GHG Reporting Kickoff Webinar for 2023 Data

CALIFORNIA
AIR RESOURCES BOARD

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

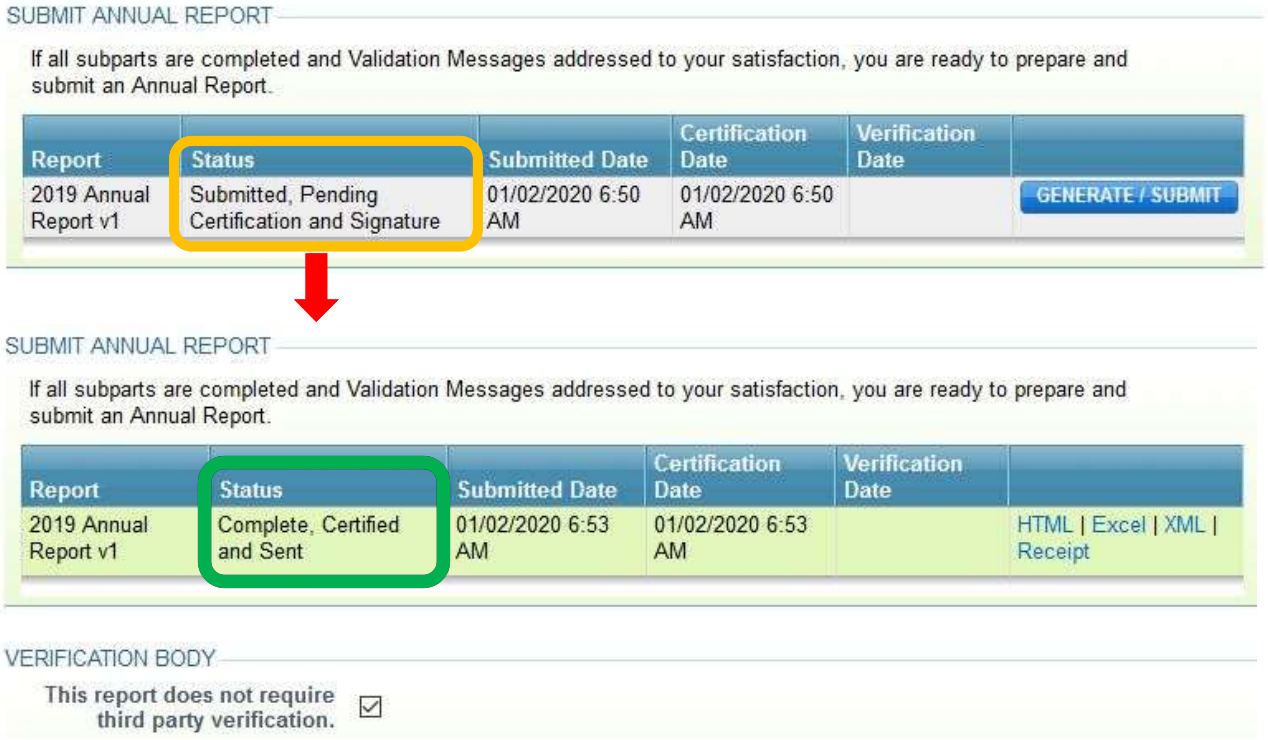
- Initiate verification as soon as possible to allow time for revisions
- Streamline verification:
  - Execute verifier contract prior to report certification
  - Associate your report with your verifier at any time
  - Provide data to verifiers ASAP
  - It is good practice to have a webinar prior to 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

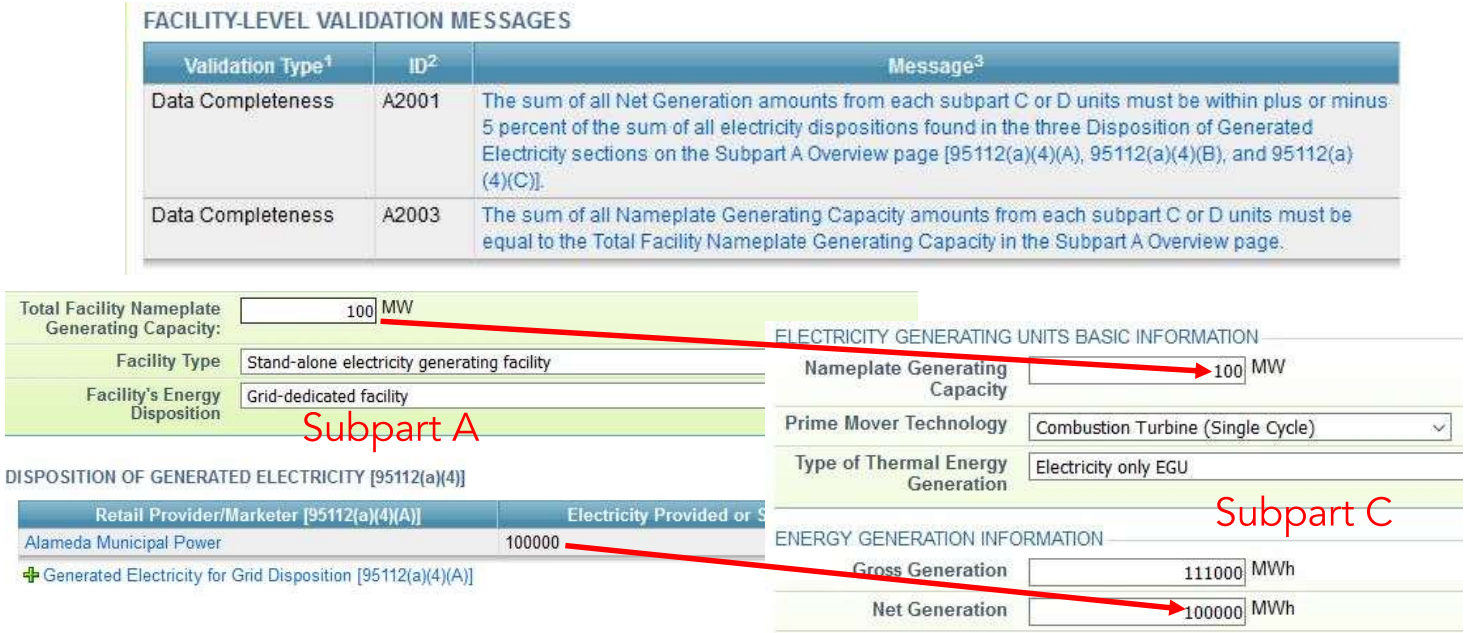
Certifying and Submitting a Report

Ensure your annual emissions data report is "certified" in Cal e-GGRT



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 cannot be certified and submitted with a pending COR**

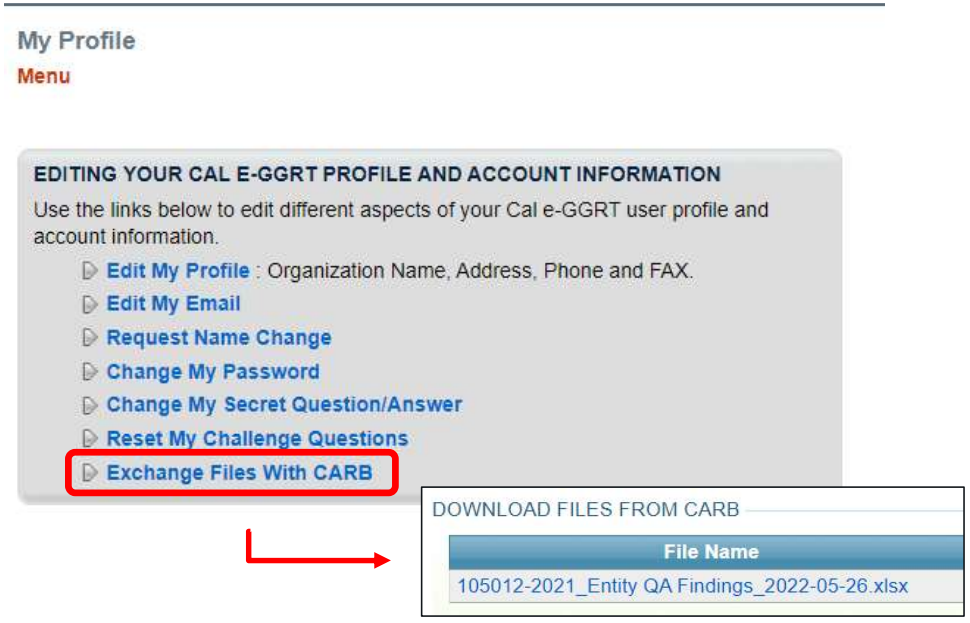
CARB Quality Assurance (QA)

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

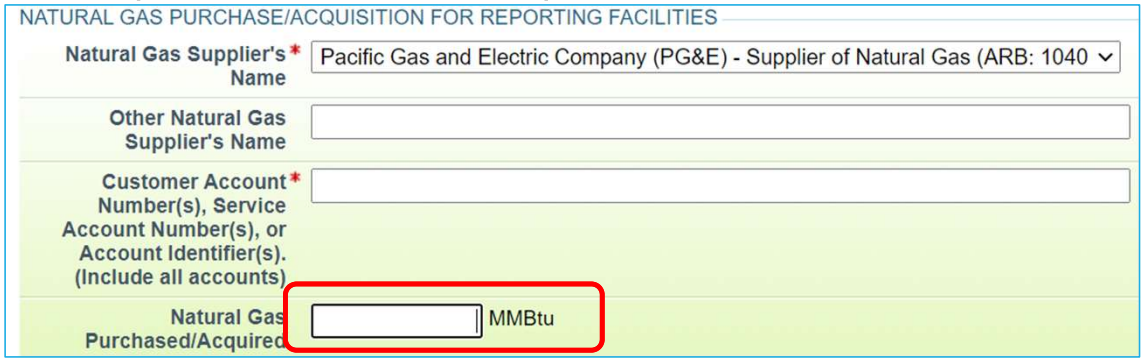
- Entity report is uploaded into the Cal e-GGRT entity account
- User report is uploaded into the Cal e-GGRT user account



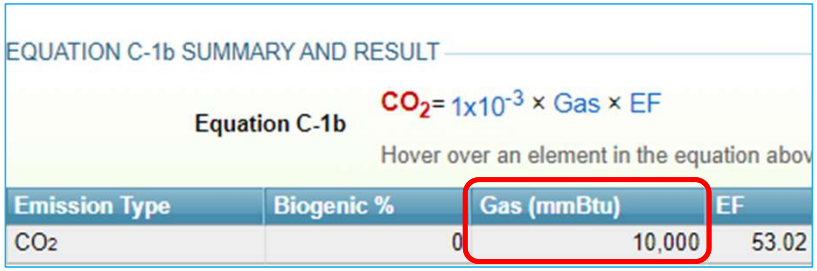
Lessons Learned

Units Combusting Natural Gas

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

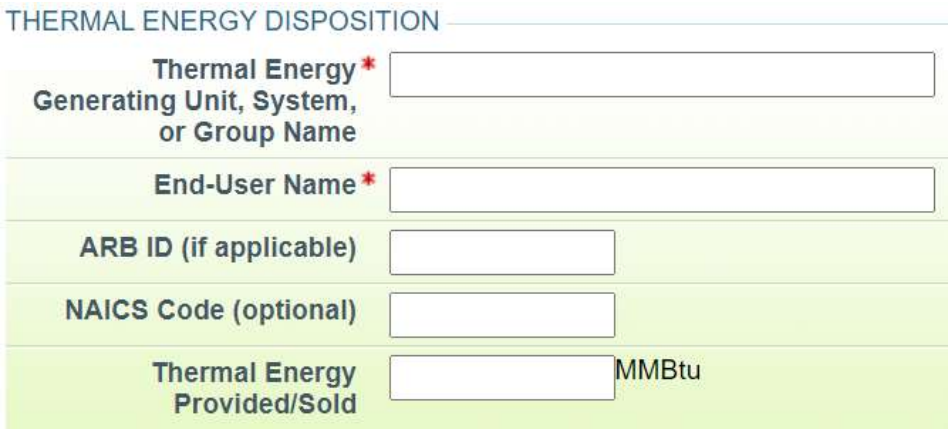


- Match closely with sum of unit-level inputs in Subpart C (or D)



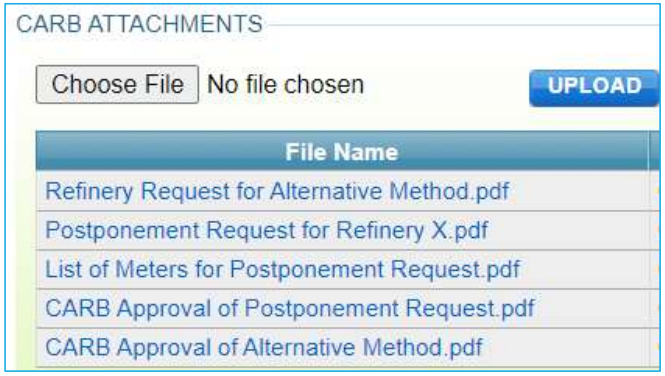
Units Reporting Thermal Energy

- 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



Method Change Requests

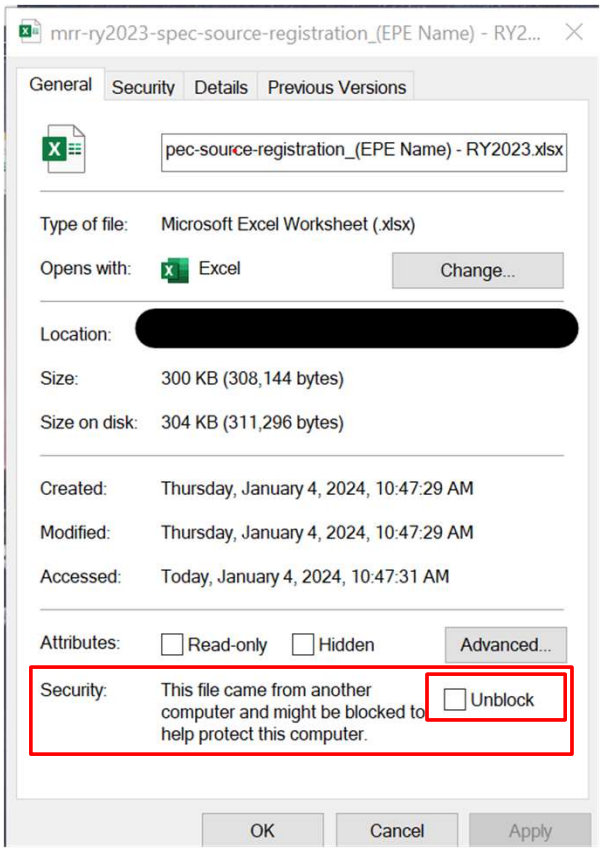
- Section 95103(m) of MRR provides requirements for:
  - Temporary or permanent changes to prescribed methods
  - Alternative measurement and monitoring methods
- Contact CARB if a method change is needed
- Submit requests as soon as possible to facilitate approval in timely manner



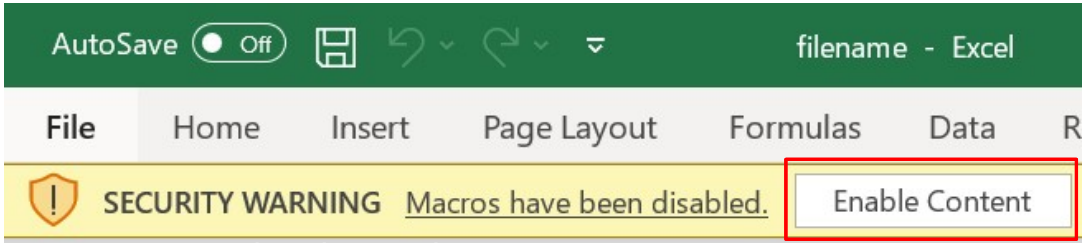
Electric Power Entities (EPE) Guidance Spotlight

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)



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."

Energy Storage Systems (ESS) Import Reporting

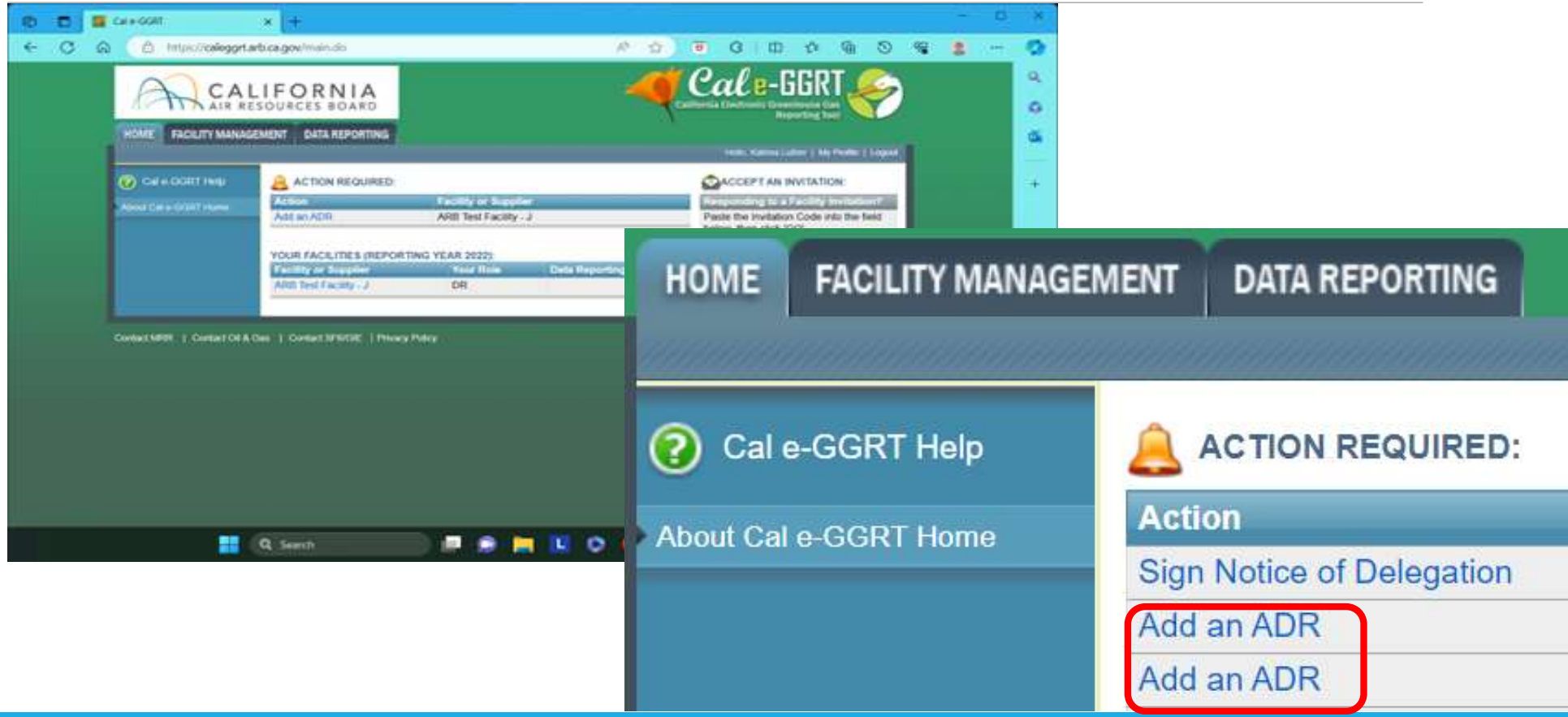
- ESSs (such as batteries) are to be treated similarly to transmission hubs on the physical path for RY2023 & RY2024
  - No ESS losses or lesser of analysis are required
- RY2023 guidance and EPE workbooks will be updated and posted in March
- Any EPE needing to report ESS imports in RY2023 should contact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

Cal e-GGRT Updates

Cal e-GGRT News & Reminders

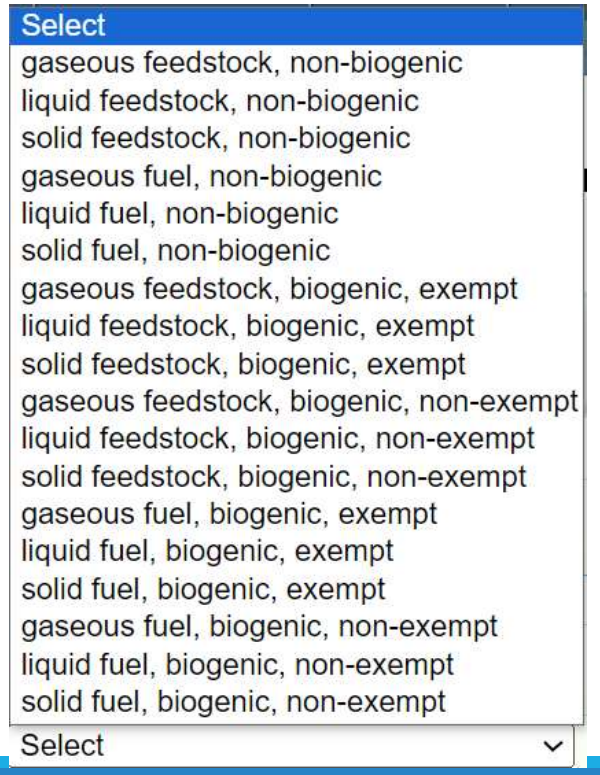
- Tool is now available for 2023 data reporting: https://ww2.arb.ca.gov/mrr-tool
- Cal e-GGRT release automatically migrates 2022 data configuration to 2023 reports
- New weblink: https://caleggrt.arb.ca.gov/login.do
- Update DR, ADR, Agents (Important!)
- Contact GHG helpdesk if you have questions regarding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

Need to Add an ADR



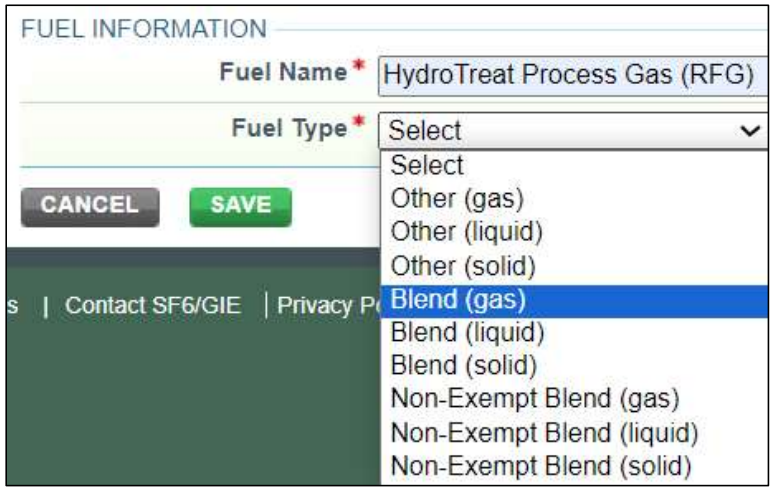
Biogenic Emissions for Hydrogen Production (Subpart P)

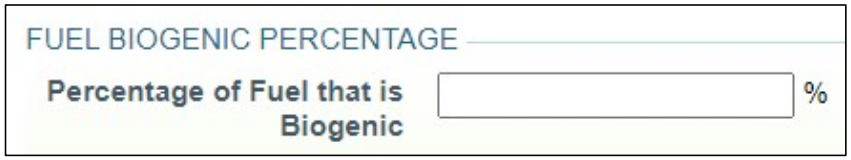
- Subpart P now allows biogenic emissions to be reported
  - Fuel/Feedstock categories went from 6 choices to 18 choices for both **exempt** and **non-exempt** biogenic emissions
  - The choice of fuel type in this pull-down will then dictate covered emissions when you upload your XML file for fuel and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



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

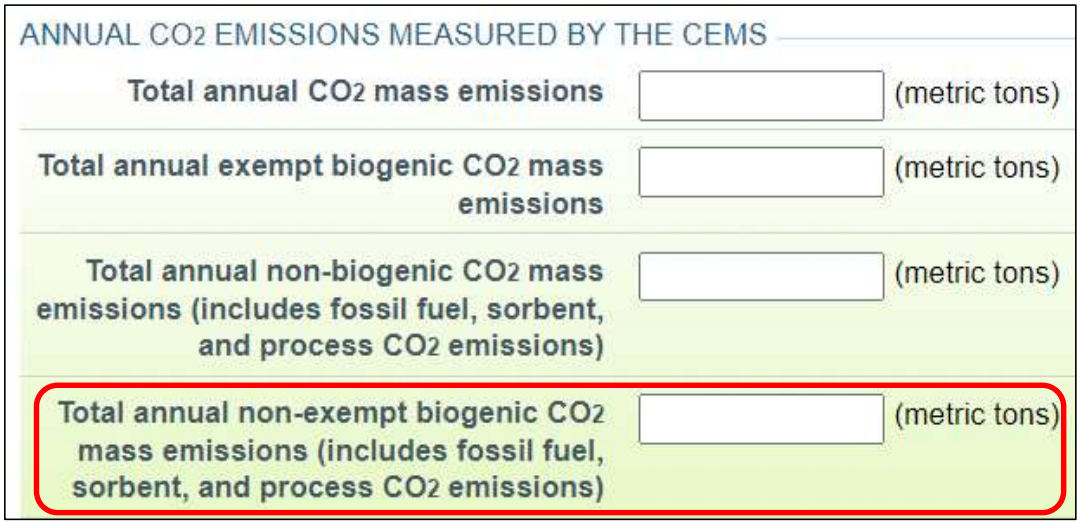
- Fuel type determines if emissions are covered vs exempt
- **Blend Fuels** now include both exempt and non-exempt fuel types
  - Several refineries will now more easily be able to report non-exempt biogenic emissions





More Options for Biogenic Emissions from CEMS

- Subpart H and P now allow non-exempt biogenic emissions to be reported for CO_2 CEMS
  - Available within Subparts C and D soon



ANNUAL CO_2 EMISSIONS MEASURED BY THE CEMS

Total annual CO_2 mass emissions		(metric tons)
Total annual exempt biogenic CO_2 mass emissions		(metric tons)
Total annual non-biogenic CO_2 mass emissions (includes fossil fuel, sorbent, and process CO_2 emissions)		(metric tons)
Total annual non-exempt biogenic CO_2 mass emissions (includes fossil fuel, sorbent, and process CO_2 emissions)		(metric tons)

Reminder: Choosing a Verification Body

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

- 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

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 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)

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