



## Regulation for the Mandatory Reporting of Greenhouse Gas Emissions GHG Reporting For 2017 Data Electric Power Entities



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March 6, 2018

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



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## Overview



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## 2016 Data Reporting Recap

- 800 reports submitted
- 515 verified, 170 site visits
  - 100% received positive or qualified positive emissions verification statements
  - Other reports not subject to verification (abbreviated or retail provider with no imports/exports)
- 2016 summary data posted for all reports
  - <https://ww2.arb.ca.gov/mrr-data>



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## Reporting Schedule

- June 1, 2018
  - 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:  
<https://ww2.arb.ca.gov/mrr-key-dates>



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## Verification Schedule

- Must be completed by **August 10, 2018**
  - No time extensions
  - Less-intensive verification this year with the option for no site visit if the EPE
    - Received a positive verification statement last year and
    - Did not change verification bodies
  - Site visits or webinars should be considered to expedite the verification process, facilitate data sharing, and increase verifier confidence
- Begin the 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 the verification is 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



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## 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
- CARB 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>



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## Regulation Updates

- Mandatory Reporting Regulation (MRR)
  - 2016 Update
    - Only §95111(h) EIM provisions effective for 2017 data reporting
    - All other EPE provisions effective next cycle for 2018 data reporting
    - 2016 MRR, <https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2016-unofficial-2017-10-10.pdf>
  - Current 2014 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 effective October 1, 2017, [https://www.arb.ca.gov/cc/capandtrade/capandtrade/unofficial\\_ct\\_100217.pdf](https://www.arb.ca.gov/cc/capandtrade/capandtrade/unofficial_ct_100217.pdf)
  - Qualified Export (QE) Adjustment removed but can still be reported under MRR with 2017 data
    - QE Adjustment not allowed for 2018 data reported in 2019 and future years



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# General Reporting and Verification Information



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## Cal e-GGRT Tool Availability

- ❑ Tool available NOW
  - ❑ 2017 data reporting activated
  - ❑ Workbooks 1-4 have been posted:  
<https://www.ccdsupport.com/confluence/display/calhelp/Reporting+Form+Instructions>
- ❑ Electric Power Entity module has been activated



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



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## 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 CARB 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 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 Inventory Program
- ❑ Check CARB guidance related to EPEs:  
<https://ww2.arb.ca.gov/mrr-epe>



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## Verification Tips for Reporters

- ❑ Correctable errors (errors that affect reported emissions) must be fixed
  - ❑ If not, the verifier must submit an adverse statement
- ❑ "Covered emissions" data must meet accuracy requirements and be reasonably assured of no material misstatement
- ❑ If the verifier and reporter disagree on requirements, always contact CARB for assistance
- ❑ Ensure the 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 CARB written clarifications for reporting to verifier



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## Verification Process Timing

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



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## Guidance Document Updates



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## Updates to Guidance

- Guidance still based on 2014 MRR
  - Guidance updates for 2016 MRR planned for next year
  - Posted here, <https://ww2.arb.ca.gov/mrr-epe>
- EPE FAQ – Updates include:
  - Added a Table of Contents with active links
  - New FAQs: EIM (#6); Reporting Retail Sales (#7); Cessation (#8), next slides
  - Clarified CAISO Sales Threshold questions #2 and #4
  - Clarifications on CEC RPS Eligibility for CARB reporting
  - Added text on 2014 vs. 2016 MRR applicability
  - FAQ 1.4.3. updated with Tacoma Power as the third ACS entity
- RPS Adjustment Guidance document
  - Minor formatting changes; minor changes to echo workbook format and language



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## New EPE FAQs on CAISO EIM

- To briefly explain EIM reporting
- FAQs #6 - Questions
  - 6.1 Are EPEs required to report EIM imports and exports under MRR?
  - 6.2 What CAISO settlement data should be used when reporting EIM imports?



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## New FAQs on Reporting Retail Sales of Electricity

- Provides direction on how to report retail sales that serve California's load
- FAQs #7 - Questions
  - 7.1 Do EPEs have to report retail sales that serve California load?
  - 7.2 How should CPUC-registered electric service providers (ESP) report?
  - 7.3 Can an EPE report retail sales for an affiliated ESP or community choice aggregator (CCA)?
  - 7.4 How should an EPE document the practice of reporting retail sales for an affiliated ESP or a CCA?



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## New FAQs on Cessation

- Reflects 2014 MRR and future year 2016 MRR
- FAQs #8 - Questions
  - 8.1 Imports and/or Exports: When an EPE stops importing and exporting power, how much longer does the EPE have to report and verify?
    - Data Year 2017. An EPE with zero imports and/or exports reports this year and next, and must undergo verification this year
  - 8.2 Wheels: When an EPE only has "wheeled electricity through California" to report, does the EPE have to report and verify?
    - An EPE with only reportable wheels is not considered an importer or exporter and is not required to report or verify



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## CAISO Sales Threshold Questions

- Clarified CAISO Sales Threshold questions #2 and #4

### Redline version:

#### ALLOWANCES ALLOCATED TO COMPLIANCE ACCOUNT

2. Did you direct ARB to deposit ~~have~~ any allocated allowances ~~intedeposited~~ in your compliance account ~~of the, or in another electric power entity's (EPE) compliance account of an electrical generating facility??~~ If answering "No," you are not required to report CAISO sales and no additional information is required on this sheet.

#### COMPLIANCE OBLIGATION

4. ~~Do you have, or did you direct ARB an EPE to deposit whom you~~ allocated allowances ~~into the compliance account of an electrical generating facility that has allowances to, have~~ a compliance obligation under the Cap-and-Trade Regulation for emissions from electricity sold into CAISO? (Yes/No) \_\_\_

### Clean version:

2. Did you have any allocated allowances deposited in your compliance account, or in another electric power entity's (EPE) compliance account? If answering "No," you are not required to report CAISO sales and no additional information is required on this sheet.

4. Do you, or an EPE to whom you allocated allowances to, have a compliance obligation under the Cap-and-Trade Regulation for emissions from electricity sold into CAISO? (Yes/No)



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## CARB Advisory Info on CEC RPS Eligibility

- California Energy Commission (CEC) certifies electric generation facilities as "RPS-eligible" under the California RPS Program
  - List of eligible and ineligible facilities at <http://rps.energy.ca.gov>
- When reporting under CARB MRR
  - RPS Adjustments are only allowed for power from eligible facilities
  - EPEs importing power from eligible facilities are required to report RECs
- CARB advisory by facility in the workbooks determined by:
  - Certification Status: Approved, and
  - Certification Type: Not Pre-Certification, and
  - Eligibility Date before or during reporting year.
  - Result: Either "Ineligible", "Eligible", or "Partial Year Eligibility"



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# Cal e-GGRT and Workbook Updates



## Preliminary Emission Factor List

- CARB provided draft specified source emission factors based on February 1 Specified Source Registration workbooks
  - Allows EPEs to ensure all of their registered sources are included in the workbooks and the emission factors are reasonable based on publicly available data
  - Staff found that providing Preliminary EFs is very helpful to ensure workbooks are complete before posting
- Based on your feedback, CARB plans to release draft EFs again next year



## Workbook 1 – Reporter Info tab

- “EPE Type” replaces “Supplemental Data Category” field, and new field values
- “Retail Provider in California (Y/N)” new field
- New text in “Notes” field on reporting retail sales for additional entity

	A	E	C
1	<b>ELECTRIC POWER ENTITY SUBMISSION INFORMATION</b>		
2			
3	Entity Name (Required)	Sacramento Municipal Utility District (SMUD) - Electric Power Entity	
4	If not listed above, enter Entity Name		
5	ARB Electric Power Entity ID# (Required)	3058	
6	EPE Type per CARB	POU	
7	Confirm EPE Type (Required)	POU - Publicly Owned Utility serving load in CA	Match
8	Retail Provider in California? (Y/N) (Required)	Yes	
9	Emission Year (Required)	2017	
10	Submission Date (Required)	05-15-2018	
11	Balancing Authority Area in which Retail Customers are Located	BANC	
12	California Retail Sales, MWh		123,456
13	MJRP Total Service Territory Retail Sales, MWh		
14	Electrification (subset of retail sales), MWh		
15	Notes: If reporting retail sales for another entity, provide the entity name, ID number, and MWh value.		



## Workbook 1 – CAISO Sales tab

- Threshold Question #1 (POU or CO-OP) in Cell A8 is now autofilled from user input on the Reporter Info tab, as shown in Cell A9
- Revised wording to clarify Threshold Questions #2 and #4
- XML Validation of Cell F8 is based on inputs in Cells A8:E8 that will prevent XML upload to Cal e-GGRT if threshold questions are incomplete

	A	B	C	D	E	F
7	<b>1 - POU or CO-OP</b> Are you a POU or Co-op? (Yes/No) if answering "No," you are not required to report CAISO sales and no additional information is required on this tab.  Note: The two auto-populated fields below are from the "Reporter Info" tab.	<b>2 - ALLOWANCES ALLOCATED TO COMPLIANCE ACCOUNT</b> Did you have any allocated allowances deposited in your compliance account, or in another electric power entity's (EPE) compliance account? If answering "No," you are not required to report CAISO sales and no additional information is required on this sheet.	<b>3 - CAISO SALES</b> Did you sell any power into any CAISO markets during the last calendar year? (Yes/No)	<b>4 - COMPLIANCE OBLIGATION</b> Do you, or an EPE to whom you allocated allowances to, have a compliance obligation under the Cap-and-Trade Regulation for emissions from electricity sold into CAISO? (Yes/No)	<b>5 - EXCESS ELECTRICITY SOLD INTO CAISO FOR NON-NATIVE LOAD</b> Was any electricity from any resource in your portfolio sold into CAISO markets that ultimately served any non-native load? (Yes/No)	Are you required to report electricity sales into CAISO pursuant to section 95111(a)(12)?  If "Yes", report detailed CAISO Sales Information below.
8	Yes	Yes	Yes	Yes	Yes	Yes
9	POU - Publicly Owned Utility serving load in CA	Note: Allocated Allowances are deposited by CARB into the Limited Use Holding Account (LUHA) of each eligible entity. Only Entities can move allowances from their LUHA to their Compliance Accounts. Thus, if all allocated allowances remain in the LUHA, the answer to Question #2 is "No."				New XML Validation



## Workbook 1 – Unspecified Imports

- Deleted the following four fields: First Point of Receipt, Transaction Start Date, Transaction End Date, & NERC e-Tag Code
- Three optional fields removed and one redundant item to streamline reporting
- Same four fields also deleted in Spec Imports, RPS Adjust, Unspec Exports, and Spec Exports tabs

	A	B	C	D	E
12	Aggregated by First Point of Receipt (POR) on NERC e-tag at, or near, the Source per 95111(a)(3) [Input First POR Code]	First Point of Receipt (POR) Full Name	Transaction Start Date (Required if reporting by e-tag transaction) [Optional]	Transaction End Date (Required if reporting by e-tag transaction) [Optional]	NERC e-tag Code (Required if reporting by e-tag transaction) [Optional]
13					
15					
16	Rows inserted below this message will not be saved in the XML upload				
17		DELETE FIELD	DELETE FIELD	DELETE FIELD	DELETE FIELD
18		First Point of Receipt (POR) Full Name	Transaction Start Date (Required if reporting by e-tag transaction) [Optional]	Transaction End Date (Required if reporting by e-tag transaction) [Optional]	NERC e-tag Code (Required if reporting by e-tag transaction) [Optional]
19					



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## Workbook 1 – Specified Imports tab

(1 of 2)

- New **CEC RPS ID** field in Column D pulls ID from new "CEC RPS List" tab
- Jurisdiction** field in Column J (state) is now autofilled when a resource is selected in Column A
- In Manual EF field set: New "**CARB Authorization**" field in Column R where EPEs must demonstrate approval received to use a Manual Emissions Factor
- In **Retail Providers Only** field set: New autofilled "Are you a Retail Provider?" response pulled in from Reporter Info tab in Column AP. Reworded fieldname in Column AQ to read, "Was the Power Brought in on Your Behalf?"
- New **Retail Provider** fields in Columns AZ-BB
  - All three fields are autofill based on earlier responses and info
    - Are you a retail provider in CA and a GPE?
    - Low or High GHG relative to 0.428 MT CO<sub>2</sub>e/MWh
    - Flag (Yes/No) to report line item in the Retail Provider tab

Retail Provider Tab Reporting Applicability		
GPE & High GHG Threshold per Section 95111(e)(3)		
Are you a Retail Provider in California (GPE)? a Certification Threshold? (GPE)?	Are you a Retail Provider in California (GPE)? a Certification Threshold? (GPE)?	Are you a Retail Provider in California (GPE)? a Certification Threshold? (GPE)?
Yes	High GHG	Yes
No	Low GHG	No
Yes	High GHG	Yes
Yes	Low GHG	No



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## Workbook 1 – Specified Imports tab

(2 of 2)

- CEC RPS Eligibility Advisory Info** field -- New in Column BD
  - CARB Interpretation of CEC Renewables Portfolio Standard (RPS) Eligibility in California
  - Based on CEC RPS Eligible List at <http://rps.energy.ca.gov>
  - See reference list in "CEC RPS List" tab in Workbook 1 updated 1/5/2018
  - CARB advisory is based on the following three criteria
    - Certification Status: "Approved"
    - Certification Type: Not "Pre-Certification"
    - Eligibility Date
  - Results in either "Ineligible", "Eligible", or "Partial Year Eligibility"
- The EPE response in Column BE still reports eligibility in column BE based on their own information
  - For the reason that the CEC RPS Eligible List:
    - Could have been updated
    - Will be updated
    - Subject to use of Retroactive REC's
  - If mismatch between BD and BE, verifier should review eligibility and ask for additional justification. Note BD is only advisory and user input in BE controls reported data.

BD	BE
CEC RPS ELIGIBILITY ADVISORY INFO See CEC RPS Eligible List at <a href="http://rps.energy.ca.gov">http://rps.energy.ca.gov</a>	Is the power from an Eligible Renewable Energy Resource, per Section 35802(a) (Y/N)
Not Eligible	No
Eligible	Yes
Not Eligible	Yes
Eligible	Yes



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## Workbook 1 – RPS Adjust tab

- Jurisdiction** field will now autofill, and three **Optional** fields have been deleted as previously described
- CEC RPS Eligibility Advisory Info** field (see previous slide) - New in Column N
  - RPS Adjustments are only allowed for power from eligible facilities
  - Imports from eligible facilities are required to report RECs
- REC Date** retired filed in Column P now uses MM/DD/YYYY date format
- New **REC Vintage** field in Column T with YYYY date format
- New **CEC RPS ID** field in Column D pulls ID from "CEC RPS List" tab
  - Located in Tabs:
    - Spec Imports
    - RPS Adjust
    - REC Serial
    - CEC RPS List

A	B	C	D
Facility and Unit ID Name (select "Other" if not listed)  For the drop down list, see the hover note in the cell below.	ARB Facility and Unit ID#	If facility is un-listed, Facility Name	CEC RPS ID
Big Horn II-Wind	800180		61201
Arlington Valley Solar Project	700100		60864



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## Workbook 1 – REC Serial tab

- ❑ New field: **“Where Did You Obtain The RECs”** in Column K
  - ❑ Drop-down field values: WREGIS, GPE, Other EPE, Not Listed
- ❑ New field: **“On-Behalf Of Imports (Y/N)”** in Column L
  - ❑ Answer should always be “No” because RECs should not be reported for On-Behalf of spec imports, and imported power is not eligible for RPS Adjustment
- ❑ **REC Vintage** field in Column Q now only with YYYY date format
- ❑ Updated tabulation logic for the RPS Adjustment RECs
  - ❑ Select “RPS Adjustment” in Column I, and
  - ❑ REC Status in Column J must be Retired, in order for REC quantity to tabulate as RPS adjustment in Column F
  - ❑ Automates data quality check

E	F	G	H	I	J
Total RECs	Eligible RPS Adjustment RECs per Section 95111(g)(1)(D)(i) RECs must be Retired to Count	Previously Reported But Subsequently Withdrawn RECs Used For A Prior RPS Adjustment per Section 95111(g)(1)(D)(k)(2)	Specified Source RECs per Section 95111(g)(1)(D)(k)(3)	MWh Tabulation for Each Line Item	REC Status for Each Line Item
300.00	300.00	0.00	0.00	RPS Adjustment	Retired
0.00	0.00	0.00	0.00	RPS Adjustment	Active



## Workbook 1 – Wheeled tab

- ❑ Deleted the three Optional fields shown below
  - ❑ Same fields also deleted in Spec Imports, RPS Adjust, Unspec Exports, and Spec Exports tabs
- ❑ Deleted First Point of Receipt (POR) Full Name field in Column Q
- ❑ Deleted Final Point of Delivery (POD) Full Name field in Column U

D	E	F	Q	U
Transaction Start Date (Required if reporting by e-tag transaction) [Optional]	Transaction End Date (Required if reporting by e-tag transaction) [Optional]	NERC e-tag Code (Required if reporting by e-tag transaction) [Optional]	First Point of Receipt (POR) Full Name	Final Point of Delivery (POD) Full Name



## REC Tabulation in GHG Summary Report

- ❑ New: REC Tabulation in Cal e-GGRT GHG Summary Report

Generation Resource by Claim Type	Reported MWH	Required RECS	(Under)/Over
<b>RPS Adjustment RECs - Detail</b>			
Arlington Wind Power Project, ARB ID. 800016	50,000	75,000	25,000
Big Horn II-Wind, ARB ID. 800180	45,000	47,000	2,000
Biglow Canyon Wind Farm (Phase 1), ARB ID. 800007	30,000	30,000	-
Biglow Canyon Wind Farm (Phase 2), ARB ID. 810004	25,000	23,000	(2,000)
Biglow Canyon Wind Farm (Phase 3), ARB ID. 810003	10,000	10,000	-
<b>RPS Adjustment RECs - Total</b>	<b>160,000</b>	<b>185,000</b>	<b>25,000</b>
<b>Specified Sources Imports RECs - Detail</b>			
Arlington Valley Solar Project, ARB ID. 700100	25,000	23,000	(2,000)
Copper Mountain Solar 2 (CMS2), ARB ID. 700004	30,000	30,000	-
Copper Mountain Solar 3, ARB ID. 700101	35,000	38,000	3,000
Copper Mountain Solar 4 (CMS4), ARB ID. 700130	45,000	47,000	2,000
Macho Springs Solar Facility, ARB ID. 700124	85,000	80,000	(5,000)
<b>Specified Sources Imports RECs - Total</b>	<b>220,000</b>	<b>218,000</b>	<b>(2,000)</b>



## Additional Verifier Information

- ❑ Verifiers are expected to resolve all validation errors identified in the worksheets and Cal e-GGRT report with their reporters
  - ❑ All issues must first be logged in the issues log when reviewing the initial submitted report
- ❑ If there are any issues regarding discrepancies in CEC Eligibility status as advised by CARB and as reported by the reporter, please contact CARB immediately so that we can participate in the resolution and, if applicable, update our records accordingly
- ❑ Verifiers and reporters can still expect communications from CARB via Cal e-GGRT after June 1 regarding at least the following quality assurance checks, if any:
  - ❑ Over-allocation of resources
  - ❑ Overlap of reported REC serials
  - ❑ Discrepancies identified by CARB during quality assurance checks





# Questions



# Resources

- ▣ Email reporting questions to: [ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov)
- ▣ Reporting Guidance for EPEs  
<https://ww2.arb.ca.gov/mrr-epe>
- ▣ 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://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/verification-bodies>



# Key Reporting Dates

Date	Activity
February 20	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
July 16	Deadline for corrections to RPS Adjustment data required for electric power entity data reports (i.e., 45 days following the emissions data report due date)
August 10	<b>NEW</b> Regulatory deadline: Verification statements due

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



# GHG Reporting Contacts

Subject Matter	Contact
Manager – Climate Change Reporting Section	Syd Partridge, Manager 916.445.4292
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	<a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a>
Reporting Tool Registration and General Questions	<a href="mailto:Karen.Lutter@arb.ca.gov">Karen Lutter</a> 916.322.8620
Electricity Retail Providers and Electricity Marketers, §95111	<a href="mailto:Wade.McCartney@arb.ca.gov">Wade McCartney</a> 916.327.0822
Manager – Greenhouse Gas Verification Section	<a href="mailto:Ryan.Schauland@arb.ca.gov">Ryan Schauland</a> , Manager 916.324.1847
Verification of Electricity Retail Providers and Electricity Marketers	<a href="mailto:Abajh.Singh@arb.ca.gov">Abajh Singh</a> 916.322.8276
Chief – Program Planning and Monitoring Branch	<a href="mailto:Brieanne.Aguila@arb.ca.gov">Brieanne Aguila</a> , Chief 916.324.0919

