# GHG Reporting Kickoff Webinar for 2021 Data



JANUARY 26, 2022

SLIDES AVAILABLE HERE: <a href="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</a>

#### Outline

- Overview
- General reporting and verification information
- Lessons learned from 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 2022.

#### 2020 Data Reporting Recap

- 831 reports submitted
- 515 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)
- 2020 summary data posted for all reports here:
  - https://ww2.arb.ca.gov/mrr-data

#### Key Reporting Dates for 2021 Data

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

Date	Activity
April 11	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

- RY2021 is the first year of the compliance period. <u>All</u> reporting entities require a site visit
- Verification statements due by Aug. 10<sup>th</sup>, 2022
- 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

#### COVID-19 Concerns

- 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
  - Reach out to CARB as early as possible

#### 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 MRR case settlements posted here:
    - <a href="https://ww2.arb.ca.gov/resources/documents/mrr-enforcement">https://ww2.arb.ca.gov/resources/documents/mrr-enforcement</a>

# General Reporting and Verification Information

#### Reporting Tips

- Use 2018 MRR to report 2021 data: <a href="https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf">https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf</a>
- CARB guidance materials located here: <u>https://ww2.arb.ca.gov/mrr-guidance</u>
- Utilize other resources available on the Mandatory Reporting website: <a href="https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting">https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting</a>
- 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)
  - Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

#### Verification Essentials

- First year of a new compliance period requires a site visit
- New verification body is required every six years
- 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
  - 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 prior to report certification
  - Provide data to verifiers ASAP
  - Site visit required. It is good practice to having a webinar prior to the site visit.
    - 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

- GWP update for 2021+ data years
- Guidance documents available:

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

• 2018 Regulation available:

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

#### GWP Updates for 2021+ Data

OUse updated GWPs for 2021+ data

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OCH4 – was 21, is now 25N2O – was 310, is now 298
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- Cal e-GGRT has been updated with new GWPs
- Subparts MM and W required Cal e-GGRT Workbook updates for GWP factors
  - o Be sure your own calculations include the new factors
- Refer to MRR section 95102 definition for global warming potential

#### New Biofuels

- Notify CARB if you supply or combust fuels not specifically defined in the MRR (e.g., renewable naphtha, bio-LPG)
- See MRR Table 2-5 for the current list of reportable biomassderived transportation fuels

Table 2-5
Blendstocks, Distillate Fuel Oils, and Biomass-Derived Fuels
Subject to Reporting under section 95121

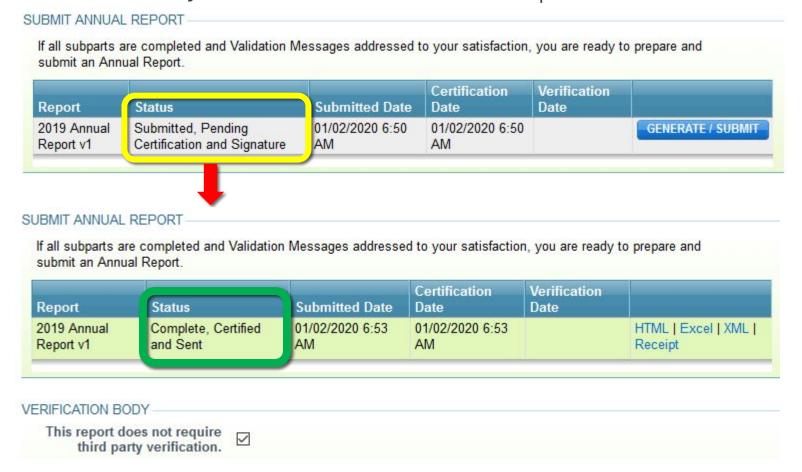
Biomass-Derived Fuel	
Ethanol (100%)	
Biodiesel (≥99%, methyl ester)	
Renewable Diesel (≥99%)	
Rendered Animal Fat	
Vegetable Oil	

#### 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
  - 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 and CERTIFY REPORT

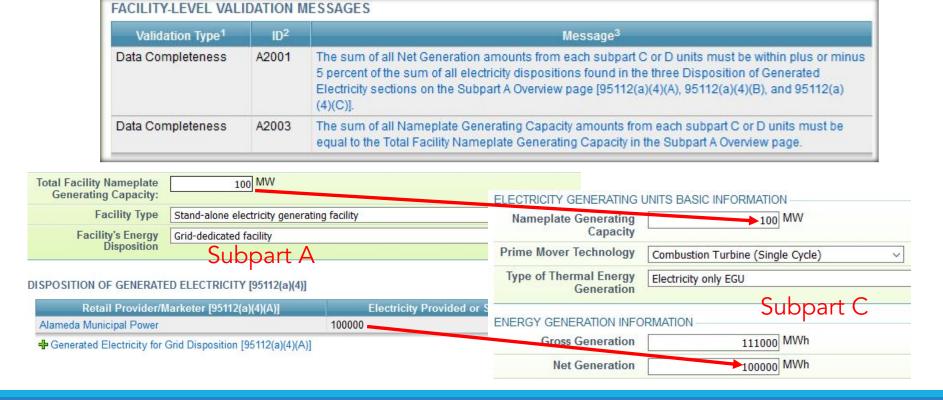
If you have reviewed and are satisfied with your Annual Report you may proceed to s includes applying your electronic signature (entering your password and answering a

#### SUBMIT/CERTIFY >

After clicking the SUBMIT/CERTIFY button, and completing the certification proces via Cal e-GGRT. You will not be able to generate a new report until the certified rep 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



#### 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 can not be certified and submitted with a pending COR



#### CARB Quality Assurance (QA)

#### Process:

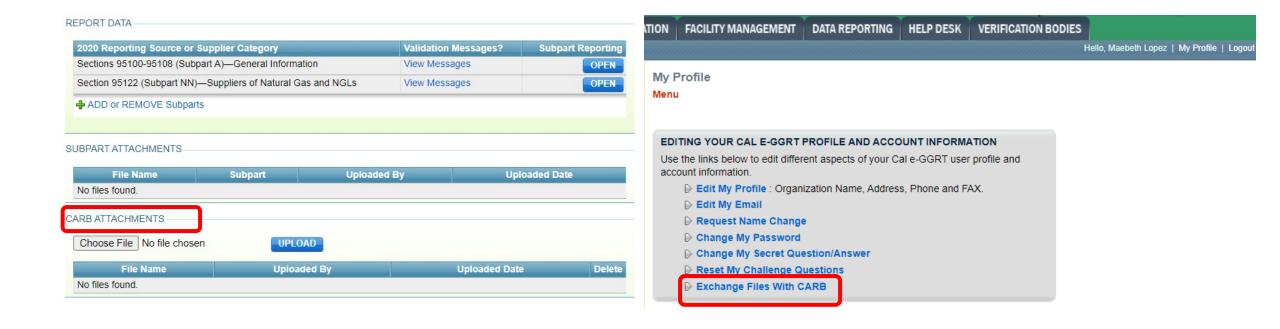
- CARB staff complete QA checks on non-emissions errors
- Send outreach to reporters and/or verifiers if potential errors are identified via direct email, phone call, or finding reports
  - 1. Spring/Summer Outreach = Reactive. To correct errors early on in the verification process
  - 2. January Outreach = Proactive. To prevent errors identified in prior reporting year from occurring in the new reporting year.) (New for RY2021!)

#### CARB QA Outreach: Finding Reports

- What are they? Excel csv files 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 <u>Cal e-GGRT entity account</u> for the relevant RY (Under Data Reporting > Select Facility > Facility or Supplier Overview: CARB ATTACHMENTS
  - User report is uploaded into the <u>Cal e-GGRT user account</u>. (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 <u>Cal e-GGRT entity account</u> for the relevant RY
- User report is uploaded into the <u>Cal e-GGRT user account</u>.



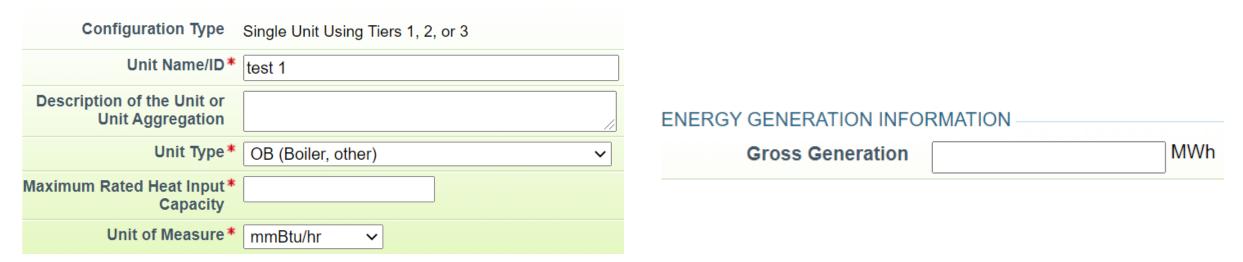
### Lessons Learned

#### Annual Hours of Electricity Generation

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

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\frac{\textit{Unit annual gross generation (MWh)}}{\textit{Unit nameplate generating capacity (MW)}} = \textit{Annual hours of operation (h)}
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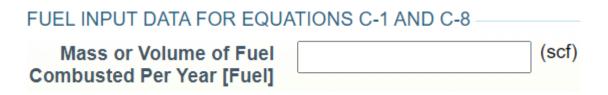
Often find more than a year's worth of operation (8760 hours) reported



#### Unit-level Heat Rate

- We check fuel input (MMBtu) divided by gross energy output (MWh), which gives unitlevel 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: <a href="https://ww2.energy.ca.gov/2017publications/CEC-200-2017-003/CEC-200-2017-003.pdf">https://ww2.energy.ca.gov/2017publications/CEC-200-2017-003/CEC-200-2017-003.pdf</a>

ENERGY GENERATION INFO	RMATION ————————————————————————————————————	
<b>Gross Generation</b>		MWh
Net Generation		MWh
Total Thermal Output (for Cogeneration or Bigeneration) [95112(b)(3)]		mmBtu



### LPG Misreported as LPG - Propane

#### **GHG SUMMARY**



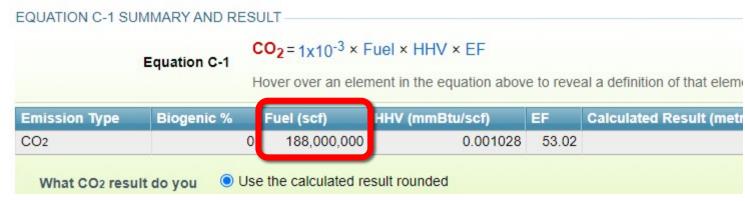
- Applies to importers of LPG
- If the component volumes of LPG are known, required to report by component
- If component volumes of LPG are unknown, report entire volume as LPG only
- If LPG propane is reported by itself, then the volume is indicated as pure propane

#### Units Combusting Natural Gas

Amount of fuel purchased in Subpart A (in MMBtu)

NATURAL GAS PURCHASE/ACQUISITION FOR REPORTING FACILITIES					
Natural Gas Supplier's * Name	Pacific Gas and Electric Compa	any (PG&E) - Supplier of Natural Gas (ARB: 1040 🗸			
Other Natural Gas Supplier's Name					
Customer Account* Number(s), Service Account Number(s), or Account Identifier(s). (Include all accounts)					
Natural Gas Purchased/Acquired	MMBtu				

Match closely with sum of unit-level heat inputs in Subpart C (or D)



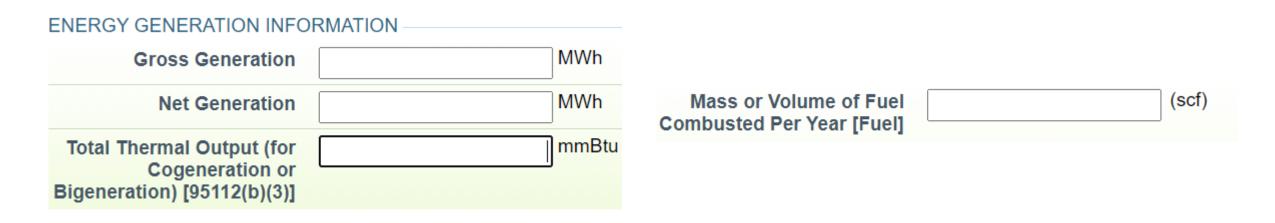
#### Units Reporting Thermal Energy

- 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 DISPOSIT	TION
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



#### 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 ASAP, if a method change is needed
- Submit requests as soon as possible to facilitate approval in timely manner

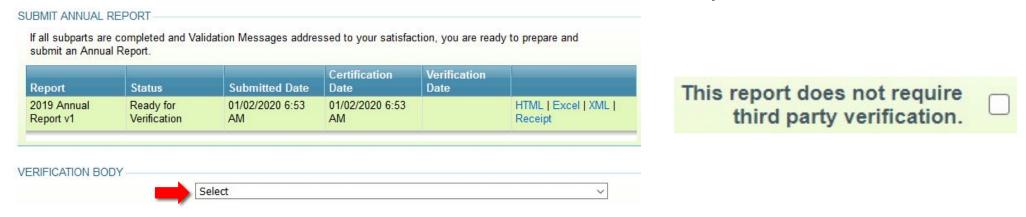
## Cal e-GGRT Updates

#### Cal e-GGRT News & Reminders

- Tool is now available for 2021 data reporting: <a href="https://ww2.arb.ca.gov/mrr-tool">https://ww2.arb.ca.gov/mrr-tool</a>
- Cal e-GGRT release automatically migrates 2020 data configuration to 2021 reports
- Update DR, ADR, Agents (Important!)
- Contact GHG helpdesk if you have questions regarding QA outreach

### Reminder: Choosing a Verification Body

Entities can select a verification body prior to certifying



- 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 Message

- GWP update for 2021 data
- 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 or if any issues arise (<a href="https://ww2.arb.ca.gov/mrr-contacts">https://ww2.arb.ca.gov/mrr-contacts</a>)

#### Resources

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

#### GHG Reporting Contacts

#### All questions can be directed to <a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a>

Program / Sector	Contact	
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#### Questions

