

#### **GHG** Reporting Kickoff for 2019 Data

Regulation for the Mandatory Reporting of Greenhouse Gas Emissions January 27, 2020



#### Slides available here:

https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training

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#### Outline

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

This webinar focuses on facility and fuel supplier reporting.

A separate webinar will be held for Electric Power Entities in early March, 2020.



#### 2018 Data Reporting Recap

- 814 reports submitted
- 503 verified
  - 100% received positive / qualified positive emissions verification statements
- Other reports not subject to verification (i.e., abbreviated reporters or retail providers with no imports/exports)
- 2018 summary data posted for all reports here:
  - https://ww2.arb.ca.gov/mrr-data



# 2020 Key Reporting Dates



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

Date	Activity
April 10	Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting
June 1	Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting
August 10	Regulatory Deadline: Verification statements due (emissions data and product data)



### Reporting and Verification Schedule

- Verification statements due for all emissions and product data by Aug.10th 2020
- No extensions
- Failure to submit a report or verification by the required deadline is a violation of the regulation for each day the report or verification is late



#### Enforcement

- Issues that could lead to enforcement
  - Incorrect data reported
  - Failure to fix correctable errors that result in an adverse statement
  - Late reports or failure to report
  - Late verification or failure to verify
- CARB has completed enforcement actions related to reporting
  - Completed case settlements posted here: https://ww2.arb.ca.gov/our-work/programs/enforcement-policy-reports/enforcement-case-settlements



# General Reporting and Verification Information



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#### Reporting Tips

- Use 2018 MRR to report 2019 data: https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf
- Check CARB guidance materials for revised requirements: https://ww2.arb.ca.gov/mrr-guidance
- Utilize other resources available on the Mandatory Reporting website: <a href="https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting">https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting</a>
- If you think you may be eligible for cessation of reporting or verification [pursuant to section 95101(h)] or are ceasing operations [section 95101(i)], contact CARB staff before the report ing and verification deadlines so we can ensure regulatory requirements are appropriately met
- Contact CARB for any questions about requirements (<u>ahgreport@arb.ca.gov</u>)
  - Save and file any CARB responses as part of your GHG Monitoring Plan and provide to your verifier



#### Verification Essentials

- New verification body is required every six years
- Change of verification body automatically requires a site visit
- Be prepared to trace data to its origin, especially during site visit, or via webinar when site visit is not required
- Ensure GHG Monitoring Plan meets the requirements of section 95105(c) and includes any additional information that would be helpful to your verifier
- Correctable errors must be fixed. If not, verifier must submit an adverse statement.
- If verifier or reporter is unsure of requirements, please contact CARB for assistance
  - Retain written/emailed guidance from CARB staff for review by your verifier



#### Verification Best Practices

- Initiate verification as soon as possible to allow time for revisions
- Streamline verification:
  - Execute verifier contract prior to report certification
  - Associate your report with your verifier prior to report certification
  - Provide data to verifiers ASAP
  - Schedule site visit or webinar early
    - Be ready for questions early in the process from your verifier
  - Communicate promptly to ensure important issues are discussed early
- Start early and plan to finish early ensuring timely submittal



# Summary of Revisions to MRR



#### Revisions Effective for 2019 Data

■ Summarized in **Applicability for 2016 & 2018 MRR Revisions**:

https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/applicability-year.xlsx

Link also available online via MRR Guidance webpage: <a href="https://ww2.arb.ca.gov/mrr-guidance">https://ww2.arb.ca.gov/mrr-guidance</a>

#	Regulation Amendment	Regulation	Regulation Section	Affected Reporting Subpart(s)	Description of Regulatory Update	Data Month/Year * Revision is Applicable
1	Verificaton Services Requirements	2016 MRR	95131(b)(12) (E)	Verification	Verifiers must separately conduct a material misstatement evaluation for covered product data related to thermal enhanced oil recovery and covered product data related to non-thermal enhanced oil recovery.	2019
2	Continuous- Bleed Pneumatic Devices	2016 MRR	95153(a)	Subarticle 5 (95150-95158)	Emissions from continuous-bleed pneumatic devices must be measured.	2019
3	Continuous- Bleed Pneumatic Devices	2018 Cap-and- Trade	95852.2	Subarticle 5 (95150-95158)	Emissions from continuous-bleed pneumatic devices are now covered for onshore production and natural gas storage industry segments. Emissions from pneumatic devices at transmission compression facilities remain exempt from a compliance obligation.	2019

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#### Thermal vs non-thermal crude oil production

- Section 95131(b)(12)(E) requires verifiers to conduct a separate material misstatement evaluation on each crude oil type (Thermal enhanced oil recovery vs Non-thermal enhanced oil recovery)
  - Crude oil produced from both thermal enhanced and non-thermal enhanced oil recovery must be accurately disaggregated and separately reported
  - Only impacts a small number of oil producers that commingle both thermal and non-thermal within a storage facility
  - Please contact CARB if you have any questions regarding non metered well test data



#### Pneumatics for oil and gas facilities

Beginning with 2019 data, emissions from continuous-bleed pneumatic devices at onshore production and underground natural gas storage facilities are "covered"



- All emissions from pneumatics at transmission compression facilities remain exempt from a compliance obligation
- All continuous devices must be measured, or reported as de minimis

Industry Segment	Pneumatics Required to be Reported?	Are emissions from continuous low-bleed pneumatic devices Covered or Exempt for 2019+ data?
Offshore	No	-
Onshore	Yes	Covered
NG Processing	No	-
Transmission Compression	Yes	Exempt
Underground NG storage	Yes	Covered
LNG storage, import/export	No	-
NG Distribution	No	-



# Updates to Guidance Documents



## Guidance Updates

- Updated guidance documents available: https://ww2.arb.ca.gov/mrr-guidance
- Guidance documents updated to:
  - Provide new guidance for MRR amendments going into effect for 2019 data
  - Improve clarity of existing requirements



# Guidance Documents Revised for 2019 data

Guidance Documents	Scope of Revision
Applicability for 2016 and 2018 MRR Revisions (spreadsheet)	Revised to include 2018 MRR updates and changes to pneumatics covered emissions and reporting going into effect for 2019 data
Suppliers of Transportation Fuels and Natural Gas Fuels	Added description of how IOFs (Importers of Fuels) should report LPG in Cal e-GGRT
Petroleum and Natural Gas Systems	Updated discussion of pneumatic device emissions reporting and covered status in 3.14 to reflect regulatory changes

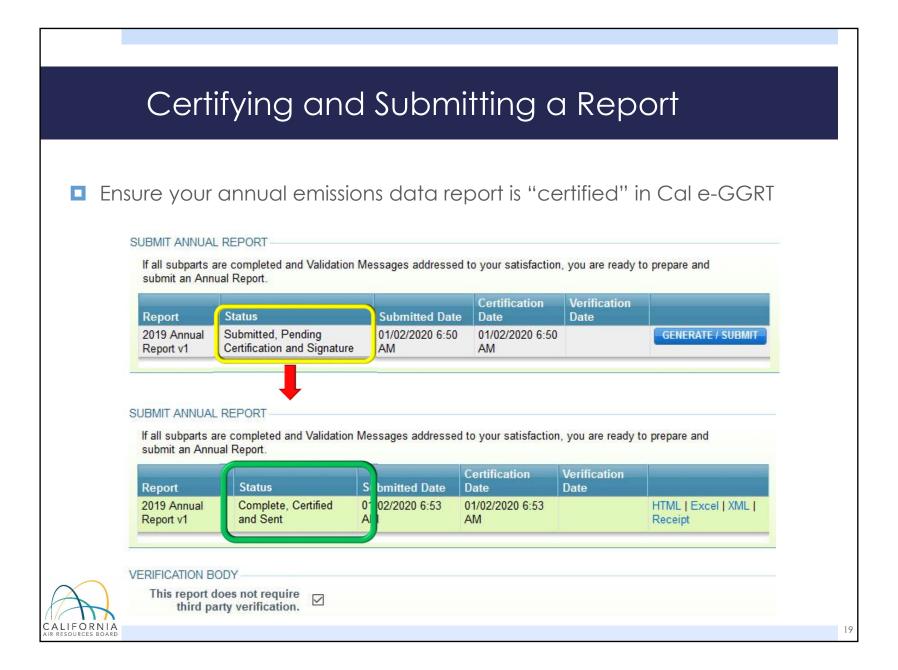


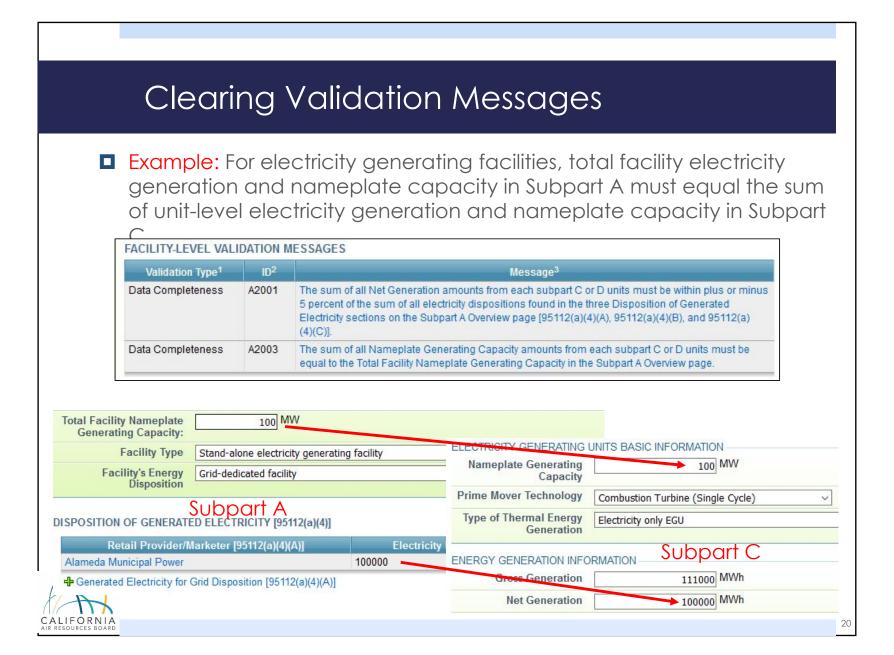
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#### Reminders

- Don't forget to submit and certify a generated report
- If your report won't generate:
  - Clear all validation messages
  - Clear a pending Certificate of Representation (COR)
  - Time-out issues: Try generating your report 3-4 times, then notify CARB
- Notify CARB promptly if DR (Designated Representative) left your company
  - It's the company's responsibility to notify CARB
  - We've had issues tracking down new personnel when the DR leaves
  - Late reporting violations do apply in such cases
- Notify CARB promptly if your facility is being sold or operational control is switching to a different operator
  - CARB will evaluate responsibility for reporting, verification, and C&T compliance
  - Can be complicated if transfer occurs during verification





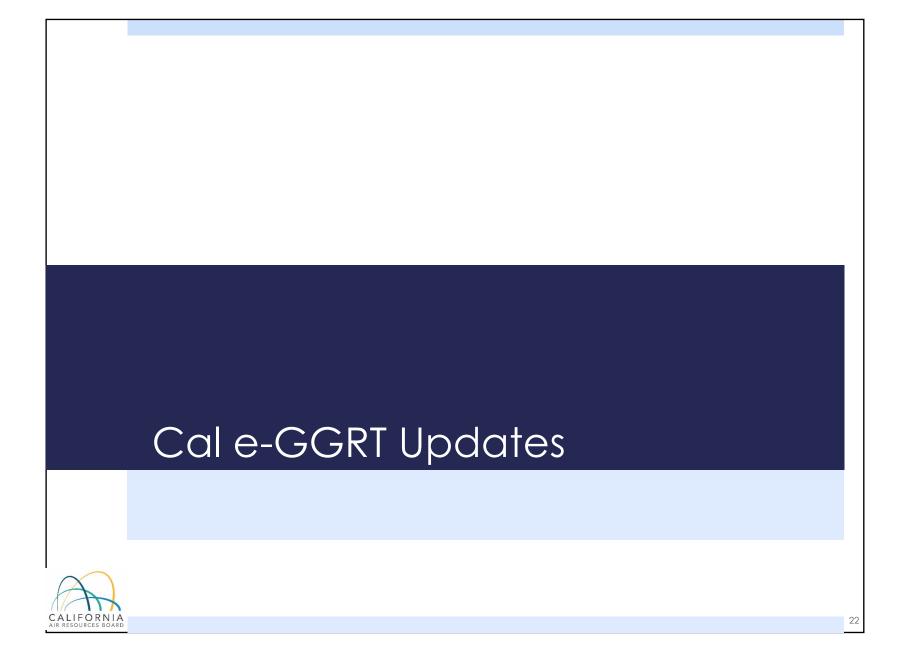


#### Clearing a Pending COR

- Certification of Representation (COR) is required to be signed when a new DR/ADR accepts their invitation
- An incomplete COR appears under Home tab of invitee's account
- Report can not be certified and submitted with a pending COR







#### Cal e-GGRT News & Reminders



https://ww2.arb.ca.gov/mrr-tool

- Tool will be available soon for 2019 data reporting
- Cal e-GGRT release automatically migrates 2018 data configuration to 2019 reports
- Update DR, ADR, Agents (Important!)
- Electric Power Entity Workbook 1 will be activated in early March



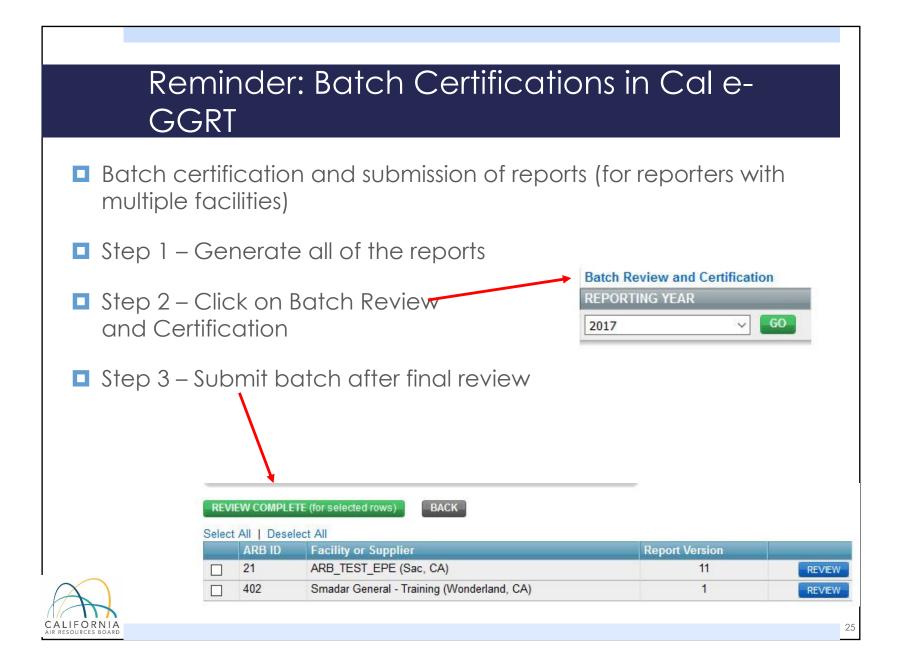
#### Reminder: Choosing a Verification Body

Entities can select a verification body prior to certifying report



- Verifiers submit conflict of interest forms electronically via Cal e-GGRT
  - Approvals from CARB typically take less than a week
  - New reporters must select a VB before verifier can submit COI





### The Take Home Message(s)

- Reach out to your verifier ASAP and select them in Cal e-GGRT
- Review changes going into effect for 2019 data:
  - Applicability for 2016 & 2018 MRR Revisions spreadsheet
  - Updated guidance docs
- Lots of resources available online
- Contact CARB for additional guidance (<u>https://ww2.arb.ca.gov/mrr-contacts</u>)



#### Resources

- Email reporting questions to: <a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a>
- Email verification questions to: <a href="mailto:ghgverify@arb.ca.gov">ghgverify@arb.ca.gov</a>
- Reporting Guidance <a href="https://ww2.arb.ca.gov/mrr-guidance">https://ww2.arb.ca.gov/mrr-guidance</a>
- Reporter Training Presentations
   https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training
- Cal e-GGRT Training https://ww2.arb.ca.gov/mrr-tool
- Cal e-GGRT Main Help Page
   <a href="http://www.ccdsupport.com/confluence/display/calhelp/Home">http://www.ccdsupport.com/confluence/display/calhelp/Home</a>
- Verification Bodies
  <a href="https://ww2.arb.ca.gov/verification-bodies">https://ww2.arb.ca.gov/verification-bodies</a>



# **GHG** Reporting Contacts

Program / Sector	Contact
Manager – Climate Change Reporting Section	Syd Partridge 916.445.4292
General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting	ghgreport@arb.ca.gov
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, and $CO_2$ )	Smadar Levy 916.324.0230
Petroleum Refineries, Hydrogen Plants, Oil & Gas Production, and Associated Product Data	DJay Patel 916.440.8256
Manager – Greenhouse Gas Verification Section	Ryan Schauland 916.324.1847
More contact information at: <a href="https://ww2.arb.ca.gov/mrr-contacts">https://ww2.arb.ca.gov/mrr-contacts</a>	



