RY2021 MRR Kick-Off Webinar for Electric Power Entities

March 8, 2022

Outline

o Overview

o General Reporting & Verification Information

o EPE Reporting

o Guidance Spotlight (**NEW!**)

o EPE Data Quality Assurance

o Contacts & Questions

CARB

2020 EPE Data Reporting Recap

o 154 reports submitted

o 102 verified

   o 100% received positive / qualified positive emissions verification statements

   o CARB conducted 10 EPE verification audits

o 2020 summary data posted for all reports here:

   o https://ww2.arb.ca.gov/mrr-data

CARB

Reporting & Verification Schedule 2022

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

Date	Activity
June 1	EPE & Retail Sales Reporting Deadline §95103(e)
1st week of June:	1st QA results
July 18 (due to weekend)	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
Late July	2nd QA results
July 27	Latest 14-day deadline for notification of possible adverse verification statement (CARB recommends much earlier notification)
August 10	Final verification statements and reports due §95103(f)

General Reporting & Verification Information

COVID-19 Concerns

o CARB expects all reporting requirements will be met – the regulation has not changed as a result of COVID

o Any issues that reporters or verifiers are having in meeting MRR requirements, as a direct result of COVID, are being reviewed by CARB on an individual basis

　　o Reach out to CARB as early as possible

CARB

Reporting Tips

o Use 2018 MRR to report 2021 data: https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2020-4-3.pdf

o CARB EPE guidance materials located here: http://ww2.arb.ca.gov/mrr-epe

o Contact CARB for any questions about requirements (ghgreport@arb.ca.gov)

  o Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier

CARB

Reporting Tips

o Full verification year (1st year of compliance period). **Site visits required for everyone!**

o Start early, finish early, and involve verifiers as soon as possible

- o Some reporters are reaching the 6-year time limit with the same verification body and must hire a new verifier. Contact CARB if unsure.
- o Complete and accurate data must be submitted by the reporting deadline

o Update DR, ADR, Agents as needed

- o Old employees, etc., have access to system until you remove them
- o Suggest at least DR and at least one ADR or agent as primary points of contact for CARB

CARB

Verification Overview & Best Practices

○ Verifier keeps a detailed sampling plan [§95131(b)(7)]
  ○ Prepare draft sampling plan in advance of core verification activities and ensure that your review is well-documented
  ○ Update sampling plan to describe how identified risks were addressed
○ Document cross-checks, raw data sampling and query review, and your own calculations [§95131(b)(6),(8)]
  ○ MRR is moving to AR4 GWPs for RY2021 data onward! Please update any internal checks/equations/calculations
    ○ For data years 2021 and onward, the GWP values are as specified in the Table A-1 to Subpart A of Title 40 Code of Federal Regulations Part 98 as published to the CFR on 12/11/2014 [§95102 definition of "Global Warming Potential"]
  ○ The updated GWP values are reflected in the emission factors CARB staff have calculated
○ MRR requires all issues communicated by CARB to be included in the issues log §95131(b)(11), as well as all modifications to the report made after the initial certification

CARB

Verification Tips for Reporters

o Engage with a verifier as early as possible to allow adequate time to schedule site visits & revise data based on verification findings

o Associate your report with your verifier at any time (even if report is not yet certified)

o Correctable errors must be fixed
   o If not, the verifier must submit an adverse statement for errors that affect covered emissions

o If the verifier and reporter disagree on requirements, always contact CARB for assistance

o Ensure the GHG inventory program meets the requirements of §95105(d) and includes helpful information
   o Robust description of key personnel and procedures
   o Provide copy to verifier as soon as possible

o Provide all CARB written clarifications for reporting to verifier

o Reporters can improve the process:
   o Ensure a contract is in place prior to report submission
   o Provide data to verifiers ASAP after report submission
   o Schedule a webinar before site visits in June or earlier

o Ask questions of CARB early to ensure sufficient time to address issues

CARB

Enforcement Summary

o Issues that could lead to enforcement include:
- o Incorrect data submitted
- o Errors leading to a material misstatement (includes errors present at the reporting or the verification deadline)
- o Failure to fix correctable errors
- o Late reports or failure to report
- o Late verification or no verification
- o Any submitted errors that affect compliance obligations/instruments

o CARB has completed enforcement actions related to reporting, and continues enforcement activities

o As completed, case settlements are posted here:

o https://ww2.arb.ca.gov/resources/documents/mrr-enforcement

A Refresher...
EPE Reporting – ONE Workbook

ONE: Form & Function

o No new updates from last year

o Single file direct upload - just upload the excel file straight to the tool as is!

o We appreciate any and all feedback related to using ONE

o A 'How-to' training video for ONE is available at: https://youtu.be/IP_I_L8ijI8 (non-searchable video)

CARB

ONE: Data Integrity

o Almost every green cell has a validation

  o Copy-paste can override validations, but…

o Secondary validations in locked auto-populated cells only except responses from in-cell dropdowns

  o Formulas provide real-time feedback and

  o "Verify Entry" in any cell indicates data entry errors that will prevent submission in the tool

o No more custom response fields!

o ONE is completely password protected so overriding errors, formulas, or coercing data entry is restricted to CARB staff

CARB

14

ONE: Usability & Aesthetics

- Clean interface & updated layout with standardized text responses
- No reg amendments = no new reporting requirements
- Field directions updated for clarity
- Ability to filter tables
- No more add/remove row macros
  - Fixed number of rows based on max from last decade of reporting
  - If additional rows required, contact CARB immediately – requires at least 5 business days to process

CARB

Guidance Spotlight
RPS Adjustment & CAISO Sales

EPE Guidance

o As a reminder, CARB has provided two guidance documents for EPEs, which are unchanged for 2021 reporting:

   o EPE FAQs: https://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-power/epe-faqs_2021.pdf

   o RPS Adjustment: https://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-power/rps-adj-guidance_2021.pdf

o We want to highlight a couple areas where we have received questions, etc.

CARB

RPS Adjustment

- All REC serials used to claim an RPS Adjustment must be "designated as retired for the purpose of compliance with the California RPS program," [§95111(g)(1)(M)(1)]
  - RECs that are not retired for RPS compliance are not eligible for the RPS adjustment – verifiers should check for this
- In WREGIS, RECs can be unretired or moved within 12 months
  - Reporters are required under MRR to report any RECs that were previously submitted and are no longer eligible as 'Withdrawn' in the 'REC Serial' tab of ONE
  - Verifiers should check any RECs reported for RPS adjustment in the preceding year for continued compliance
- CARB will periodically check for REC eligibility
- Potential for enforcement as RPS adjustment affects covered emissions and compliance obligations

CARB

RPS Adjustment Requirements
§95852(b)(4) & §95111(g)(1)(M)

New Field

REC STATUS Retired in WREGIS or subsequently Withdrawn **Leave blank if not yet retired**	REC RETIRED/WITHDRAWN DATE Date RECs Retired in WREGIS/Withdrawn from Subaccount **Leave blank if not yet retired** *Input Format MM/DD/YYYY*	DELIVERY **No RPS adjustment may be claimed for an eligible renewable energy resource when its electricity is directly delivered**	REC Vintage *Input Format YYYY*	ELIGIBLE RPS ADJUSTMENT **Remove any ineligible line items before verification statement is issued**	**Withdrawn RECs Only** **Data Year in which the Withdrawn REC(s) was taken as a RPS Adjustment** *Input Format YYYY*	Will the REC Serials be included with your filing? REC Serial Numbers must be provided in the "REC Serial" tab. *If REC Serial Numbers will not be uploaded to Cal e-GGRT you cannot claim this adjustment - remove line items*
REC_Status	REC_Date	Delivery_Method	REC_Vintage	ible_RPS_Adjus	REC_Withdrawn_EDR_Year	REC_Serial_Number_Included

Old cells, additional functions

CARB

19

CAISO Sales

o "An EDU must report whether any electricity from any resource in its portfolio, for which an EDU has a compliance obligation, was sold into CAISO markets to ultimately serve any non-native load… Excess electricity that does not serve an EDU's native load, and meets the other requirements in this section, is reportable as CAISO sales…"

- o May include sales in the EIM

o Retroactive reporting is possible within a compliance period if errors in previous years are identified

- o Potential for enforcement as CAISO sales affects the use of compliance instruments

o Per MRR, CARB can only provide EFs for non-CA resources, verifiers must review for conformance any CA resource EF calculations reported by EPEs (see EPE FAQ 5.7)

o Review EPE FAQs and contact CARB for clarification or if you have any questions

CARB

General Reporting

o Transactions/Imports are still reportable even if e-Tags are not generated. Verifiers should request evidence from EPEs as to whether there are any un-tagged (metered or EIM) imports and whether they have been accounted for

o Other than ACSs listed at https://ww2.arb.ca.gov/mrr-acs, MRR does not recognize any system emission factors anywhere in reporting, including CAISO sales

CARB

EPE Quality Assurance System

CARB EPE Quality Assurance Process

- CARB intends to have 2 rounds of QA, with the first occurring following the June 1 deadline, and the second occurring after the RPS retirement deadline
  - CARB will also track responses to QA findings communicated to us between the 1st & 2nd rounds so as to not reissue QA findings that have been addressed or are false positives
- The results of CARB's QA will be uploaded to Cal e-GGRT under "CARB Attachments"
- Both reporters & verifiers will be notified via email if any issues are identified through the QA process
  - CARB will communicate QA via email notification to all affected EPE Cal e-GGRT contacts
  - If you manage more than one EPE account, please go into the tool and review all of them
- Reminder: CARB QA does not take the place of verification. CARB QA provides systematic review but can never replicate verification

CARB

QA Issue Resolution

For Reporters

- Review the QA results that are uploaded to the 'CARB Attachments' section of your reporting account in the tool
  - If an identified issue requires correction, work with your verifier to revise report
  - If the issue has already been resolved or does not require correction, communicate this with your verifier
  - Check with your verifier or CARB if you do not understand any identified issues

For Verifiers

- Record all issues in the Log of Issues!
- Work with your reporter as you normally do to resolve all issues
  - Resolutions must be provided for all issues in the issues log even if some did not require correction
  - Check with CARB if you have any questions

CARB

Cal e-GGRT Tool Availability

o ONE workbook is **LIVE!**

    o https://ww2.arb.ca.gov/mrr-epe

o New TWO and FOUR workbooks will be sent to MJRP/ACS entities

o Electric Power Entity module goes live March 15!

    o https://ssl.arb.ca.gov/Cal-eGGRT/login.do

CARB

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

CARB

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	

CARB

Questions