



GHG Reporting Kickoff for 2017 Data Regulation for the Mandatory Reporting of Greenhouse Gas Emissions Jan

 CALIFORNIA AIR RESOURCES BOARD


Slides available here:
<https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training>

Outline

- ▣ Overview
- ▣ General Reporting and Verification Information
- ▣ Summary of Revisions to MRR
- ▣ Cal e-GGRT Reporting Tool Updates
- ▣ Updates to Guidance Documents
- ▣ Questions

This webinar focuses on facility and fuel supplier reporting

A separate webinar will be held for Electric Power Entities in February 2018




2016 Data Reporting Recap

- ▣ 800 reports submitted
- ▣ 515 verified
 - ▣ 100% received positive or qualified positive emissions verification statements (no adverse)
 - ▣ Other reports not subject to verification (i.e., abbreviated reporters or retail providers with no imports/exports)
- ▣ 2016 summary data posted for all reports here:
 - ▣ <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/data>




Reporting Schedule

- ▣ April 10, 2018
 - ▣ Reports due for facilities and suppliers
 - ▣ Cal e-GGRT is live, so reports can be generated at any time
- ▣ June 1, 2018
 - ▣ Reports due for EPEs and electricity retail providers
 - ▣ Reports due for abbreviated reporters (suppliers do not qualify for abbreviated reporting)
- ▣ Failure to submit a report by the required deadline is a violation of the regulation for each day the report is late
 - ▣ No time extensions
- ▣ Key Dates Reference Page:
 - ▣ <https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/dates>




Verification Schedule

- **Starting with 2017 data reported this year, the verification deadline is now August 10**
 - Verification statements due for all emissions and product data
 - No time extensions
- Begin contracting and submit COI as soon as possible; do not wait until reporting is completed
- Verifiers must submit an adverse statement if verification is not completed on time
- Failure to have a verification statement(s) 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
 - Incorrect data submitted
 - Errors leading to a material misstatement (includes errors present at the reporting or the verification deadlines)
 - Failure to fix correctable errors
 - Late reports or failure to report
 - Late verification or no verification
- CARB has completed enforcement actions related to reporting
- As completed, case settlements are posted here: <https://www.arb.ca.gov/enf/casesett/casesett.htm>




General Reporting and Verification Information



Cal e-GGRT Tool Availability



- Tool available NOW and activated for 2017 data reporting
 - **Begin early to accommodate new verification deadline of August 10**
- Cal e-GGRT release automatically migrates 2016 data to 2017 reports
- Electric Power Entity module will be activated in early March



Reporting Tips

- Begin now! – Compile and enter your data
 - Shorter verification timeframe, so begin the process as soon as possible
- Update DR, ADR, Agents as needed
 - Old employees, etc., have access to system until you remove them
- Involve verifier as soon as possible
 - Allow time to revise data based on verification
 - If at the 6-year time limit with the same verification body, must hire a new verifier
 - Complete and accurate data must be submitted by the reporting deadline
- Contact CARB for any questions about requirements (ghgreport@arb.ca.gov)
 - Save and file any CARB responses as part of your GHG Monitoring Plan
- Check CARB guidance: <http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.htm>



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Verification Tips for Reporters

- Correctable errors must be fixed
 - If not, verifier must submit adverse statement
- “Covered emissions” and “covered product data” must meet accuracy requirements and be reasonably assured of no material misstatement
- Provide verifiers with documentation and approval letters related to CARB approved meter postponement or change of method requests
- If verifier and reporter disagree on requirements, always contact CARB for assistance
- Ensure GHG monitoring plan meets the requirements of section 95105(c) and includes any additional helpful information for your verifier
 - Robust GHG monitoring plans facilitate verification
 - Include all CARB written clarifications regarding reporting in the GHG monitoring plan



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Verification Process Timing (1)

- Continued progress on earlier submissions of Conflict of Interest (COI) self-evaluations
 - Submit as soon as possible: COI can be submitted prior to report submission
- Schedule site visits early to address issues more quickly
 - Conducting site visits in late July and August should be avoided
- Option for less-intensive verification (including no site visit) for many reporters. However, site visit is always an option.
 - Consider holding a webinar if no site visit
- Plan ahead to address verifier questions, such as meter accuracy and metering questions, to avoid last minute regulation interpretations by CARB



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Verification Process Timing (2)


- Reporters can streamline verification by:
 - Ensuring executed verifier contract and COI submittal to CARB prior to report submission
 - Providing data to verifiers ASAP after report submission
 - Scheduling site visits as early as March, April and May for suppliers and facility operators, and June for EPEs
 - Schedule webinars and phone calls to ensure important issues are discussed early
 - Being responsive to verifier requests for revisions
- Reporters and verifiers should work together to facilitate earlier submission of verification statements



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Reporting of Natural Gas Received

- Ensure the following information is correctly reported per MRR and CARB guidance:
 - Facility natural gas purchase/acquisition data pursuant to 95115(k):
 - Report the natural gas supplier (e.g. the utility or pipeline operator that physically delivers gas to your facility). This is often not the company the gas is purchased from (marketer)
 - Check the "interstate pipeline" option if gas is received from a direct connection to an interstate pipeline
 - Note: New question in Cal e-GGRT asking for permissions to share NG data with the facility's natural gas supplier. This would help facilitate an accurate and timely covered emissions calculation by CARB




Cessation of Reporting and Verification

- Reporting entities must notify CARB if they are no longer subject to reporting
 - Notify by March 31 of the year following shutdown or following the third consecutive year of emissions less than 10,000 MT CO₂e
- Reporting entities must notify CARB if they are no longer subject to verification per requirements in section 95101(i)
 - Notify by the applicable reporting deadline
 - Information is also provided to Cap-and-Trade Program to assist in program implementation
 - Verification is always required if subject to Cap-and-Trade Regulation
- Review revised section 95101(h) in MRR for additional clarifications




Summary of Revisions to MRR




MRR Changes Effective for 2017 Data

Change	MRR Section(s)	Cal e-GGRT Subparts	Summary of Change
Verification Deadline	95103(f), 95103(h)(1)	All	Verification deadline changed to August 10 .
Covered Product Data	95102(b), 95114(j), 95115(n), 95119(d)	Subpart A, P	Product data modifications: <ul style="list-style-type: none"> • Soda ash • Dairy • Almond/pistachio • Sulfuric acid regeneration • Borate manufacturing • Pulp and paper manufacturing • Hydrogen
Covered Product Data	95115(n)	Subpart A	New product data: <ul style="list-style-type: none"> • Sulfuric acid production • Boric oxide equivalent production.
Complexity Weighted Barrel	95113(k)(3)	Subpart Y	Clarifications for refinery reporting of CWB data
Verification Services Requirements	95131	Verification	Updates to verification services requirements



Most Revisions Effective for 2018 Data

- Numerous revisions will become effective for 2018 data reported in 2019, among them:
 - Applicability changes requiring facilities to combine on-site fuel supplier emissions with combustion/vented/process emissions for threshold determination
 - "Facility" definition changes for onshore petroleum and natural gas production pertaining to natural gas processing equipment
 - Point of Regulation Change for imported LNG and LPG, from consignee to importer
 - Change in meter inspection frequency requirements for refineries and hydrogen producers, allowing 6 years between inspections
- See *Year of Applicability for 2016 MRR Revisions* guidance document on our guidance page (coming soon)

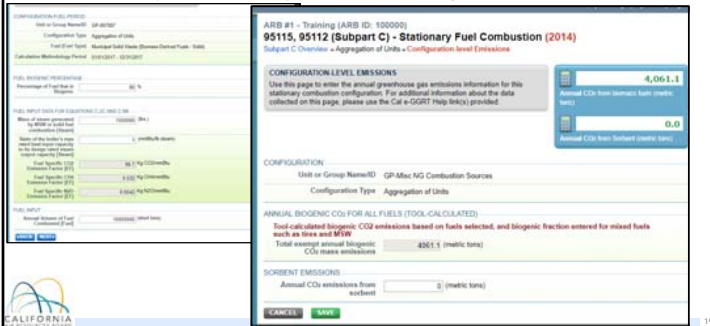


Cal e-GGRT Reporting Tool Updates



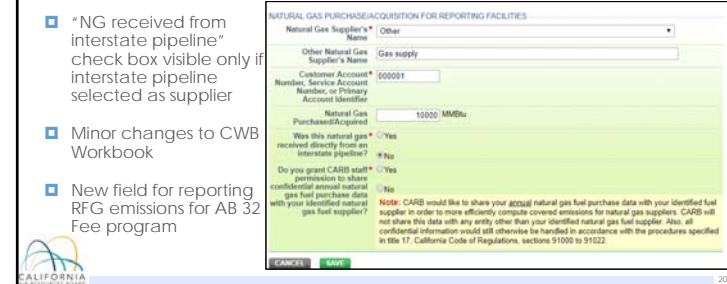
Biogenic Emissions Calculation

- Cal e-GGRT now automatically calculates biogenic emissions for Subpart C reporting
 - Previously, user manually entered total biogenic emissions




Additional Cal e-GGRT Updates

- Batch certification and submission of reports (for reporters with multiple facilities)
- Addition of question about sharing NG purchase data with NG supplier (confidential check box)
- "NG received from interstate pipeline" check box visible only if interstate pipeline selected as supplier
- Minor changes to CWB Workbook
- New field for reporting RFG emissions for AB 32 Fee program




Updates to Guidance Documents




Guidance Document Updates

- Emissions guidance updates include:
 - Clarifications for **hydrogen** facilities reporting refinery fuel gas under the AB 32 Fee Regulation and reporting hydrogen sales data
 - **Oil and Gas** emissions data guidance updated to reflect changes to the definition of gas processing plant facilities and other minor changes effective beginning with 2018 data reported in 2019
 - Minor clarifications for **measurement accuracy and missing data** based on reporter and verifier questions in 2017, and guidance for implementing new meter inspection frequency requirements at refineries beginning with 2018 data
 - Minor updates to **NGL fractionator and fuel supplier** guidance addressing changes effective beginning with 2018 data
- New applicability table providing the effective dates for new MRR provisions




Product Data Guidance Updates

- All covered product data changes effective for 2017 data
- General Covered Product Data Reporting and Verification Guidance:
 - New guidance for Soda Ash, Dairy, Almonds/Pistachios, Sulfuric Acid Regeneration, Boric Oxide Equivalent, Nitric Acid
- Refineries:
 - Guidance updated to reflect minor CWB reporting changes, calcined coke reporting, and sulfuric acid regeneration
- Oil and Gas:
 - Clarification of Thermally Enhanced Oil Recover (TEOR) and non-TEOR product data reporting and verification
- Tomato Processing:
 - Clarification and guidance on reporting changes for unpeeled and crushed whole tomatoes, tomato juice, and reprocessed tomatoes




Resources

- Email reporting questions to: ghgreport@arb.ca.gov
- Reporting Guidance
<http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.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
January 9	Public release of Cal e-GGRT for 2017 Data Reporting
April 10	Regulatory deadline: Reporting deadline for facilities, except when subject to abbreviated reporting, and suppliers of fuels and carbon dioxide
June 1	Regulatory deadline: Reporting deadline for electric power entities and those subject to abbreviated reporting
August 10	NEW Regulatory deadline: Verification statements due (emissions data and product data)



GHG Reporting Contacts

Subject Matter	Contact
Manager – Climate Change Reporting Section	Vacant
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Reporting Tool Registration and General Questions	Karen Lutter 916.322.8620
Electricity Retail Providers and Electricity Marketers	Wade McCartney 916.327.0822
Fuel and CO ₂ Suppliers - Transportation Fuels, Natural Gas, LPG, CO ₂	Syd Partridge 916.445.4292
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