

# GHG Reporting Kickoff Webinar for 2025 Data



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DATE: FEBRUARY 4, 2026

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

# Outline

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- Overview
- General reporting and verification information
- Facility representatives, accessing Cal e-GGRT for the first time
- Facility change in status
- Importance of CARB Quality Assurance
- Lessons learned
- 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 2026](#).

# 2024 Data Reporting Recap

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- 821 reports submitted
- 467 required verification
  - 99% received positive / qualified positive emissions verification statements
  - 1 Assigned Emissions Level (AEL)
- 2024 summary data posted for all reports here:
  - <https://ww2.arb.ca.gov/mrr-data>

# Key Reporting Dates for 2025 Data

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

Date	Activity
<b>April 10</b>	Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting
<b>June 1</b>	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
<b>August 10</b>	Regulatory Deadline: Verification statements due (emissions data and product data)

# Reporting and Verification Schedule

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- RY2025 is the second 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 August 10, 2026
- 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 (§95107)

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- 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

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# 2025 MRR Amendments

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- Staff is proposing amendments to MRR to:
  - Align with, and support California's Cap-and-Invest Regulation, including allocation and the calculation of compliance obligations
  - Ensure that reported GHG emissions and product data are accurate and complete to support California's GHG reduction programs, including the statewide GHG emissions inventory
- 45-day comments must be submitted by March 9, 2026
- Board hearing scheduled for May 2026
- For RY2025 data, continue to adhere to 2018 version of MRR regulation
  - Proposed amendments, if approved by the Board, are applicable for 2027 data reported in 2028, with a few exceptions
- More information: <https://ww2.arb.ca.gov/mrr-regulation>



# MRR and EPA Part 98

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- CARB is aware of EPA's proposal to remove GHG emissions reporting requirements for most source categories under 40 CFR Part 98
- MRR references previous Part 98 versions, which are incorporated by reference, and these incorporated versions are not impacted by EPA action
- Part 98 versions incorporated by reference are available on the MRR regulation page: <https://ww2.arb.ca.gov/mrr-regulation>

# Reporting Tips

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- Use 2018 Mandatory Reporting Regulation to report 2025 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](mailto:ghgreport@arb.ca.gov)
  - Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

# Verification Essentials

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- 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 includes 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

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- 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
  - Hold a remote meeting 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 well in advance of the deadline to decrease risk of an adverse verification statement

# Reporting Reminders

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- 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 (Designated Representative (DR), Alternate Designated Representative (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
- If still unsure, ask CARB staff to review your report

## 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.

CO<sub>2</sub> equivalent emissions (excluding biogenic) from subparts C - AA (metric tons)

Exempt Biogenic CO<sub>2</sub> emissions from subparts C - AA (metric tons)

Estimated covered CO<sub>2</sub> equivalent emissions (metric tons) **N/A**

[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	<a href="#">View Messages</a>	<a href="#">OPEN</a>
Sections 95115, 95112 (Subpart C)—Stationary Fuel Combustion	<a href="#">View Messages</a>	<a href="#">OPEN</a>

# 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	<a href="#">View Messages</a>	<a href="#">OPEN</a>
Sections 95115, 95112 (Subpart C)—Stationary Fuel Combustion	<a href="#">View Messages</a>	<a href="#">OPEN</a>

[+ 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)

FACILITY-LEVEL VALIDATION MESSAGES		
Validation Type <sup>1</sup>	ID <sup>2</sup>	Message <sup>3</sup>
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:	<input type="text" value="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 or S
Alameda Municipal Power	100000
+ Generated Electricity for Grid Disposition [95112(a)(4)(A)]	

ELECTRICITY GENERATING UNITS BASIC INFORMATION	
Nameplate Generating Capacity	<input type="text" value="100"/> MW
Prime Mover Technology	Combustion Turbine (Single Cycle)
Type of Thermal Energy Generation	Electricity only EGU

Subpart C

ENERGY GENERATION INFORMATION	
Gross Generation	<input type="text" value="111000"/> MWh
Net Generation	<input type="text" value="100000"/> MWh



# 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**



The screenshot shows the Cal e-GGRT Home tab interface. At the top, there are navigation tabs: HOME, FACILITY MANAGEMENT, and DATA REPORTING. Below the HOME tab, there is a sidebar with links: Cal e-GGRT Help and About Cal e-GGRT Home. In the main content area, there is a notification titled 'ACTION REQUIRED:' with a bell icon. Below the notification, there is a table with two columns: Action and Facility or Supplier. The table contains one row: Sign Certificate of Representation and KL40 Stage Test.

Action	Facility or Supplier
Sign Certificate of Representation	KL40 Stage Test

# Certify and Submit a Report

Successfully submitted reports have a status of “Ready for Verification” or “Complete Certified, and Sent.” Verifiers can view your report only after it is submitted and certified.

## 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 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 answeri

SUBMIT/CERTIFY →

After clicking the SUBMIT/CERTIFY button, and completing the certification pr via Cal e-GGRT. You will not be able to generate a new report until the certifie Requested by a verifier or CARB staff.

## 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. ☒

# Facility Representatives

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# Facility Representatives

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- Facility Representatives:
  - Designated Representative (DR)
  - Alternate Designated Representative (ADR)
  - Agent(s)
- Maintain up-to-date contact info for facility representatives. This is the responsibility of the reporting entity.
  - 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

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The screenshot displays the Cal e-GGRT web application interface. At the top, there is a navigation bar with three tabs: 'HOME' (highlighted in blue), 'FACILITY MANAGEMENT', and 'DATA REPORTING'. Below the navigation bar, on the left, is a vertical menu with a green question mark icon and the text 'Cal e-GGRT Help', followed by a link 'About Cal e-GGRT Home'. On the right side, there is a section titled 'ACTION REQUIRED:' with a bell icon. Below this title is a table with the following content:

Action
Sign Notice of Delegation
Add an ADR
Add an ADR

The two 'Add an ADR' entries in the table are highlighted with a red rectangular box.

# New Cal e-GGRT User Accounts

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- 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](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](mailto: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



The screenshot shows a web form titled "ACCEPT AN INVITATION:" with an envelope icon. Below the title is a section "Responding to a Facility Invitation?" which contains the instruction "Paste the Invitation Code into the field below, then click 'GO'". There is a text input field and a green "GO" button. At the bottom of the form is a section titled "Cal e-GGRT Announcements".

# Facility Change in Status

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# Facility – Change in Status

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- 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&I compliance (in coordination with C&I staff)
  - Transfers that occur during verification can be complicated, notify CARB as early as possible
  - Send a separate notification to C&I staff: [CACITSSRegistrar@arb.ca.gov](mailto:CACITSSRegistrar@arb.ca.gov)
- Cessation of MRR Reporting, Verification, or Cap-and-Invest Program 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&I staff: [CACITSSRegistrar@arb.ca.gov](mailto:CACITSSRegistrar@arb.ca.gov)



# CARB Quality Assurance (QA)

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- CARB MRR data informs other CARB programs: Cap-and-Invest, GHG Inventory, AB32 Fee Program, and others
- 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

# CARB QA (continued)

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- Pursuant to MRR Regulation section 95107(b), Reporters need to ensure accuracy of reported data
- Mis-reporting of non-emissions MRR data impacts GHG Inventory
- Reporting errors (inaccurate or incomplete data) could trigger enforcement action
- Communication to reporters and/or verifiers:
  1. First Quarter Outreach (prior to April reporting deadline)
  2. Spring/Summer Outreach (prior to Verification deadline)

# Lessons Learned and Common Errors

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# 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 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  $\text{CO}_2 = 1 \times 10^{-3} \times \text{Gas} \times \text{EF}$

Hover over an element in the equation above

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

- Ensure you are reporting NG in the correct units under Subparts A, C (or D)

# 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 in advance of the reporting year if a method change is needed
- Submit requests as early as possible to facilitate approval in timely manner

CARB ATTACHMENTS

No file chosen

File Name
<a href="#">Refinery Request for Alternative Method.pdf</a>
<a href="#">Postponement Request for Refinery X.pdf</a>
<a href="#">List of Meters for Postponement Request.pdf</a>
<a href="#">CARB Approval of Postponement Request.pdf</a>
<a href="#">CARB Approval of Alternative Method.pdf</a>

# Cal e-GGRT Updates

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# Cal e-GGRT News & Reminders

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- Tool will be available soon for 2025 data reporting:  
<https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT release automatically migrates 2024 data configuration to 2025 reports
- Cal e-GGRT: <https://caleggirt.arb.ca.gov/login.do>
- Contact GHG helpdesk if you have questions regarding Cal e-GGRT or QA outreach



# Cal e-GGRT Data Workbooks

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- Data workbooks linked within Cal e-GGRT are now at:  
<https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/reporting-tool/cal-e-ggert-workbooks>

# Data Confidentiality

- In Subpart A reporters can select whether their data contains confidential information
  - If your facility report contains confidential information, please indicate it in your report by checking the box
- CARB does its due diligence to protect data so it cannot be linked to individual reporters; however, we must comply with public records act (PRA) requirements
- Listing which specific data is confidential and why helps CARB in the event of a PRA request

## Sections 95100-95108 (Subpart A): Facility Reporting Information (2024)

[Select Facility](#) » [Facility or Supplier Overview](#) » [Subpart A](#)

### SUBPART A – GENERAL INFORMATION

Each facility or supplier, and for each reporting year is required to supply some basic facility level information, including the entering and reporting of relevant NAICS codes and the entering and reporting of all highest-level United States parent companies.



[Subpart A: View Validation](#)

### DATA CONFIDENTIALITY (REQUIRED)

Do you claim that any of the information in your submission is confidential?

☐ Yes ☐ No

By choosing either Yes or No, I understand the following:

Emissions data is public information as provided in existing law. This is not limited to facility total emissions. **If you selected "No," Non-emissions information including, but not limited to, unit-level operational data, production data, and electricity and fuel purchase and consumption data, may be released to the public in accordance with Title 17, California Code of Regulations (CCR), sections 91000 to 91022, and the California Public Records Act (Government Code Section 6250 et seq.)**

If you selected "Yes" for confidential data, you must briefly describe the reasons for claiming information submitted in your submission as confidential by providing a general description of the data that are considered confidential.


# 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		<a href="#">HTML</a>   <a href="#">Excel</a>   <a href="#">XML</a>   <a href="#">Receipt</a>

VERIFICATION BODY

☐ This report does not require third party verification.

Select 

- 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

# MRR Reporting: Take Home Message

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- Reach out to your verifier ASAP and select them in Cal e-GGRT
- Certify/Submit and verify your report early
- Review data entered into Cal e-GGRT prior to report submittal
- Maintain your representatives and contact info
- Review and update your GHG Monitoring Plan regularly
  - A simplified GHG Monitoring Plan is recommended for Abbreviated Reporters with a history of reporting inaccurate or incomplete data
- Contact CARB for additional guidance, questions about QA Findings, or if any issues arise (<https://ww2.arb.ca.gov/mrr-contacts>)

# Resources

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- Email reporting questions to: [ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov)
- Email verification questions to: [ghgverify@arb.ca.gov](mailto: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](mailto:ghgreport@arb.ca.gov)

Program / Sector	Contact
Manager – Climate Change Reporting Section	Syd Partridge <a href="mailto:Syd.Partridge@arb.ca.gov">Syd.Partridge@arb.ca.gov</a>
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	GHG Helpdesk <a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a>
Reporting Tool Registration and General Questions	GHG Helpdesk <a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a>
Electricity Retail Providers and Electricity Marketers	Tess McDermott <a href="mailto:Tess.McDermott@arb.ca.gov">Tess.McDermott@arb.ca.gov</a>
Fuel and CO <sub>2</sub> Suppliers (Transportation Fuels, Natural Gas, LPG, and CO <sub>2</sub> )	Maebeth Lopez <a href="mailto:Maebeth.Lopez@arb.ca.gov">Maebeth.Lopez@arb.ca.gov</a>
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	Djay Patel <a href="mailto:DJay.Patel@arb.ca.gov">DJay.Patel@arb.ca.gov</a>
Manager – Emissions Data Quality Assurance (Verification) Section	Ryan Schauland <a href="mailto:Ryan.Schauland@arb.ca.gov">Ryan.Schauland@arb.ca.gov</a>
More contact information at: <a href="https://ww2.arb.ca.gov/mrr-contacts">https://ww2.arb.ca.gov/mrr-contacts</a>	

# Questions

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