

GHG Reporting Kickoff Webinar for 2023 Data



DATE: FEBRUARY 7, 2024

SLIDES AVAILABLE HERE: <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training>

Outline

- Overview
- General reporting and verification information
- Lessons learned from the past year
- Cal e-GGRT reporting tool updates
- Questions

2022 Data Reporting Recap

- 832 reports submitted
- 493 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)
- 2022 summary data posted for all reports here:
 - <https://ww2.arb.ca.gov/mrr-data>

Key Reporting Dates for 2023 Data

<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	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
August 12	Regulatory Deadline: Verification statements due (emissions data and product data)

Reporting and Verification Schedule

- RY2023 is the third year of the compliance period
 - Site visits optional unless you hire a new verifier or had a qualified positive verification statement last year
- Verification statements due by Aug. 12th, 2024
- 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

- 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

Reporting Tips

- Use 2018 Mandatory Reporting Regulation to report 2023 data:
<https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf>
- CARB guidance located at: <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)
 - Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

Verification Essentials

- New verification body is required every six years
- Be prepared to trace data to its origin
- 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 at any time
 - Provide data to verifiers ASAP
 - It is good practice to have a webinar prior to a site visit (if required)
 - Be ready for questions early in the process from your verifier
 - If no site visit is conducted, we highly recommend a webinar with screenshare
 - Communicate promptly to ensure important issues are discussed early
- Start early and plan to finish early to ensure timely submittal

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)
- 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, therefore, we highly recommend all reporters designate an ADR (Alternate Designated Representative)
 - Late reporting violations do apply in such cases
- Notify CARB promptly if your facility is being sold or operational control changes
 - 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		GENERATE / SUBMIT

↓

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		HTML Excel XML Receipt

VERIFICATION BODY

This report does not require third party verification.

SUBMIT and CERTIFY REPORT

If you have reviewed and are satisfied with your Annual Report you may proceed includes applying your electronic signature (entering your password and answer)

SUBMIT/CERTIFY+

ⓘ After clicking the SUBMIT/CERTIFY button, and completing the certification via Cal e-GGRT, you will not be able to generate a new report until the certificate 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

Validation Type ¹	ID ²	Message ³
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
Facility Type:	Stand-alone electricity generating facility
Facility's Energy Disposition:	Grid-dedicated facility
Subpart A	
DISPOSITION OF GENERATED ELECTRICITY [95112(a)(4)]	
Retail Provider/Marketer [95112(a)(4)(A)]	Electricity Provided on:
Alameda Municipal Power	100000
Generated Electricity for Grid Disposition [95112(a)(4)(A)]	

ELECTRICITY GENERATING UNITS BASIC INFORMATION	
Nameplate Generating Capacity:	100 MW
Prime Mover Technology:	Combustion Turbine (Single Cycle)
Type of Thermal Energy Generation:	Electricity only EGU
Subpart C	
ENERGY GENERATION INFORMATION	
Gross Generation:	111000 MWh
Net Generation:	100000 MWh

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 cannot be certified and submitted with a pending COR

HOME	FACILITY MANAGEMENT	DATA REPORTING
Cal e-GGRT Help	ACTION REQUIRED:	
About Cal e-GGRT Home	Action	Facility or Supplier
	Sign Certificate of Representation	KL40 Stage Test

CARB Quality Assurance (QA)

Process:

- CARB staff complete QA checks on reported data
 - 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
 2. First Quarter Outreach = Proactive

CARB QA Outreach: Finding Reports

- Entity report is uploaded into the Cal e-GGRT entity account
- User report is uploaded into the Cal e-GGRT user account

CARB ATTACHMENTS

Choose File | No file chosen | **UPLOAD**

File Name	Uploaded By	Uploaded Date
105012-2021_Entity QA Findings_2022-05-26.csv	Chris ARB_Helpdesk	December 3, 2022 9:55:56 AM

My Profile Menu

EDITING YOUR CAL E-GGRT PROFILE AND ACCOUNT INFORMATION
Use the links below to edit different aspects of your Cal e-GGRT user profile and account information.

- ▶ Edit My Profile : Organization Name, Address, Phone and FAX.
- ▶ Edit My Email
- ▶ Request Name Change
- ▶ Change My Password
- ▶ Change My Secret Question/Answer
- ▶ Reset My Challenge Questions
- ▶ Exchange Files With CARB

DOWNLOAD FILES FROM CARB

File Name
105012-2021_Entity QA Findings_2022-05-26.xlsx

Lessons Learned

Units Combusting Natural Gas

- Amount of fuel purchased in Subpart A (in MMBtu)

NATURAL GAS PURCHASE/ACQUISITION FOR REPORTING FACILITIES

Name
Natural Gas Supplier's * Pacific Gas and Electric Company (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 inputs in Subpart C (or D)

EQUATION C-1b SUMMARY AND RESULT

Equation C-1b $CO_2 = 1 \times 10^{-3} \times \text{Gas} \times EF$

Hover over an element in the equation above

Emission Type	Biogenic %	Gas (mmBtu)	EF
CO ₂	0	10,000	53.02

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

End-User Name *

ARB ID (if applicable)

NAICS Code (optional)

Thermal Energy Provided/Sold MMBtu

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
- Submit requests as soon as possible to facilitate approval in timely manner

CARB ATTACHMENTS

Choose File | No file chosen

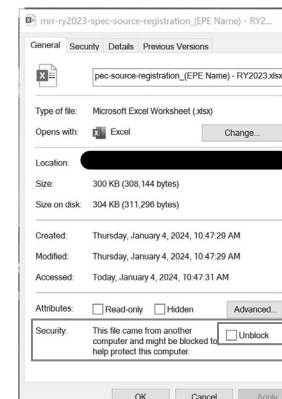
File Name
Refinery Request for Alternative Method.pdf
Postponement Request for Refinery X.pdf
List of Meters for Postponement Request.pdf
CARB Approval of Postponement Request.pdf
CARB Approval of Alternative Method.pdf

Electric Power Entities (EPE) Guidance Spotlight

21

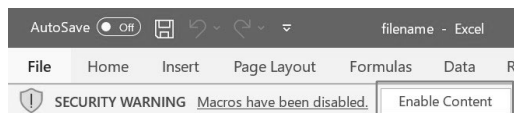
New: Steps to Enable Workbooks

- Windows security update requires downloaded workbooks to be “unblocked” and “enabled”
- Follow these steps:
 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.” (see screenshot)



22

New: Steps to Enable Workbooks



3. After performing steps 1 and 2, open the file.
4. Click the “Enable Content” button in the yellow bar at the top of the spreadsheet, under the Excel toolbars.
5. Save the file after clicking “Enable Content.”

23

Energy Storage Systems (ESS) Import Reporting

- ESSs (such as batteries) are to be treated similarly to transmission hubs on the physical path for RY2023 & RY2024
 - No ESS losses or lesser of analysis are required
- RY2023 guidance and EPE workbooks will be updated and posted in March
- Any EPE needing to report ESS imports in RY2023 should contact CARB

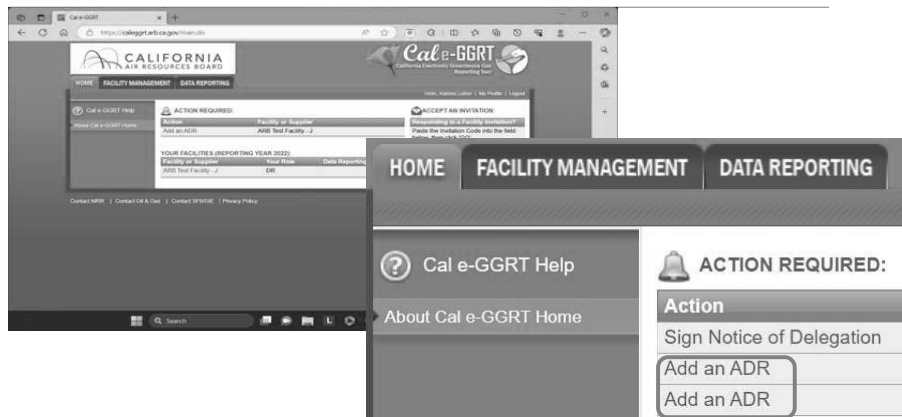
24

Cal e-GGRT Updates

Cal e-GGRT News & Reminders

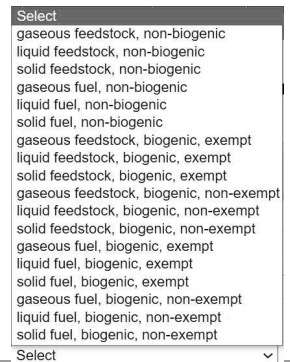
- Tool is now available for 2023 data reporting: <https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT release automatically migrates 2022 data configuration to 2023 reports
- New weblink: <https://caleggrt.arb.ca.gov/login.do>
- Update DR, ADR, Agents (Important!)
- Contact GHG helpdesk if you have questions regarding Cal e-GGRT or QA outreach

Need to Add an ADR



Biogenic Emissions for Hydrogen Production (Subpart P)

- Subpart P now allows biogenic emissions to be reported
- Fuel/Feedstock categories went from 6 choices to 18 choices for both exempt and non-exempt biogenic emissions
- The choice of fuel type in this pull-down will then dictate covered emissions when you upload your XML file for fuel and feedstocks



Blend Fuels for Biogenic Emissions (Subparts C, D, and H)

- Fuel type determines if emissions are covered vs exempt
- Blend Fuels** now include both exempt and non-exempt fuel types
- Several refineries will now more easily be able to report non-exempt biogenic emissions

FUEL BIOGENIC PERCENTAGE
Percentage of Fuel that is Biogenic %

FUEL INFORMATION

Fuel Name* HydroTreat Process Gas (RFG)

Fuel Type*

- Select
- Other (gas)
- Other (liquid)
- Other (solid)
- Blend (gas)
- Blend (liquid)
- Blend (solid)
- Non-Exempt Blend (gas)
- Non-Exempt Blend (liquid)
- Non-Exempt Blend (solid)

More Options for Biogenic Emissions from CEMS

- Subpart H and P now allow non-exempt biogenic emissions to be reported for CO₂ CEMS
- Available within Subparts C and D soon

ANNUAL CO₂ EMISSIONS MEASURED BY THE CEMS

Total annual CO₂ mass emissions (metric tons)

Total annual exempt biogenic CO₂ mass emissions (metric tons)

Total annual non-biogenic CO₂ mass emissions (includes fossil fuel, sorbent, and process CO₂ emissions) (metric tons)

Total annual non-exempt biogenic CO₂ mass emissions (includes fossil fuel, sorbent, and process CO₂ emissions) (metric tons)

Reminder: Choosing a Verification Body

- Entities subject to verification can select a VB at any time

Report	Status	Submitted Date	Certification Date	Verification Date	
2021 Annual Report v1	Ready for Verification	05/12/2022 2:24 PM	05/12/2022 2:24 PM		HTML Excel XML Receipt

VERIFICATION BODY

This report does not require third party verification.

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

Greatest Risks for Mis-reporting

- New reporting entity staff
 - Please keep DR/ADR info up to date so we can contact new staff
 - If you need help, please **reach out!** That's what we're here for
- Assuming previous methods/reported data were correct
- Contact CARB staff to confirm your own understanding of basic reporting requirements

Cost of Implementation Fee Update

- CARB will send COI fee invoices electronically by upload to Cal e-GGRT (e.g., RY2022 accounts for this year), with email notification sent to DRs, ADRs, and the listed Responsible Party
- Please ensure your DR, ADR, and/or Responsible Party for Payment and Email has been updated
- We will not share invoices with parties who are not explicitly affiliated with your current account

CARB ATTACHMENTS

Choose File | No file chosen

File Name
Method-or-Data.docx
999997-2021-FY2023-24_COI_Official_Invoice_Final.pdf
999997-2021-FY2023-24_COI_Detailed_Invoice_Final.pdf

Facility Profile

Physical Address	ARB Test Facility - TEST ONLY Home Street Sacramento CA 95814 USA
Mailing Address	ARB Test Facility - TEST ONLY 1001 I Street Somewhere CA 95818 USA
Billing Address	ARB Test Facility - TEST ONLY 123 Chickaboom Australia CA 95000 USA
Responsible Party for Payment	Hey There
Responsible Party Email	k.bear@tree.com
Responsible Party Phone	3234490999

The Take Home Message

- Reach out to your verifier ASAP and select them in Cal e-GGRT
- No revisions to regulation or guidance documents LMB0 this year
- Lots of resources available online
- Contact CARB for additional guidance, questions about QA Findings, or if any issues arise (<https://ww2.arb.ca.gov/mrr-contacts>)

Slide 34

- LMB0** The Suppliers of Transportation Fuel and NG Fuel Guidance document was updated in March 2023.
Lopez, Mae Beth@ARB, 2023-12-07T19:13:32.705
- HC0 0** Probably not worth mentioning unless you want to highlight the change.
Halm, Chris@ARB, 2023-12-15T02:07:39.940

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>

GHG Reporting Contacts

All questions can be directed to ghgreport@arb.ca.gov

Program / Sector	Contact
Manager – Climate Change Reporting Section	Syd Partridge Syd.Partridge@arb.ca.gov
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	Maebeth Lopez Maebeth.Lopez@arb.ca.gov
Reporting Tool Registration and General Questions	Karen Lutter Karen.Lutter@arb.ca.gov
Electricity Retail Providers and Electricity Marketers	Abajh Singh Abajh.Singh@arb.ca.gov Tess McDermott Tess.McDermott@arb.ca.gov
Fuel and CO ₂ Suppliers (Transportation Fuels, Natural Gas, LPG, and CO ₂)	Smadar Levy Smadar.Levy@arb.ca.gov
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	DJay Patel DJay.Patel@arb.ca.gov
Manager – Greenhouse Gas Verification Section	Ryan Schauland Ryan.Schauland@arb.ca.gov
More contact information at: https://ww2.arb.ca.gov/mrr-contacts	

Questions

