01/02/2020 6:53 AM | 01/02/2020 6:53 AM | | |

VERIFICATION BODY
This report does not require third party verification.

Cal e-GGRT Tool Availability

- o **ONE workbook is almost live**
 - o <https://ww2.arb.ca.gov/mrr-epe>
- o TWO and FOUR workbooks will be sent to MGRP/ACS entities
- o Electric Power Entity module is almost live!
 - o <https://ssl.arb.ca.gov/Cal-eGGRT/login.do>



2025 Reporting & Verification Schedule

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

| Date | Activity |
|-----------------------------------|---|
| June 2 (due to weekend) | EPE & Retail Sales Reporting Deadline \$95103(e) |
| 2nd week of June: | 1 st QA results |
| Early July | 2 nd QA results |
| July 17 | REC Retirement Deadline for Eligible RPS Adjustments EPEs must certify RECs as retired in the workbook 45 days after the reporting deadline per this date \$95111(g), so verifiers may need to unlock report |
| July 28 | Latest 14-day deadline for notification of possible adverse verification statement (CARB recommends much earlier notification) |
| August 11 (due to weekend) | Final verification statements and reports due \$95103(f) |

Reporting Tips

- o Use 2018 MRR to report 2024 data:
 - o <https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2020-4-3.pdf>
- o CARB EPE guidance materials located here:
 - o <http://ww2.arb.ca.gov/mrr-epe>
- o Contact CARB for any questions about requirements
 - o (ghgreport@arb.ca.gov or ghgverify@arb.ca.gov)
 - o Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

Resources

- o Email reporting questions to: ghgreport@arb.ca.gov
- o Email verification questions to: ghverify@arb.ca.gov
- o Reporting Guidance for EPEs
<https://www2.arb.ca.gov/mrr-epé>
- o Cal e-GGRT Tool Training
<https://www2.arb.ca.gov/mrr-tool>
- o Cal e-GGRT Main Help Page
<http://www.ccdsupport.com/confluence/display/calhelp/Home>
- o Accredited Verification Bodies
<https://www2.arb.ca.gov/mrr-vb>
- o ONE video tutorial
- o https://youtu.be/IP_1_L8jjj8

GHG Reporting Contacts

| Program / Sector | Contact |
|--|--|
| General Reporting Requirements, Reporting Helpdesk | ghgreport@arb.ca.gov |
| General Verification Requirements, Verification Helpdesk | ghverify@arb.ca.gov |
| Manager - Climate Change Reporting Section | Syd Partridge 916.750.0361 |
| Manager - Emissions Data Quality Assurance Section (Verification) | Ryan Schauland 279.842.9017 |
| MRR Electricity Retail Providers & Electricity Marketers Specialists | Tess McDermott 916.272.0049 |
| | Abajh Singh 279.208.7116 |
| Reporting Tool Registration and General Questions | Karen Lutter 279.208.7739 |
| More contact information at: https://ww2.arb.ca.gov/mrrcontacts | |

Questions

