GHG Reporting Kickoff Webinar for 2024 Data



DATE: FEBRUARY 5, 2025

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

Outline

- Overview
- General reporting and verification information
- Facility representatives and accessing Cal e-GGRT for the first time
- Facility change in status
- CARB Quality Assurance
- 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 2025.

2023 Data Reporting Recap

- 836 reports submitted
- 490 verified
 - 99% received positive / qualified positive emissions verification statements
 - 4 set asides
- Reporters not subject to verification: abbreviated reporters or retail providers with no imports/exports
- 2023 summary data posted for all reports here:
 - https://ww2.arb.ca.gov/mrr-data

Key Reporting Dates for 2024 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 2	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
August 11	Regulatory Deadline: Verification statements due (emissions data and product data)

Reporting and Verification Schedule

- RY2024 is the first year of the compliance period.
 - A site visit is required for all reporting entities subject to verification
- Verification statements due by Aug. 11th, 2025
- 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
- Completed enforcement actions related to reporting are 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 2024 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 Cessation of Reporting or Verification: Contact CARB staff before the reporting deadline
- 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

- RY2024 is the first year of the new compliance period and requires a site visit
- New verification body is required every six years
- Be prepared to trace data to its origin
- Ensure GHG Monitoring Plan meets section 95105(c) requirements and include additional info 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

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 verification body at any time
 - Provide data to verifiers ASAP
 - It is good practice to hold a webinar with verifier 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 to ensure timely submittal

Reporting Reminders

- Prior to report submittal in Cal e-GGRT, review your report to ensure emissions and product data are correct
- Don't forget to certify and submit a generated report
 - If your report won't generate:
 - Clear all validation messages
 - Clear a pending Certificate of Representation (COR)
- Maintain up-to-date contact info for facility representatives (DR, ADR, Agents).
 This is the responsibility of the reporting entity.
- 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

Review your Report Prior to Submittal

- Prior to report submittal in Cal e-GGRT, review your report to ensure emissions and product data are correct
 - Check that emissions totals on the Facility/Supplier Overview page match your calculations
 - Review the overall magnitude of emissions
 - Generate the full report and check inputs and other data

Cal e-GGRT Greenhouse Gas Data Reporting (2023)

Select Facility » Facility or Supplier Overview

FACILITY OR SUPPLIER OVERVIEW

This page allows you to add the source and/or supplier categories for which your facility or supplier will be reporting, then to access those data reporting screens using the OPEN buttons.

After data reporting is complete, you can initiate the annual report review and submission process from this page by using the SUBMIT button (or RESUBMIT for subsequent submissions if needed).

Note: The estimated covered emission value is designed only for information purposes as an initial estimate of the reporting entity's covered emissions. This

estimate may not correspond exactly to the final, official compliance obligation assigned to your reporting entity by CARB [pursuant to the Cap-and-Trade Regulation]. CARB will notify each reporting entity of its final, official compliance obligation value in a communication separate from Cal e-GGRT.

A value of *N/A means the covered emissions were calculated externally by CARB, or emissions data have not been reported.

CO2 equivalent emissions (excluding biogenic) from subparts C - AA (metric tons)

Exempt Biogenic CO2 emissions from subparts C - AA (metric tons)

N/A

Estimated covered CO2 equivalent emissions (metric tons)

VIEW GHG DETAILS

REPORT DATA

2023 Sections 95350-95359.1—GHGs from Gas-Insulated Equipment	Validation Messages?	Subpart Reporting
Sections 95100-95108 (Subpart A)—General Information	View Messages	OPEN
Sections 95115, 95112 (Subpart C)—Stationary Fuel Combustion	View Messages	OPEN

Clear Validation Messages

Address Validation Messages on the Facility/Overview page

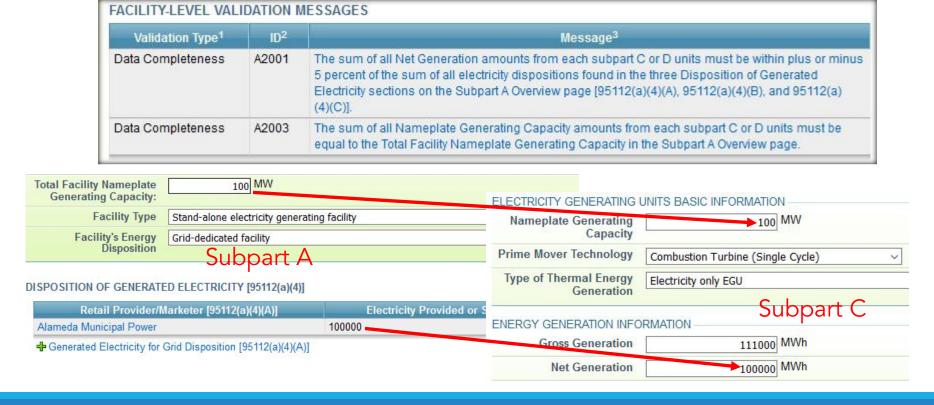
REPORT DATA

2023 Sections 95350-95359.1—GHGs from Gas-Insulated Equipment	Validation Messages?	Subpart Reporting
Sections 95100-95108 (Subpart A)—General Information	View Messages	OPEN
Sections 95115, 95112 (Subpart C)—Stationary Fuel Combustion	View Messages	OPEN

ADD or REMOVE Subparts

Clear Validation Messages: Example

Example: For electricity generating facilities, total facility electricity generation, and total facility nameplate capacity in Subpart A must equal the sum of unit-level electricity generation, and sum of unit-level nameplate capacity in Subpart C (or D)



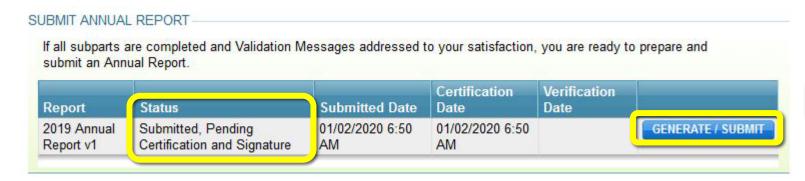
Clear a Pending COR

- A new DR/ADR must sign a Certificate of Representation (COR) to accept their invitation
- An incomplete COR appears under Home tab of invitee's account
- Report cannot be certified and submitted with a pending COR

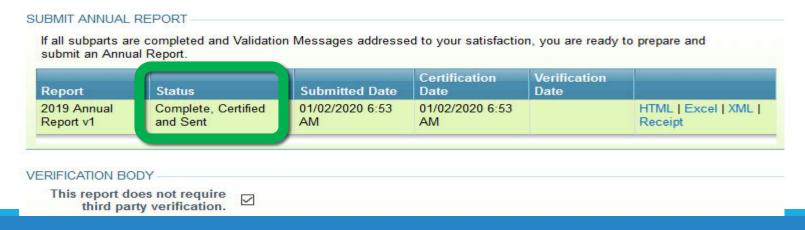


Certify and Submit a Report

Ensure your annual emissions data report is "certified" in Cal e-GGRT. Verifiers can only view your report <u>after</u> it has been submitted and certified





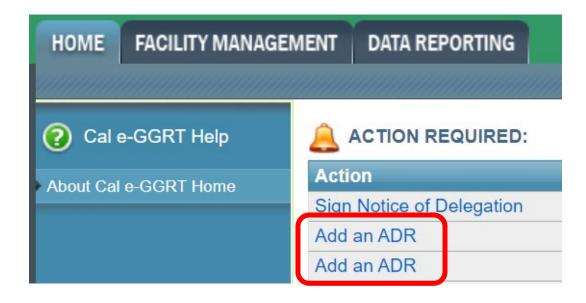


Facility Representatives

Facility Representatives

- Facility Representatives:
 - Designated Representative (DR)
 - Alternate Designated Representative (ADR)
 - Agent(s)
- Maintain up-to-date contact info for facility representatives. <u>This is the responsibility of the reporting entity.</u>
 - Everyone tied to a facility account has access to reported data unless you delete them
 - Assign a new DR before you leave the role
 - Ensure you have an ADR
 - If a deadline is missed due to staff turnover, late reporting violations still apply

DR Needs to Add an ADR



New Cal e-GGRT User Accounts

Create a User Account:

- Follow the new user registration instructions at: https://ww2.arb.ca.gov/sites/default/files/classic/cc/reporting/ghg-rep/tool/cal_eggrt_registration.pdf
- Electronic Signature Agreement (ESA): Email to ghgreport@arb.ca.gov, and mail the hard copy to CARB

Accept Your Role:

- The current DR or ADR adds or edits facility representatives - DR, ADR, or Agent
- Enter in the Invitation Code to accept your role to access the reporting entity account
- CARB staff can assist upon request



Facility Change in Status

Facility – Change in Status

- Ownership or Operational Control:
 - Notify MRR staff promptly via email if your facility is being sold or there are operational control changes.
 - MRR staff will evaluate responsibility for reporting, verification, and C&T compliance (in coordination with C&T staff)
 - Transfers that occur during verification can be complicated, notify CARB as early as possible
 - Send a separate notification to C&T staff: CACITSSRegistrar@arb.ca.gov
- Cessation of MRR Reporting, Verification, or Cap-and-Trade requirements
 - Facilities, suppliers, and electric power entities must notify CARB to determine next steps
 - Timing is important notify CARB as early as possible
 - Notify C&T staff: <u>CACITSSRegistrar@arb.ca.gov</u>

CARB Quality Assurance (QA)

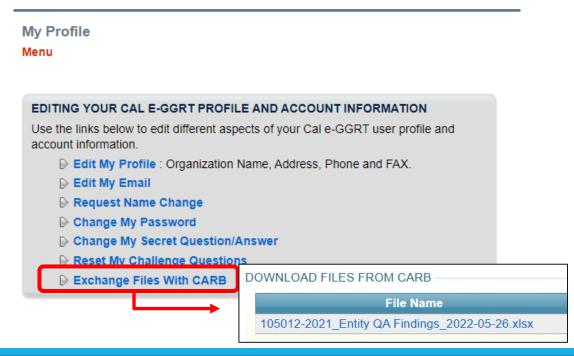
CARB Quality Assurance (QA)

- CARB staff complete QA checks on reported data, which is independent of third-party verification
- Objective: For reporters to prevent errors in the current reporting year or to correct errors prior to verification.
- Communication to reporters and/or verifiers is via direct email, phone call, or findings reports
 - 1. First Quarter Outreach (Proactive):
 - Occurs prior to the April reporting deadline
 - QA findings are based on previous reporting year's data and is intended to prevent errors in current reporting year's report
 - 2. Spring/Summer Outreach
 - Occurs after April and June reporting deadlines but prior to Verification deadline
 - Reactive QA findings based on submitted data for the current reporting year; to correct errors prior to verification

Findings Reports in Cal e-GGRT

- For Spring/Summer QA Outreach on RY2024 reported data
- Entity report is uploaded into the Cal e-GGRT reporting entity account
- User report is uploaded into the Cal e-GGRT user account

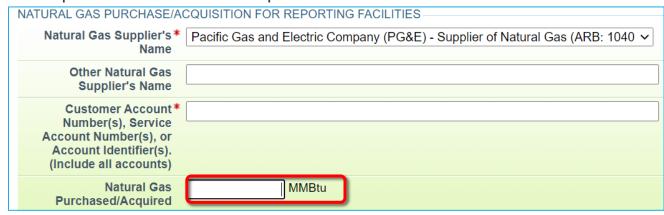




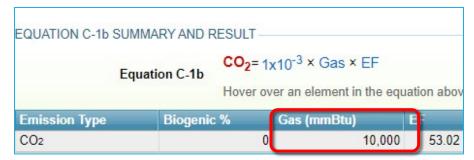
Lessons Learned and Common Errors

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)



Ensure you are reporting NG in the <u>correct units</u> under Subparts A, C (or D)

Clearing Subpart NN Validations

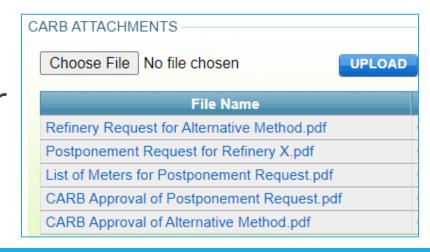
- If you are an importer of natural gas reporting under Subpart NN and are experiencing validation errors (e.g., the validation message does not clear even after you address it)
 - Delete Subpart NN
 - Re-add the subpart
 - Re-enter your natural gas import operations data
 - Check if the validation messages have been cleared

REPORT DATA

2023 Sections 95350-95359.1—GHGs from Gas-Insulated Equipment	Validation Messages?	Subpart Reporting
Sections 95100-95108 (Subpart A)—General Information	View Messages	OPEN
Section 95122 (Subpart NN)—Suppliers of Natural Gas and NGLs	None	OPEN

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



Cal e-GGRT Updates

Cal e-GGRT News & Reminders

- Tool will be available soon for 2024 data reporting: https://ww2.arb.ca.gov/mrr-tool
- Cal e-GGRT release automatically migrates 2023 data configuration to 2024 reports
- Cal e-GGRT: https://caleggrt.arb.ca.gov/login.do
- Contact GHG helpdesk if you have questions regarding Cal e-GGRT or QA outreach

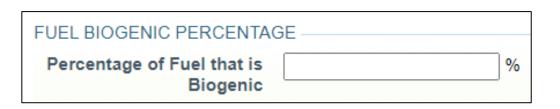
Blend Fuels for Biogenic Emissions (Subparts C, D, and H)

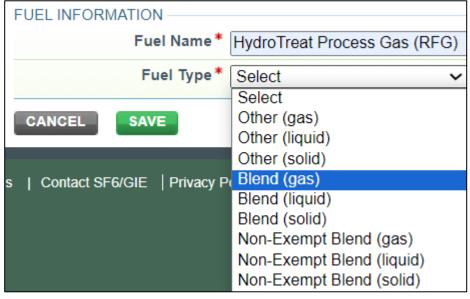
• Fuel type determines if emissions are covered vs exempt

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





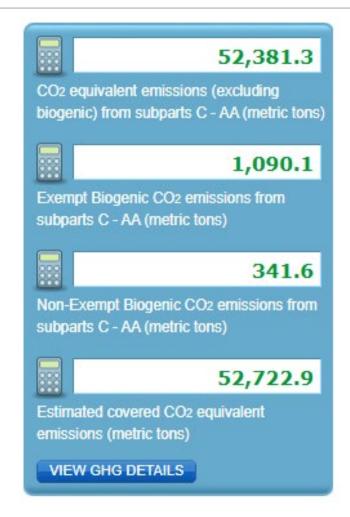
More Options for Biogenic Emissions from CEMS

 Subparts C, D, H and P now allow non-exempt biogenic emissions to be reported for CO₂ CEMS

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)	

Emissions Totals include Biogenic Emissions

- Exempt Biogenic Emissions
- Non-exempt Biogenic Emissions



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
 - Keep relevant MRR data and resources on file
 - 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

 CARB will send COI fee invoices electronically by upload to Cal e-GGRT (e.g., RY2023 accounts for this year), with email notification sent to DRs, ADRs, and the listed Responsible Party



 We will not share invoices with parties who are not explicitly affiliated with your current account



ARB Test Facility - TEST ONLY Home Street Sacramento CA 95814 USA
ARB Test Facility - TEST ONLY 1001 I Street Somewhere CA 95818 USA
ARB Test Facility - TEST ONLY 123 Chickaboom Australia CA 95000 USA
Hey There
k.bear@tree.com
3234490999

MRR Reporting: Take Home Message

- Reach out to your verifier ASAP and select them in Cal e-GGRT
- RY2024 is the first year in the compliance period. A site visit is required.
- Certify/Submit and verify your report early
- Review data entered into Cal e-GGRT prior to report submittal
- Maintain your representatives and contact info up-to-date
- 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 <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 ghgreport@arb.ca.gov

Program / Sector	Contact	
Manager – Climate Change Reporting Section	Syd Partridge <u>Syd.Partridge@arb.ca.gov</u>	
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	Maebeth Lopez <u>Maebeth.Lopez@arb.ca.gov</u>	
Reporting Tool Registration and General Questions	Karen Lutter <u>Karen.Lutter@arb.ca.gov</u>	
Electricity Retail Providers and Electricity Marketers	Abajh Singh <u>Abajh.Singh@arb.ca.gov</u> Tess McDermott <u>Tess.McDermott@arb.ca.gov</u>	
Fuel and CO_2 Suppliers (Transportation Fuels, Natural Gas, LPG, and CO_2)	Smadar Levy <u>Smadar.Levy@arb.ca.gov</u>	
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	DJay Patel <u>DJay.Patel@arb.ca.gov</u>	
Manager – Greenhouse Gas Verification Section	Ryan Schauland Ryan.Schauland@arb.ca.gov	
More contact information at: https://ww2.arb.ca.gov/mrr-contacts		

Questions

