

# GHG Reporting Kickoff Webinar for 2020 Data



JANUARY 27, 2021

SLIDES AVAILABLE HERE: [HTTPS://WW2.ARB.CA.GOV/OUR-WORK/PROGRAMS/MANDATORY-GREENHOUSE-GAS-EMISSIONS-REPORTING/TRAINING](https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training)

## Outline

- Overview
- General Reporting and Verification Information
- Lessons learned the past year
- 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 in early March, 2021.

## 2019 Data Reporting Recap

- 812 reports submitted
- 507 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)
- 2019 summary data posted for all reports here:
  - <https://ww2.arb.ca.gov/mrr-data>

## Key Reporting Dates for 2020 Data

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

Date	Activity
April 12	Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting
June 1	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
August 10	Regulatory Deadline: Verification statements due (emissions data and product data)

## Reporting and Verification Schedule

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- Verification statements due by Aug. 10<sup>th</sup>, 2021
- 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

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- Use 2018 MRR to report 2020 data: <https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf>
- CARB guidance materials located here (no revisions in 2021): <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

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- New verification body is required every six years
- Change of verification body automatically requires a site visit
- Be prepared to trace data to its origin, especially during site visit, or via webinar when site visit is not required
- 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

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- 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 or webinar early
    - Be ready for questions early in the process from your verifier
  - Communicate promptly to ensure important issues are discussed early
- Start early and plan to finish early ensuring timely submittal

## Regulation and Guidance Updates

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- No major revisions this year
- Guidance documents available:  
<https://ww2.arb.ca.gov/mrr-guidance>
- 2018 Regulation available:  
<https://ww2.arb.ca.gov/mrr-regulation>

## Reporting Reminders

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- 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
- Notify CARB promptly if DR (Designated Representative) left your company
  - It's the company's responsibility to notify CARB
  - We've had issues tracking down new personnel when the DR leaves
  - 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 subparts 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	
2019 Annual Report v1	Submitted, Pending Certification and Signature	01/02/2020 6:50 AM	01/02/2020 6:50 AM		<a href="#">GENERATE / SUBMIT</a>

**SUBMIT and CERTIFY REPORT**

If you have reviewed and are satisfied with your Annual Report you may proceed to include applying your electronic signature and entering your password and answering a security question.

[SUBMIT/CERTIFY](#)

After clicking the SUBMIT/CERTIFY button, and completing the certification process via Cal e-GGRT, you will not be able to generate a new report until the certified report is requested by a verifier or CARB staff.

**SUBMIT ANNUAL REPORT**

If all subparts 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	
2019 Annual Report v1	Complete, Certified and Sent	01/02/2020 6:53 AM	01/02/2020 6:53 AM		<a href="#">HTML</a>   <a href="#">Excel</a>   <a href="#">XML</a>   <a href="#">Receipt</a>

**VERIFICATION BODY**

This report does not require third party verification.

# 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 5 percent of the sum of all electricity dispositions found in the three Disposition of Generated Electricity sections on the Subpart A Overview page [95112(a)(4)(A), 95112(a)(4)(B), and 95112(a)(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 in the Subpart A Overview page.

Total Facility Nameplate Generating Capacity: 100 MW

**ELECTRICITY GENERATING UNITS BASIC INFORMATION**

Facility Type	Stand-alone electricity generating facility	Nameplate Generating Capacity	100 MW
Facility's Energy Disposition	Grid-dedicated facility	Prime Mover Technology	Combustion Turbine (Single Cycle)
		Type of Thermal Energy Generation	Electricity only EGU

**DISPOSITION OF GENERATED ELECTRICITY [95112(a)(4)]**

Total Provider/Marketer [95112(a)(4)(A)]	Electricity Provided or Disposed of [95112(a)(4)(B)]	Subpart C	
Alameda Municipal Power	100000		
Generated Electricity for Grid Disposition [95112(a)(4)(A)]			
		<b>ENERGY GENERATION INFORMATION</b>	
		Gross Generation	111900 MWh
		Net Generation	100000 MWh

# Clearing a Pending COR

- Certification of Representation (COR) is required to be signed when a new DR/ADR accepts their invitation
- An incomplete COR appears under Home tab of invitee's account
- Report can not be certified and submitted with a pending COR

HOME | FACILITY MANAGEMENT | DATA REPORTING

Cal e-GGRT Help

**ACTION REQUIRED:**

Action	Facility or Supplier
Sign Certificate of Representation	KL40 Stage Test

# COVID-19 Concerns

SBP15

- CARB expects all reporting requirements will be met – the regulation has not changed as a result of COVID
- Any issues that reporters or verifiers are having in meeting MRR requirements, as a direct result of COVID, are being reviewed by CARB on an individual basis
- If you think you will have difficulty complying with any MRR requirements, reach out to CARB as early as possible
  - E.g: Missing data issues, requests for remote verifier site visits

## Lessons Learned

## Biomethane vs. Biogas

- Remember: Not all biogas is biomethane!
  - Biomethane is biogas that meets pipeline quality natural gas standards
  - HHV must be within the range of 970 to 1100 MMBtu/scf
  - Remember to report correctly based on this definition
- Mostly a concern for landfills

BIOMETHANE PURCHASES/ACQUISITIONS FOR REPORTING FACILITIES [95103(j)(3)]

[+ ADD Biomethane Purchase/Acquisition](#)

BIOMASS-DERIVED FUELS - GASEOUS

- Biomethane  
 Biogas (Captured methane)

## Change in Annual Emissions

- Located in Subpart A
- Abbreviated reporters: Always select NA.
- If subject to Cap-and-Trade:
  - Check your final emissions number against last year's
  - Answer "yes" if the number has changed by +/- 5%
- Ask CARB for assistance if needed

CAP-AND-TRADE FACILITIES: INCREASES AND DECREASES IN FACILITY EMISSIONS [95104(f)]

For facilities subject to Cap-and-Trade requirements: Have total facility emissions increased or decreased more than 5% in relation to the previous data year? [Not applicable for fuel suppliers, CO<sub>2</sub> suppliers, electric power entities, and abbreviated reporters.]

Yes  
 No  
 Not applicable: Reporting as an abbreviated reporter, fuel supplier, CO<sub>2</sub> supplier, or electric power entity.

**Note: This section is not subject to the third-party verification requirements**

## Annual Hours of Electricity Generation

- We check gross generation divided by nameplate (max rated heat input) capacity, which gives annual total operating hours

$$\frac{\text{Unit annual gross generation (MWh)}}{\text{Unit nameplate generating capacity (MW)}} = \text{Annual hours of operation (h)}$$

- Often find more than a year's worth of operation (8760 hours) reported

Configuration Type: Single Unit Using Tiers 1, 2, or 3

Unit Name/ID: test 1

Description of the Unit or Unit Aggregation: [Dropdown]

Unit Type: OB (Boiler, other)

Maximum Rated Heat Input Capacity: [Input]

Unit of Measure: mmbtu/hr

ENERGY GENERATION INFORMATION

Gross Generation: [Input] MWh

## Unit-level Heat Rate

- We check fuel input (MMBtu) divided by gross energy output (MWh), which gives unit-level heat rate (MMBtu/MWh) as a measure of efficiency
  - Keep in mind that a unit cannot produce more power than the fuel going into the unit.
- Values far outside a typical range of 7 MMBtu/mWh and 10 MMBtu/MWh receive additional scrutiny from CARB
  - Explanation of heat rate and expected values located in this EIA report: <https://www2.energy.ca.gov/2017publications/CEC-200-2017-003/CEC-200-2017-003.pdf>

ENERGY GENERATION INFORMATION		FUEL INPUT DATA FOR EQUATIONS C-1 AND C-8	
Gross Generation	<input type="text"/> MWh	Mass or Volume of Fuel	<input type="text"/> (scf)
Net Generation	<input type="text"/> MWh	Combusted Per Year [Fuel]	<input type="text"/>
Total Thermal Output (for Cogeneration or Bigeneration) [95112(b)(3)]	<input type="text"/> mmBtu		

## Missing or Incorrect EIA ID#

- Download Form EIA-923 detailed data and refer to Column A for plant ID
  - <https://www.eia.gov/electricity/data/eia923/>
  - Make sure to report plant ID, not operator ID

A
U.S. Dept EIA-923 M Sources: Note: Ge
Plant Id
3

ELECTRICITY GENERATING UNIT BASIC INFORMATION	
CEC ID	<input type="text"/> Separate each ID with a comma if more than one.
EIA ID	<input type="text"/> Separate each ID with a comma if more than one.

## LPG Misreported as LPG - Propane

### GHG SUMMARY

Products 1, 3
<input type="checkbox"/> LPG
<input type="checkbox"/> LPG Ethane
<input type="checkbox"/> LPG Ethylene
<input type="checkbox"/> LPG Propane
<input type="checkbox"/> LPG Propylene
<input type="checkbox"/> LPG Butane

- Applies to importers of LPG
- If the component volumes of LPG are known, required to report by component
- If component volumes of LPG are unknown, report entire volume as LPG only
- If LPG – propane is reported by itself, then the volume is indicated as pure propane

## Units Combusting Natural Gas

- Amount of fuel purchased in Subpart A needs to match closely with sum of unit-level heat inputs in Subpart C (or D)

NATURAL GAS PURCHASE/ACQUISITION FOR REPORTING FACILITIES	
Natural Gas Supplier's Name	Pacific Gas and Electric Company (PG&E) - Supplier of Natural Gas (ARB: 1040)
Other Natural Gas Supplier's Name	<input type="text"/>
Customer Account Number(s), Service Account Number(s), or Account Identifier(s). (Include all accounts)	<input type="text"/>
Natural Gas Purchased/Acquired	<input type="text"/> MMBtu

## 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	<input type="text"/>
End-User Name*	<input type="text"/>
ARB ID (if applicable)	<input type="text"/>
NAICS Code (optional)	<input type="text"/>
Thermal Energy Provided/Sold	<input type="text"/> 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	Mass or Volume of Fuel Combusted Per Year [Fuel]
Total Thermal Output (for Cogeneration or Bigeneneration) [95112(b)(3)]	<input type="text"/> mmBtu	<input type="text"/> (scf)

## 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
- Review timing requirements for submittal of method change requests, and submit requests as soon as possible to facilitate approval

## Cal e-GGRT Updates

## Cal e-GGRT News & Reminders

- Tool is now available for 2020 data reporting: <https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT release automatically migrates 2019 data configuration to 2020 reports
- Update DR, ADR, Agents (**Important!**)
- Electric Power Entity Workbook 1 will be activated in early March—**newly updated version of Workbook 1 this year**
- **New sorbent warning message to prevent misreporting**

## Reminder: Choosing a Verification Body

- Entities can select a verification body prior to certifying

SUBMIT ANNUAL REPORT  
If all subparts 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	Ready for Verification	01/02/2020 6:53 AM	01/02/2020 6:53 AM		

VERIFICATION BODY: Select

This report does not require third party verification.

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

## The Take Home Messages

- 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 (<https://ww2.arb.ca.gov/mrr-contacts>)

## Co-processing at Refineries

- Possible revisions to MRR for reporting renewable fuels produced via co-processing of biogenic feedstocks with petroleum feedstocks (renewable gasoline, renewable diesel, and renewable propane)
- Initial workshop was held in September 2020 to discuss potential reg update
- Working with stakeholders, contact CARB to learn more
  - Applies to petroleum refineries



## 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.ccdsupport.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 916.445.4292	
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	Tess McDermott 916.272.0094	
Reporting Tool Registration and General Questions	Karen Lutter 916.322.8620	
Electricity Retail Providers and Electricity Marketers	Abajh Singh 916.322.8276	Tess McDermott 916.272.0094
Fuel and CO <sub>2</sub> Suppliers (Transportation Fuels, Natural Gas, LPG, and CO <sub>2</sub> )	Smadar Levy 916.324.0230	
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	Djay Patel 916.440.8256	
Manager – Greenhouse Gas Verification Section	Ryan Schauland 916.324.1847	
More contact information at: <a href="https://ww2.arb.ca.gov/mrr-contacts">https://ww2.arb.ca.gov/mrr-contacts</a>		

## Questions



## Thank you for tuning in!

