



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>

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



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:
<https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting>
- 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 reporting and verification deadlines so we can ensure regulatory requirements are appropriately met
- Contact CARB for any questions about requirements (ghgreport@arb.ca.gov)
 - 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:
<https://ww2.arb.ca.gov/mrr-guidance>

#	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 faciilites remain exempt from a compliance obligation.	2019

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

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

Certifying and Submitting a Report

- Ensure your annual emissions data report is “certified” in Cal e-GGRT

SUBMIT ANNUAL REPORT

If all subparts are completed and Validation Messages addressed to your satisfaction, you are ready to prepare and submit an Annual Report.

Report	Status	Submitted Date	Certification Date	Verification Date	
2019 Annual Report v1	Submitted, Pending Certification and Signature	01/02/2020 6:50 AM	01/02/2020 6:50 AM		GENERATE / SUBMIT



SUBMIT ANNUAL REPORT

If all subparts are completed and Validation Messages addressed to your satisfaction, you are ready to prepare and submit an Annual Report.

Report	Status	Submitted Date	Certification Date	Verification Date	
2019 Annual Report v1	Complete, Certified and Sent	01/02/2020 6:53 AM	01/02/2020 6:53 AM		HTML Excel XML Receipt

VERIFICATION BODY

This report does not require third party verification.



Clearing Validation Messages

- Example:** For electricity generating facilities, total facility electricity generation and nameplate capacity in Subpart A must equal the sum of unit-level electricity generation and nameplate capacity in Subpart C

FACILITY-LEVEL VALIDATION MESSAGES		
Validation Type ¹	ID ²	Message ³
Data Completeness	A2001	The sum of all Net Generation amounts from each subpart C or D units must be within plus or minus 5 percent of the sum of all electricity dispositions found in the three Disposition of Generated Electricity sections on the Subpart A Overview page [95112(a)(4)(A), 95112(a)(4)(B), and 95112(a)(4)(C)].
Data Completeness	A2003	The sum of all Nameplate Generating Capacity amounts from each subpart C or D units must be equal to the Total Facility Nameplate Generating Capacity in the Subpart A Overview page.

Total Facility Nameplate Generating Capacity: MW

Facility Type: Stand-alone electricity generating facility

Facility's Energy Disposition: Grid-dedicated facility

DISPOSITION OF GENERATED ELECTRICITY [95112(a)(4)]

Retail Provider/Marketer [95112(a)(4)(A)]	Electricity
Alameda Municipal Power	100000

+ Generated Electricity for Grid Disposition [95112(a)(4)(A)]

ELECTRICITY GENERATING UNITS BASIC INFORMATION

Nameplate Generating Capacity: MW

Prime Mover Technology: Combustion Turbine (Single Cycle)

Type of Thermal Energy Generation: Electricity only EGU

ENERGY GENERATION INFORMATION

Gross Generation: MWh

Net Generation: MWh

Subpart A (points to Subpart A overview section)

Subpart C (points to Subpart C overview section)



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

The screenshot shows the user interface of the Cal e-GGRT system. At the top, there are navigation tabs: HOME, FACILITY MANAGEMENT, and DATA REPORTING. Below the tabs, there is a sidebar on the left with a help icon and the text 'Cal e-GGRT Help' and 'About Cal e-GGRT Home'. In the main content area, there is a notification bell icon followed by the text 'ACTION REQUIRED:'. Below this, there is a table with two columns: 'Action' and 'Facility or Supplier'. The table contains one row with the text 'Sign Certificate of Representation' under the 'Action' column and 'KL40 Stage Test' under the 'Facility or Supplier' column.

Action	Facility or Supplier
Sign Certificate of Representation	KL40 Stage Test

Cal e-GGRT Updates



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

SUBMIT ANNUAL REPORT

If all subparts are completed and Validation Messages addressed to your satisfaction, you are ready to prepare and submit an Annual Report.

Report	Status	Submitted Date	Certification Date	Verification Date	
2019 Annual Report v1	Ready for Verification	01/02/2020 6:53 AM	01/02/2020 6:53 AM		HTML Excel XML Receipt

VERIFICATION BODY



- 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

Reminder: Batch Certifications in Cal e-GGRT

- ❑ Batch certification and submission of reports (for reporters with multiple facilities)
- ❑ Step 1 – Generate all of the reports
- ❑ Step 2 – Click on Batch Review and Certification
- ❑ Step 3 – Submit batch after final review

Batch Review and Certification

REPORTING YEAR

2017

Select All | Deselect All

	ARB ID	Facility or Supplier	Report Version	
<input type="checkbox"/>	21	ARB_TEST_EPE (Sac, CA)	11	<input type="button" value="REVIEW"/>
<input type="checkbox"/>	402	Smadar General - Training (Wonderland, CA)	1	<input type="button" value="REVIEW"/>




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 (<https://ww2.arb.ca.gov/mrr-contacts>)

Resources

- ▣ Email reporting questions to: ghgreport@arb.ca.gov
- ▣ Email verification questions to: ghgverify@arb.ca.gov
- ▣ Reporting Guidance
<https://ww2.arb.ca.gov/mrr-guidance>
- ▣ 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
<http://www.ccdsupport.com/confluence/display/calhelp/Home>
- ▣ Verification Bodies
<https://ww2.arb.ca.gov/verification-bodies>

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

Questions



Thank you for tuning in!

That's all Folks!

