

# Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

## GHG Reporting For 2016 Data

### Electric Power Entities

March 14, 2017

Presentation slides available here:

<http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance-training.htm>

# Outline

- ▣ Overview
- ▣ General Reporting and Verification Information
- ▣ Guidance Document Updates
- ▣ Cal e-GGRT and Workbook Updates & Review
- ▣ Questions

# Overview

# 2015 Data Reporting Recap

- ▣ 804 reports submitted
- ▣ 516 verified
  - ▣ 99+% received positive or qualified positive emissions verification statements
  - ▣ Other reports not subject to verification (abbreviated or retail provider with no imports/exports)
- ▣ 2015 summary data posted for all reports
  - ▣ <http://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/ghg-reports.htm>

# Reporting Schedule

- ▣ June 1, 2017
  - ▣ Reports due for EPEs and electricity retail providers
  - ▣ **No time extensions**
- ▣ Failure to submit a report by the required deadline is a violation of the regulation for each day the report is late
- ▣ Key Dates Reference Page:  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-dates.htm>

# Verification Schedule

- Must be completed by September 1, 2017
  - **No time extensions**
  - Less-intensive verification this year with option for no site visit if:
    - Positive verification statement last year and did not change verification body
  - Site visit or webinar should be considered to expedite verification process, facilitate data sharing, and increase verifier confidence
- Begin verification process as soon as possible (e.g., contracting and scheduling). Do not wait until reporting is completed
- Verifiers must submit an adverse statement if verification not completed on time
- Failure to have a verification statement submitted by the verification deadline is a violation of the regulation for each day the verification statement is late

# Enforcement Summary

- ▣ Issues that could lead to enforcement include:
  - ▣ Incorrect data submitted
  - ▣ Errors leading to a material misstatement (includes errors present at the reporting or the verification deadline)
  - ▣ Failure to fix correctable errors
  - ▣ Late reports or failure to report
  - ▣ Late verification or no verification
- ▣ ARB has completed enforcement actions related to reporting, and continues enforcement activities
- ▣ As completed, case settlements are posted here:  
<http://www.arb.ca.gov/enf/casesett/casesett.htm>

# Regulation Updates

## ▣ Mandatory Reporting Regulation

- ▣ No 2016 MRR updates
- ▣ No new provisions take effect for 2016 data
- ▣ Current regulation,  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2014-unofficial-02042015.pdf>

## ▣ Cap-and-Trade Regulation

- ▣ For EPEs, no changes to Covered Emissions calculations
- ▣ Current regulation,  
[http://www.arb.ca.gov/cc/capandtrade/capandtrade/unofficial\\_ct\\_030116.pdf](http://www.arb.ca.gov/cc/capandtrade/capandtrade/unofficial_ct_030116.pdf)



# General Reporting and Verification Information

# Cal e-GGRT Tool Availability

- Tool available NOW
  - 2016 data reporting activated
- Electric Power Entity module has been activated



# Reporting Tips

- ▣ Start early, finish early
- ▣ Involve verifier as soon as possible
  - ▣ Include enough time to revise data based on verification
  - ▣ Some reporters are reaching the 6-year time limit with the same verification body and must hire a new verifier. Contact ARB if unsure.
    - ▣ New verification body = site visit required
  - ▣ Reminder: Complete and accurate data must be submitted by the reporting deadline
- ▣ Update DR, ADR, Agents as needed
  - ▣ Old employees, etc., have access to system until you remove them
- ▣ Contact ARB for any questions about requirements ([ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov))
  - ▣ Save and file any ARB responses as part of your GHG Inventory Program
- ▣ Check ARB guidance related to EPEs:  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-power/ghg-rep-power.htm>

# Verification Tips for Reporters

- ▣ Correctable errors must be fixed
  - ▣ If not, verifier must submit adverse statement
- ▣ “Covered emissions” data must meet accuracy requirements and be reasonably assured of no material misstatement
- ▣ If verifier and reporter disagree on requirements, always contact ARB for assistance
- ▣ Ensure GHG inventory program meets the requirements of section 95105(d) and includes helpful information
  - ▣ Robust description of key personnel and procedures
  - ▣ Provide copy to verifier as soon as possible
- ▣ Provide all ARB written clarifications for reporting to verifier

# Verification Process Timing

- ▣ Reporters can improve process by:
  - ▣ Ensuring contracting is in place and COI is submitted to ARB prior to report submission
  - ▣ Providing data to verifiers ASAP after report submission
  - ▣ Scheduling site visit, or remote desktop (webinar) review in June
- ▣ Ask questions of ARB early to ensure sufficient time to address issues
- ▣ Reporters and verifiers should work together to facilitate earlier site visits and submission of verification statements

# Guidance Document Updates

- Electric Power Entity (EPE) Frequently Asked Questions (FAQ)
  - Minor changes to the EPE FAQ document to respond to questions regarding specified source and REC serial number reporting
- EPE guidance documents available here:  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-power/ghg-rep-power.htm>

# Cal e-GGRT and Workbook Updates & Review

# Preliminary Emission Factor List

- ARB provided draft specified source emission factors based on February 1 Specified Source Registration workbooks
  - Allows EPEs to ensure all of their sources are included in the workbooks and the emission factors are reasonable based on publicly available data
  - Staff found this very helpful to ensure the workbook is complete before posting and it was well received by EPEs
  - Release planned again for next year



# Updates to Tool and Workbook

- Time Stamp for File Uploads in Cal e-GGRT

File Name	Uploaded By	Uploaded Date
Test File.xlsx	Wade McCartney	March 1, 2017 6:02:46 PM

- Removed GPE field from the Reporter Info tab

- Field was obsolete given last year's revisions to GPE fields in the Spec Info tab in Columns AR to AU

- Exports Transmission Loss Factor always TLF =1.0

- In Cal e-GGRT HTML Report and in Workbook 1

- Minor field label updates, where an EF component should have been just CO<sub>2</sub>, not CO<sub>2</sub>e

# Questions

# Resources

- ▣ Email reporting questions to: [ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov)
- ▣ Reporting Guidance for EPEs  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-power/ghg-rep-power.htm>
- ▣ Cal e-GGRT Tool Training  
<http://www.arb.ca.gov/cc/reporting/ghg-rep/tool/ghg-tool.htm>
- ▣ Cal e-GGRT Main Help Page  
<http://www.ccdsupport.com/confluence/display/calhelp/Home>
- ▣ Accredited Verification Bodies  
<https://www.arb.ca.gov/cc/reporting/ghg-ver/ghg-ver.htm>

# Key Reporting Dates

Date	Activity
<b>March 9</b>	Public release of Cal e-GGRT module for EPEs
<b>June 1</b>	Regulatory deadline: Reporting deadline for electric power entities and those subject to abbreviated reporting
<b>September 1</b>	Regulatory deadline: Verification statements due (emissions data and product data)

# GHG Reporting Contacts

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