

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

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)
 - 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 CO₂, not CO₂e

Questions

Resources

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

GHG Reporting Contacts

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