GHG Reporting Kickoff for 2018 Data
Regulation for the Mandatory Reporting
of Greenhouse Gas Emissions
January 24, 2019

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Slides available here:
https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training

Outline

☐ Overview

☐ General Reporting and Verification Information

☐ Summary of Revisions to MRR

☐ Guidance Updates

☐ Cal e-GGRT Reporting Tool Updates

☐ Questions

This webinar focuses on facility and fuel supplier reporting

A separate webinar will be held for Electric Power Entities on March 5, 2019.

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2017 Data Reporting Recap

- 796 reports submitted

- 517 verified
  - 99.6% received positive / qualified positive emissions verification statements

- Other reports not subject to verification (i.e., abbreviated reporters or retail providers with no imports/exports)

- 2017 summary data posted for all reports here:
  - https://ww2.arb.ca.gov/mrr-data

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2019 Key Reporting Dates

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

Date	Activity
April 10	Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting
June 3 (June 1st is Saturday)	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
July 18	Deadline for corrections to RPS Adjustment data required for electric power entity data reports (i.e., 45 days following the emissions data report due date)
August 12 (Aug 10th is Saturday)	Regulatory Deadline: Verification statements due (emissions data and product data)

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Reporting and Verification Schedule

- Time crunch for verifiers!
  - 1st year of new compliance period → Verifiers have to complete site visits for all clients and may have new clients

- No extensions

- 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

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Enforcement

- 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 case settlements posted here: https://www.arb.ca.gov/enf/casesett/casesett.htm

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General Reporting and Verification Information

Reporting Tips

- Use 2016 MRR to report 2018 data:
  https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2016-unofficial-2017-10-10.pdf

- Check CARB guidance materials for revised requirements:
  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 95101(h)] or are ceasing operations [95101(i)], contact CARB staff

- Contact CARB for any questions about requirements (ghgreport@arb.ca.gov)
  - Save and file any CARB responses as part of your GHG Monitoring Plan

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Verification Essentials

- Must hire a new verifier after six years with the same verification body
    - Change of VB automatically requires a site visit

- All entities subject to verification will have a site visit this year due to new compliance period

- Be prepared to trace data to its origin, especially during site visit

- 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

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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 prior to report certification**

    □ Provide data to verifiers ASAP

    □ Schedule site visit early

    □ Communicate promptly to ensure important issues are discussed early

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Summary of Revisions to MRR

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Revisions Effective for 2018 Data

☐ Summarized in **Applicability for 2016 MRR Revisions**: https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/applicability-year.xlsx

   ☐ Link also available online via MRR Guidance webpage: https://ww2.arb.ca.gov/mrr-guidance

Applicability for 2016 MRR Revisions – Reporting Guidance for California's Mandatory GHG Reporting Program

Note: Data year 2017 = 2017 data reported in 2018; Data year 2018 = 2018 data reported in 2019, etc.

#	Regulation Amendment	Regulation Section	Affected Reporting Subpart(s)	Description of Regulatory Update	Data Year Revision is Applicable*
1	Fuel Suppliers - Applicability	95101(b)(3)	Subpart NN	The applicability threshold determination for fuel supplier emissions must now include: • emissions resulting from imported LPG, CNG, and LNG; • emissions resulting from intrastate pipelines delivering natural gas; • all natural gas liquid fractionator emissions; and, • all emissions from operators of LNG production facilities that produced LNG products from natural gas received from interstate pipelines.	2018
2	Onshore Production - Flaring	95101(e), 95101(b)(2)	Subarticle 5 (95150-95158)	Oil and gas facilities must include flaring emissions in the 10,000 metric ton CO_2e threshold determination, and report the flaring emissions if the threshold is exceeded.	2018
3	Cessation of Reporting and Verification	95101(h)	All	Revisions to cessation for facilities, suppliers, and electricity importers to clarify requirements for exiting the GHG reporting program.	2018

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Major Revisions Effective for 2018 Data

☐ **Calculating total emissions relative to thresholds:** Entities must sum specified fuel supplier emissions with facility emissions to calculate total emissions for determining applicability. If reporting threshold is exceeded, both facility and supplier emissions must be reported. [95101(b)(3)]
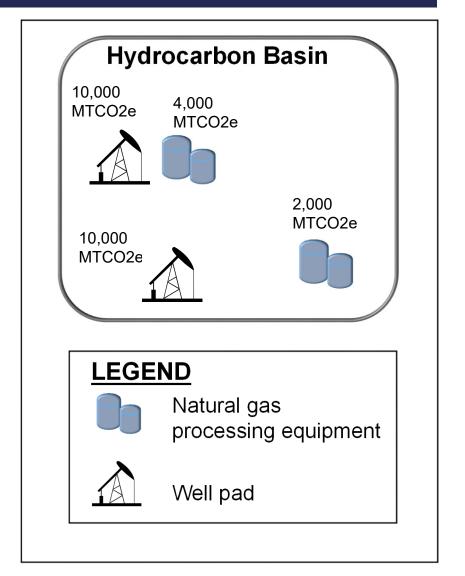
Example	Data Year	Supplier Emissions (MTCO2e)	Facility Emissions (MTCO2e)	Applicability	Reporting Subparts	Total Emissions Reported (MTCO2e)
NGL Fractionator	2017	18,000	8,000	R	NN	18,000
	2018	18,000	8,000	R, V, C&T	C, NN	26,000
Onshore petroleum production facility with gas plant delivering to end-users	2017	3,000	11,000	R	C, W	11,000
	2018	3,000	11,000	R	C, W, NN	14,000

Major Revisions Effective for 2018 Data

- **"Facility" definition for onshore petroleum and natural gas production:** Onshore natural gas processing equipment owned/operated by the facility owner/operator is considered to be "associated with a well pad" unless it is required to be reported as part of a separate facility.

Emissions Reported for 2017:
10,000 + 10,000 + 4,000 = 24,000 MTCO2e

Emissions Reported for 2018:
10,000 + 10,000 + 4,000 + 2,000 = 26,000 MTCO2e
→ Subject to verification and C&T

Hydrocarbon Basin

10,000 MTCO2e

4,000 MTCO2e

2,000 MTCO2e

10,000 MTCO2e

LEGEND

Natural gas processing equipment

Well pad

Major Revisions Effective for 2018 Data

- Point of regulation change for imported LPG, LNG, and CNG, from consignee to importer
  - Refer to "Suppliers of Transportation Fuels and Natural Gas Fuels" guidance document (https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/fuel-supplier.pdf), or contact staff for assistance

- Transportation fuel suppliers required to report volumes of fuel excluded from emissions reporting
  - Excluded volumes reported separately for: RBOB, Diesel No. 1 and 2, Ethanol, Biodiesel, and Renewable Diesel

Updates to Guidance Documents

Guidance Updates

❑ Updated guidance documents available: https://ww2.arb.ca.gov/mrr-guidance

❑ Guidance documents updated to:

  ❑ Provide new guidance for MRR amendments going into effect for 2018 data

  ❑ Improve clarity of existing requirements

Documents Revised for MRR Changes Effective for 2018 data

Applicability for 2016 MRR Revisions (spreadsheet)	Petroleum and Natural Gas Systems
Change of Ownership or Operational Control Notification and Reporter Responsibilities	Hydrogen Producer Reporting
Determining Rule Applicability	Hydrogen Transfer Purchaser/Receiver Reporting FAQ
Measurement Accuracy and Missing Data Provisions	Petroleum Refineries and Coke Calciners
Suppliers of Transportation Fuels and Natural Gas Fuels	Petroleum and Natural Gas Systems Covered Product Data
Natural Gas Liquid Fractionators	Electric Power Entity Reporting Requirements Frequently Asked Questions (FAQs)

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Cal e-GGRT Updates

Cal e-GGRT News & Reminders

https://ww2.arb.ca.gov/mrr-tool

- ☐ Tool available NOW for 2018 data reporting

- ☐ Cal e-GGRT release automatically migrates 2017 data configuration to 2018 reports

- ☐ Update DR, ADR, Agents (Important!)

- ☐ Electric Power Entity Workbook 1 will be activated first week of March

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Updates for consistency with 2016 MRR

☐ Subpart A: No check boxes to specify why GHG emissions changed by more than 5%, only text field for narrative

> Provide a brief narrative description of what caused the increase or decrease in emissions. Include in this description any changes in your air permit status.

☐ Subpart C: Buttons to report the source of geothermal generation is a binary cycle plant (closed loop system), or a geothermal steam plant (open loop system)

> Indicate the source of geothermal generation
> ○ geothermal binary cycle plant or closed loop system
> ○ geothermal steam plant or open loop system

☐ Subpart NN: New field to report LPG excluded from emissions reporting for NGL fractionators and importers of fuel

> Total volume (bbls) of LPG excluded from emissions reporting due to demonstration of final destination outside California, as described in section 95122(d)(8)

Updates for consistency with 2016 MRR

□ Revised workbooks:

    □ Subpart Y, Additional Production Data (refinery products)

    □ Subpart MM, Suppliers of Transportation Fuels Calculation and Reporting Tool

□ New workbook in Subpart NN for LNG Producers to report end-user info

Suppliers of Transportation Fuels Calculation and Reporting Tool

Non-emissions data required by Section 95121(d)(9)	
Fuel Type	**[Quantity]** Total volume excluded from emissions reporting due to demonstration of final destination outside California, use in exclusively aviation or marine applications, or previous delivery by a position holder or refiner out of an upstream California terminal or refinery rack (barrels).
Blendstock (RBOB)	
Distillate Fuel Oils (Diesel No. 1 and 2)	
Ethanol	
Biodiesel	
Renewable Diesel	

Subpart NN – LNG Received by End-Users

End-User Details

Instructions: Enter information for deliveries to industrial facilities and natural gas utilities.

Customer Name	Customer Address (street address, city, state, ZIP code)	Annual Energy of LNG Delivered (MMBtu)
Customer 1	Customer Address	2,320,500

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Updates for Verification

- Entities can select verification body prior to certifying report - one more way to streamline verification process

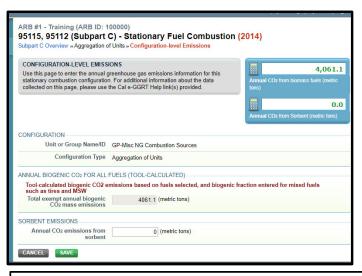- Verifiers can submit conflict of interest forms electronically via Cal e-GGRT
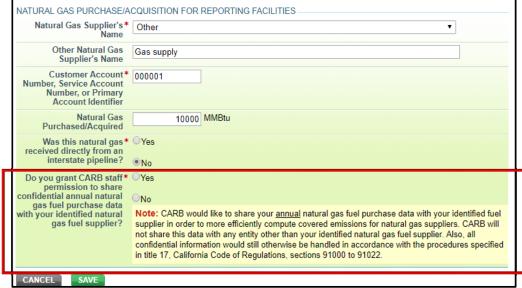
Updates from previous two years

- Cal e-GGRT automatically calculates biogenic emissions for Subpart C reporting

- Check box to provide consent for CARB staff to share NG purchase data with NG supplier

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Batch Certifications in Cal e-GGRT

□ Batch certification and submission of reports (for reporters with multiple facilities)

□ Step 1 – Generate all of the reports

□ Step 2 – Click on Batch Review and Certification

□ Step 3 – Submit batch after final review

Batch Review and Certification

REPORTING YEAR

2017 | GO

REVIEW COMPLETE (for selected rows) | BACK

Select All | Deselect All

	ARB ID	Facility or Supplier	Report Version	
☐	21	ARB_TEST_EPE (Sac, CA)	11	REVIEW
☐	402	Smadar General - Training (Wonderland, CA)	1	REVIEW

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The Take Home Message(s)

- Time crunch for verification
  - Reach out to your verifier ASAP and select them in Cal e-GGRT

- Review changes going into effect for 2018 data:
  - Applicability for 2016 MRR Revisions spreadsheet
  - Updated guidance docs

- Lots of resources available online

- Contact CARB for additional guidance

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Resources

- Email reporting questions to: ghgreport@arb.ca.gov

- Email verification questions to: 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.ccdsupport.com/confluence/display/calhelp/Home

- Verification Bodies
  https://ww2.arb.ca.gov/verification-bodies

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GHG Reporting Contacts

Program / Sector	Contact
Manager – Climate Change Reporting Section	Syd Partridge 916.445.4292
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	**ghgreport@arb.ca.gov**
Reporting Tool Registration and General Questions	Karen Lutter 916.322.8620
Electricity Retail Providers and Electricity Marketers	Wade McCartney 916.327.0822
Fuel and CO_2 Suppliers (Transportation Fuels, Natural Gas, LPG, and CO_2)	Smadar Levy 916.324.0230
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	ghgreport@arb.ca.gov
Manager – Greenhouse Gas Verification Section	Ryan Schauland 916.324.1847
Chief – Program Planning and Management Branch	Brieanne Aguila 916.324.0919
More contact information at: https://ww2.arb.ca.gov/mrr-contacts	

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Questions

Thank you for tuning in!