

Instructions for POU or COOP Allocation Distribution and Allowance Recipient Confirmation Forms

Background

The Cap-and-Trade Regulation (Regulation) specifies that each year publicly owned utilities (POUs) and electrical cooperatives (COOPs) participating in the Cap-and-Trade Program have until September 1 (or the first business day thereafter if September 1 is not a business day) to inform the California Air Resources Board (CARB) how to distribute the allowances that will be allocated by CARB to them by October 24 for the following budget year.

For example, by September 2, 2025, POUs and COOPs must inform CARB of the destination accounts for the allowances allocated by October 24, 2025 from the 2026 budget year. If an entity fails to inform CARB of its distribution preference by September 1 or the first business day thereafter, CARB will automatically place all allocated allowances for the following budget year in the entity's limited use holding account.

Allocated allowances may be distributed to:

1. the POU's or COOP's compliance account;
2. the POU's or COOP's limited use holding account;
3. the compliance account of an electrical generating facility operated by either (1) the POU or COOP, or (2) a joint powers authority in which the POU or COOP is a member and with which it has a power purchase agreement; or
4. the compliance account of a Federal Power Marketing Administration (FPMA) with which the POU or COOP has an agreement to purchase imported electricity or a power purchase agreement, including a custom product contract.

The Publicly Owned Utility (POU) or Electrical Cooperative (COOP) Allocation Distribution Form enables POUs and COOPs to specify the destination accounts for allowances that are allocated to them each year as part of the Cap-and-Trade Program.

The POU or COOP Allowance Recipient Confirmation Form allows an eligible generator or FPMA that expects to receive allocated allowances from a POU or a COOP to verify the number of allowances that it expects to receive each year.

This document provides instructions for completing and submitting both of these forms. You can use the navigation pane to find the instructions for each form.

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These instructions and forms are provided for clarity and convenience only. The use of these forms is optional. The instructions and forms do not have the force of law, do not establish new requirements, and in no way supplant, replace, or amend any of the legal requirements of the Regulation.

Instructions for POU or COOP Allocation Distribution Form

The "POU or COOP Allocation Distribution Form" can be found in the Allowance Allocation section of the Cap-and-Trade Program Guidance and Forms webpage. Each year, the "POU or COOP Allocation Distribution Form" allows POU's and COOP's to specify the destination accounts for allowances that allocated by CARB.

- In box 1, enter the POU or COOP legal entity name used in the Compliance Instrument Tracking System Service (CITSS) for the Cap-and-Trade Program.
- In box 2, enter the POU or COOP mailing address used in CITSS.
- In box 3, enter the POU's or COOP's CARB ID number. The CARB ID is a unique number assigned by CARB under the Mandatory Reporting Regulation.
- In box 4, enter the POU's or COOP's CITSS ID.
- In box 5, enter the total number of allowances to be allocated to the POU or COOP from the appropriate allowance budget year. Allowances allocated by October 24, 2025 will come from the 2026 allowance budget. The number of allowances allocated to each utility for the 2026 vintage year can be found either in the "2021-2030 EDU Allocation" tab within the form or in Table 9-4 of the Cap-and-Trade Regulation.
 - **Note:** *The total in box 5 should equal the number of allowances allocated to the POU or COOP in the "2021-2030 EDU Allocation" tab for the upcoming budget year. The sum of the values in boxes 6 through 9 must equal the total in box 5.*
- In box 6, a POU or COOP that was an EIM Purchaser's in Data Year 2024 should enter its EIM Purchaser Emissions that will be deducted from its vintage 2026 allocation. EIM Purchaser Emissions will be communicated by CARB to each EIM Purchaser following the August 11, 2025 MRR verification deadline.
 - *Due to the confidential and market-sensitive nature of this information, please mark completed allowance allocation distribution forms as "Confidential and Market-Sensitive" in the file name when submitting to CARB.*
- In box 7, enter the number of allowances to be placed in the POU's or COOP's compliance account.
- In box 8, enter the number of allowances to be placed in the POU's or COOP's limited use holding account. All allowances placed in the limited use holding account must be consigned to auction during the following calendar year.
- In box 9, enter the total number of allowances to be placed into generator or FPMA compliance account(s), if applicable.

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- These accounts may include the compliance account of an electrical generating facility operated by a POU, a COOP, a joint powers authority in which the POU or COOP is a member and with which it has a power purchase agreement, or a FPMA with which the POU or COOP has either an agreement to purchase imported electricity or a power purchase agreement, including a custom product contract.

In boxes 10a through 10e, enter details for each recipient of allocated allowances. If there is more than one recipient account, please list each in a separate row. The data provided by the POU or COOP in the "POU or COOP Allocation Distribution Form" must match the data submitted to CARB by the generator/FPMA in their "POU or COOP Allowance Recipient Confirmation Form."

- In column 10a, enter the recipient's legal entity name(s). See the latest CITSS Registrants Report on the [Cap-and-Trade Program Data webpage](#) to find the CITSS legal entity name.
 - All entities listed in box 10a must verify this information by completing and submitting to CARB the "POU or COOP Allowance Recipient Confirmation Form." This form can be found in the Allowance Allocation section of the [Cap-and-Trade Program Guidance and Forms webpage](#). Please ensure that any entities listed in box 10a submit a completed "POU or COOP Allowance Recipient Confirmation Form" to CARB by the required deadline.
- In column 10b, enter the recipient's mailing address.
- In column 10c, enter the recipient's CARB ID number.
- In column 10d, enter the recipient's CITSS ID. See the latest CITSS Registrants Report on the [Cap-and-Trade Program Data webpage](#) to find the CITSS ID #.
- In column 10e, enter the number of allowances to be directly deposited by CARB into the entity's compliance account.
 - *Note: The sum of the amounts in each row under box 10e must equal the total in box 9. Each amount under box 10e of this form must also equal the amount submitted to CARB by that specific generator in box 9 of its "POU or COOP Allowance Recipient Confirmation Form."*
- In section 11, the CITSS primary account representative or alternate account representative for the POU or COOP must print their name, sign, and date the certification. Handwritten and electronic signatures are both accepted.

See the Submitting Completed Forms section below for instructions on submitting completed forms.

Instructions for POU/COOP Allowance Recipient Confirmation Form

The "POU or COOP Allowance Recipient Confirmation Form" can be found in the Allowance Allocation section of the [Cap-and-Trade Program Guidance and Forms webpage](#). The POU or COOP Allowance Recipient Confirmation Form allows an eligible generator or FPMA that

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expects to receive allocated allowances from a POU or a COOP to verify the number of allowances that it expects to receive each year.

- In box 1, enter the legal entity name used in the Compliance Instrument Tracking System (CITSS) for the POU or COOP providing the allowances. See the latest CITSS Registrants Report on the [Cap-and-Trade Program Data webpage](#) to find the CITSS legal entity name.
- In box 2, enter the POU's or COOP's mailing address.
- In box 3, enter the POU's or COOP's CARB ID number. The CARB ID is a unique number assigned by CARB under the Mandatory Reporting Regulation.
- In box 4, enter the POU's or COOP's CITSS ID. See the latest CITSS Registrants Report on the [Cap-and-Trade Program Data webpage](#) to find the CITSS ID.
- In box 5, enter the recipient's legal entity name used in CITSS.
- In box 6, enter the recipient's mailing address used in CITSS.
- In box 7, enter the recipient's CARB ID number.
- In box 8, enter the recipient's CITSS ID.
- In box 9, enter the total number of allowances the recipient expects to receive in its compliance account from the POU or COOP.
 - For the recipient named in box 5 of this form, the amount in box 9 must equal the amount under box 10e in the corresponding "POU or COOP Allocation Distribution Form," which is submitted to CARB by the POU or COOP providing the allowances. Please ensure that the information in the "POU or COOP Allocation Distribution Form" submitted to CARB by the POU or COOP named in box 1 is consistent with the information submitted in this "POU or COOP Allowance Recipient Confirmation Form."
- In section 10, the CITSS primary account representative or alternate account representative for the entity must print their name, sign, and date the certification. Handwritten and electronic signatures are both accepted.

Submitting Completed Forms

The information requested in these forms must be received by CARB each year no later than September 1 (or the first business day thereafter if September 1 is not a business day). By September 2, 2025, POUs and COOPs must inform CARB of the destination accounts for the allowances allocated by October 24, 2025 from the 2026 budget year. If an entity chooses to use these forms, CARB requests the following information be sent to edu-allocation@arb.ca.gov:

1. The completed Excel workbook; and
2. A PDF version of the "Main Form" tab of the Excel workbook that includes the signature of the primary account representative or an alternate account representative.

Submitting hard copies to CARB is not required.

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Questions may be directed to edu-allocation@arb.ca.gov.