



RY2024 MRR Kick-Off Webinar for Electric Power Entities

March 11, 2025

2023 EPE Data Reporting Recap

- 108 EPE reports submitted
 - 107 received positive / qualified positive emissions verification statements
 - CARB conducted 8 EPE verification audits
- 2023 summary data posted for all reports here:
 - <https://ww2.arb.ca.gov/mrr-data>
- **1 Adverse Statement & 3 Set-asides**

Linkage

- The Cap-and-Trade Program has been linked with Québec since 2014
- California, Québec and Washington have announced interest in exploring potential linkage with Washington's Cap-and-Invest Program
- Linkage with Washington would require multiple steps including Governor's findings and a rulemaking process
- Current MRR reporting provisions have not changed
- Contact CARB immediately if you encounter any issues related to reporting similar data to two different GHG programs or if your data collection/processing has changed
 - Reporting methodology change requests require several months of iterative review time

Case Study I: Adverse Verification Statement

- Verifiers are required to submit an adverse verification statement (VS) if they can't submit a positive or qualified positive VS at the deadline
- Make sure you are in close communication with your verifier & you answer their questions in a timely manner
 - **Goal:** All issues that impact the VS must be resolved by the deadline
 - Verifiers must notify CARB of possible adverse VS 14 days before the deadline at latest
- Adverse results in assigned emission level (AEL) [§95131(c)(5)]. AELs can't always be accurate, but may be conservative resulting in higher emissions costs as well as potential enforcement

Case Study II: EIM Set-aside

- If you have *any* affiliation with CAISO's energy imbalance market (EIM):
 - It's extremely likely EIM participant EPEs will have CA imports to report, even if CAISO did not explicitly inform you of this
 - Be aware of your EPE's EIM participation status
 - Only CAISO can provide the data you need to report to CARB
 - **Contact us for CAISO contact details**
 - Start requesting and sourcing data early – it can take some time and a few tries to get it right

Case Study III: First Deliverer Set-aside

- ONE contains many checks and back-stops but is not fool-proof
- Read the instructions in every column to understand if two responses may be incompatible
 - Contact us if you are unsure what we are asking for in any field
- “First deliverer” means those imports and emissions are the reporting EPE’s
 - **New** built-in first-deliverer check by formula
 - If you claim first-deliver you can’t list a first deliverer and vice-versa
 - Will prohibit submission

First Deliverer Assessment	
<p>Are YOU the PSE on the NERC eTag in the Physical Path table on the last California border crossing, or meet the first deliverer definition in §95102?</p> <p style="color: red;">Answer "yes" in this column if you are the First Deliverer.</p>	<p>Name of the First Deliverer?</p> <p style="color: red;">Select an EPE in this column only if you answered "No" in Column Q (e.g., you are not the First Deliverer.) Leave blank if you are the First Deliverer.</p> <p>Select from dropdown; if unlisted enter name into cell</p>
Are_You_First_Deliverer	First_Deliverer_Listed

Enforcement

- Late reports, set-asides, and Assigned Emission Levels (AELs) could be subject to enforcement
- Additional penalties may be leveled in accordance with both MRR and C&T regulations over and above costs for new verifiers and re-verification

CARB QA Checks Limitations

- CARB QA conducts QA checks right after the June deadline and in mid-July
- These checks are designed to identify most common errors but are limited by the data we have access to - **trust but verify**
 - Verifiers are supposed to check if CARB QA findings are correct and to conduct their own reviews as documented in sampling plan
 - Can follow-up with CARB for clarification or re-check
 - Verifiers are required to reach their own, independent conclusion of reasonable assurance of no material misstatement and report conforms to MRR requirements
- CARB checks are generally *minimum* checks
 - Over-reporting is seldom a finding for our QA checks
 - CARB QA checks can miss non-reporting/null values
 - Some QA checks have thresholds for being a finding based on reporter/verifier feedback
- **Ultimately the onus to report accurately and completely is *always* on the reporting entity**

Control Total Updates

- OATI Control Totals will now have split bilateral Totals from EIM ETSRs
 - All '2-2_OATI_MWh' findings must now be corrected even if you are a EIM participant!
 - Totals are a minimum reporting check – only receive findings if you under-report!
- We do not have resolved totals – we receive just one MWh number for each PSE for of the following:
 - OATI – Imports (with ETSRs removed from total)
 - OATI – Exports (with ETSRs removed from total)
 - OATI – Wheels
 - CAISO – EIM Deemed Total
- If you have issues reporting the minimum control total amounts please contact OATI directly – or contact us for OATI contact information

Lessons Learned

- Rapid changes in electricity markets can result in new reporting issues that require CARB guidance to resolve
- CARB can provide guidance... but we need time for review
 - Lack of review time may result in temporary guidance to continuing reporting as per normal till next year
- Consider costs of verification/set-asides and/or compliance when reporting
 - Over-reporting is still not accurate
- CARB generally defers to verifier concerns – make sure you attempt to resolve them or an adverse may be warranted

Verification Timing

- Three things needed for verification to begin:
 - VB has submitted a conflict of interest (COI) that has been approved (quick turnaround from CARB)
 - EPE has associated their account with the VB (anytime even before report is submitted)
 - EPE submits report
- Verification doesn't have to wait till June 1
- CARB will be sympathetic to verifier concerns that incomplete reports are being submitted to meet the reporting deadline and holding up verifications

When Experiencing Issues with ONE

- Make sure to check the instructions in the Overview tab
 - A common issue is for the file to not be "unblocked" and "enabled;" instructions for doing this are in the Overview tab

Instructions for the Use of This Reporting Workbook

Please note that there has been a Windows security update that requires any downloaded EPE workbook (this includes the SSR workbook as well as the ONE, TWO, and FOUR workbooks) to be both "unblocked" and "enabled" before the macros in the workbook will work correctly. Please perform the following steps before attempting to use any downloaded EPE workbook, and if you encounter any issues when using the workbook, please make sure the following steps have been performed.

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

When Experiencing Issues with ONE

- Make sure to check the instructions in red at the top of some columns

First Deliverer Assessment	
<p>Are YOU the PSE on the NERC eTag in the Physical Path table on the last California border crossing, or meet the first deliverer definition in §95102?</p> <p>Answer "yes" in this column if you are the First Deliverer.</p>	<p>Name of the First Deliverer?</p> <p>Select an EPE in this column only if you answered "No" in Column Q (e.g., you are not the First Deliverer.) Leave blank if you are the First Deliverer.</p> <p>Select from dropdown; if unlisted enter name into cell</p>
<p>Are_You_First_Deliverer</p>	<p>First_Deliverer_Listed</p>

When Experiencing Issues with Cal e-GGRT

- Always check the upper right-hand corner of Cal e-GGRT for alerts first
- These alerts can appear in the Facility Management and Data Reporting pages for your EPE report
- There is always a hold on a Cal e-GGRT reporting entity account when roles are changed
- Take the action described in the message given by Cal e-GGRT

MY FACILITIES | FACILITY SUMMARY | Hello, Tess McDermott Swanson | My Profile | Logout

Cal e-GGRT Help
About Facility Management

EPE Test Facility - EPE (2023)

Facility Summary

Cal e-GGRT FACILITY SUMMARY

From this summary page, depending upon your role, you can make changes to the "Facility Profile" information, the facility's representatives Designated Representative (DR) and Alternate Designated Representative (ADR), and to your Agents if you are a DR or ADR.

NOTE: When a DR or ADR is modified, the Agents associated with that DR or ADR (as shown on the right of the screen), are removed from the reporting account. The new DR or ADR must reassign affected Agents to the account (by using + Add Agent, below) to restore their access.

Pending: The Certificate of Representation has a pending change preventing further changes to the facility or supplier's representatives or profile. The new Alternate Designated Representative Tess McDermott must use the invitation/acceptance code which was emailed to them on Monday, January 27, 2025.

[Resend Invitation \(Please click once\)](#)

When Experiencing Issues with Cal e-GGRT

- Make sure to upload all EPE reporting workbooks (**ONE, TWO, THREE, FOUR**) to the EPE Subpart **ONLY**
 - There is a new restriction in uploading ONE to Subpart A – 'xism' files are invalid to prevent incorrect uploads
- Make sure you check all validation errors before generating your report – not all prohibit submission, but all must be addressed by the verification deadline
- Below is an example of the validation messages for ONE uploaded to 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](#)

SCREEN ERRORS

 Invalid file type - the file name must have a .jpg, .png, .tif, .pdf, .doc, .docx, .ppt, .pptx, .xls, or .xlsx extension.

SUBPART-LEVEL VALIDATION MESSAGES

Validation Type ¹	ID ²	Message ³
Data Completeness	EPE002	You have not uploaded a completed ONE spreadsheet file.



EPE: [View Validation](#)

Certify and Submit a Report

- Don't forget to certify and submit a generated report
- Upload ONE to Subpart EPE otherwise you have not properly submitted your report
- If your report won't generate, remember to check the upper right hand corner of your EPE's Data Reporting page for:
 - Validation messages
 - Pending Certificate of Representation (COR) hold due to representative change

2) DOWNLOAD APPLICABLE FORM(S)

- ▶ ONE - EPE Importers and Exporters
- ▶ TWO - EPE Supplementary Data for MJRP
- ▶ THREE - EPE Supplementary Data for WAPA and DWR SWP
- ▶ FOUR - EPE Optional Asset Controlling Supplier Report

3) UPLOAD ONE - EPE IMPORTERS AND EXPORTERS


Please upload your completed ONE - EPE Importers and Exporters spreadsheet here.

Choose File no file selected

UPLOAD

Certify and Submit a Report

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

 **EPE: No Validation Messages**

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 to submit and certify your report electronically (entering your password and answering security questions).

[SUBMIT/CERTIFY →](#)

After clicking the SUBMIT/CERTIFY button, and completing the certification process via Cal e-GGRT. You will not be able to generate a new report until the certification is 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.

Cal e-GGRT Tool Availability

- ONE workbook is **almost** live
 - <https://ww2.arb.ca.gov/mrr-epe>
- TWO and FOUR workbooks will be sent to MJRP/ACS entities
- Electric Power Entity module is **almost** live!
 - <https://ssl.arb.ca.gov/Cal-eGGRT/login.do>

2025 Reporting & Verification Schedule

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

Date	Activity
June 2 (due to weekend)	EPE & Retail Sales Reporting Deadline §95103(e)
2 nd week of June:	1 st QA results
Early July	2 nd QA results
July 17	REC Retirement Deadline for Eligible RPS Adjustments EPEs must certify RECs as retired in the workbook 45 days after the reporting deadline per this date §95111(g), so verifiers may need to unlock report
July 28	Latest 14-day deadline for notification of possible adverse verification statement (CARB recommends much earlier notification)
August 11 (due to weekend)	Final verification statements and reports due §95103(f)

Reporting Tips

- Use 2018 MRR to report 2024 data:
<https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2020-4-3.pdf>
- CARB EPE guidance materials located here:
<http://ww2.arb.ca.gov/mrr-epe>
- Contact CARB for any questions about requirements (ghgreport@arb.ca.gov or ghgverify@arb.ca.gov)
 - Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

Resources

- Email reporting questions to: ghgreport@arb.ca.gov
- Email verification questions to: ghgverify@arb.ca.gov
- Reporting Guidance for EPEs
<https://ww2.arb.ca.gov/mrr-epe>
- Cal e-GGRT Tool Training
<https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT Main Help Page
<http://www.ccdsupport.com/confluence/display/calhelp/Home>
- Accredited Verification Bodies
<https://ww2.arb.ca.gov/mrr-vb>
- ONE video tutorial
- https://youtu.be/IP_I_L8ijl8

GHG Reporting Contacts

Program / Sector	Contact
General Reporting Requirements, Reporting Helpdesk	ghgreport@arb.ca.gov
General Verification Requirements, Verification Helpdesk	ghgverify@arb.ca.gov
Manager - Climate Change Reporting Section	Syd Partridge 916.750.0361
Manager - Emissions Data Quality Assurance Section (Verification)	Ryan Schauland 279.842.9017
MRR Electricity Retail Providers & Electricity Marketers Specialists	Tess McDermott 916.272.0049
	Abajh Singh 279.208.7116
Reporting Tool Registration and General Questions	Karen Lutter 279.208.7739
More contact information at: https://ww2.arb.ca.gov/mrr-contacts	

Questions

