Outline

- Overview
- Regulation Updates
- Preparing for 2014 Data Reporting
- Cal e-GGRT Reporting Tool Updates
- Guidance
- Other topics
- Questions

2013 Data Reporting Recap

All Reporting Entities
- 750 reports submitted
- 519 verified
  - 100% received positive emissions verification statements (includes 12 qualified positive)

Electric Power Entities
- 110 reports submitted; 76 verified
  - 34 reports retail sales only with no imports(exports)

Summary data posted for all reports
- http://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/ghg-reports.htm

Reporting Schedule

- June 1, 2015
  - Reports due for EPEs and electricity retail providers
  - No time extensions
- July 15, 2015
  - Deadline for corrections to RPS Adjustment data
- Failure to submit a report by the required deadline is a violation of the regulation for each day the report remains unsubmitted
- Key Dates Reference Page:
  - http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep-dates.htm
Verification Schedule

- September 1, 2015
  - Final Verification Statements due for all EPEs
  - No time extensions
- Start early to ensure on-time completion and to correct any issues identified during verification
- Verifiers must submit Adverse statement if verification 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 remains unsubmitted

Enforcement Summary

- Issues that could lead to enforcement actions
  - Incorrect data submitted
  - Errors leading to a material misstatement
  - Failure to fix correctable errors
  - Late reports or failure to report
  - Late verification or no verification
- ARB has completed multiple 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

Cal e-GGRT Tool Availability

- Tool available NOW
  - 2014 data reporting activated for EPEs
  - Must use updated Workbooks 1-4
    - Reflect current reporting requirements
    - Include 2014 specified source emission factors
  - Guidance on EPE requirements is posted
    - FAQ on EPE Reporting Requirements
    - FAQ on Energy Imbalance Market (EIM) Transactions Reporting

2014 Regulation Updates

- Revisions went into effect January 1, 2015
- Regulation available here: http://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-regulation.htm
- All updates are effective for 2014 data reporting
  - No exceptions were specified in section 95103(h) for EPEs
- No plans for regulation updates in 2015
Key Regulation Updates

- **CAISO Sales**: Publicly owned utilities (POU) and electrical cooperatives (co-op) must report MWhs sold into CAISO markets (section 95111(a)(12)).
- **Transmission Loss Factor (TLF)**: Specifies when TLF of 1.02 or 1.0 must be used (section 95111(b)(2)).
- **Meter Data Requirement**: Requires meter data and lesser of analysis for some imports (section 95111(b)(2)(E)).
- **REC Serial Numbers for Imports**: Requires renewable energy credit (REC) serial numbers to be reported for certain imports (section 95111(g)(1)(M)(3)).

CAISO Sales (section 95111(a)(12))

- New MRR requirement for POUs and co-ops—Must report the annual MWhs of all electricity sold into the CAISO markets for which the entity has a compliance obligation.
- Verifiers must contact ARB directly to confirm that a specific entity is not subject to this requirement.

Reporting CAISO Sales in Workbook 1

- Apply TL factor 1.02 (2% loss) when losses not supported by a California balancing authority.
- Apply TL factor 1.0 (0% loss) when losses:
  - Have been accounted for, or
  - Supported by CA balancing authority, or
  - Compensated by using electricity sourced from within California.
- Contact ARB staff with specific questions.
Transmission Loss Factor in Workbook 1

• Applies to zero emission and RPS resources except:
  – Grandfathered RPS, dynamically tagged power, untagged power including EIM, nuclear, ACS power, hydro resources where hourly output is not established by contract
• Clarifies requirement to retain meter generation data
• For applicable imports, reporter is required to compare imports listed on e-tag with actual generation from the resource

Meter Data Requirement in Workbook 1

• If e-tag value is greater, the generated value can be claimed as a specified import, with the balance claimed as “substitute power” (unspecified import)
• If generation exceeds tagged imports, the e-tag value is the specified import; the excess generation may be claimed as RPS adjustment, subject to applicable requirements
• Verifier will review sample tags, meter generation data, and the EPE hourly comparison spreadsheet
Lesser of Analysis Example

Table 3

<table>
<thead>
<tr>
<th>Description</th>
<th>Example 1 Under-Generation (MW or MWh)</th>
<th>Example 2 Over-Generation (MW or MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Metered Generation at Source A</td>
<td>85</td>
<td>115</td>
</tr>
<tr>
<td>2 Scheduled on e-Tag</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>3 Lesser Of Meter or Scheduled</td>
<td>85</td>
<td>100</td>
</tr>
<tr>
<td>4 Zero Emission Specified Source Claim</td>
<td>85</td>
<td>100</td>
</tr>
<tr>
<td>5 Substitute Power</td>
<td>15</td>
<td>0</td>
</tr>
<tr>
<td>6 Potential RPS Adjustment Claim</td>
<td>0</td>
<td>15</td>
</tr>
</tbody>
</table>

REC Serial Numbers for Specified Source Imports (section 95111(g)(1)(M)(3))

- RECs do not need to be retired
- REC serial numbers must still be reported for any California RPS-eligible resources
  - Failure to report REC serial numbers by the verification deadline = nonconformance = qualified positive verification statement
- Implemented for 2014 data reported in 2015, and future years

REC Serial Numbers for Specified Source Imports – in Workbook 1

- No RPS adjustment can be claimed without retired REC reported in “REC serial” tab
- RECs must be retired in the subaccount by July 15th
- RECs retired must be used to comply with California RPS requirements during the same year the RPS adjustment was claimed (section 95852(b)(4) of Cap-and-Trade)
- RPS adjustment can only be claimed for electricity procured for RPS compliance but not delivered to California by the reporting entity

REC Retirement for RPS Adjustments (section 95111(g)(1)(M)(1))
**REC Retirement for RPS Adjustments in Workbook 1**

**Energy Imbalance Market (EIM)**

- California ISO Energy Imbalance Market began operation on November 1, 2014
- Electricity imports/exports documented via CAISO Market Results Interface (CMRI)
- EIM market participants subject to same reporting and verification requirements as other EPEs

**Reporting Tips**

- Start early, finish early
- Involve verifier as soon as possible
  - Include enough time to make verification revisions
- Update DR, ADR, Agents if needed
  - They have access to system until you remove them
- Contact ARB for any questions about requirements ([ghgreport@arb.ca.gov](mailto:ghgreport@arb.ca.gov))
- Check ARB guidance: [http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.htm](http://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/guidance.htm)
### Verification Tips
- EPE must demonstrate to verifier that “covered emissions” have no material misstatement and no correctable errors to avoid adverse verification statement.
- Verifier uses risk-based sampling and professional judgement as to whether standard of reasonable assurance is met.
- If verifier and reporter disagree on requirements, always contact ARB for assistance.
- GHG Inventory Program documentation must clearly describe or reference how EPE ensures:
  - All electricity imports, exports, and wheels are included and appropriately accounted.
  - All RPS adjustments and qualified export adjustments meet eligibility criteria.
  - All REC serial numbers are reported for California-eligible renewable energy resources claimed in specified imports or RPS adjustments.
- GHG Inventory Program documentation must include all ARB written interpretations provided to EPE.

### Key Reporting Dates

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 2</td>
<td>Regulatory deadline: Due date for electric power entities to register specified facilities outside California</td>
</tr>
<tr>
<td>February 18</td>
<td>Public release of Cal e-GGRT</td>
</tr>
<tr>
<td>April 10</td>
<td>Regulatory deadline: Reporting deadline for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting</td>
</tr>
<tr>
<td>June 1</td>
<td>Regulatory deadline: Reporting deadline for electric power entities and those subject to abbreviated reporting</td>
</tr>
<tr>
<td>July 15</td>
<td>Regulatory deadline: Deadline for corrections to RPS Adjustment data required for electric power entity data reports</td>
</tr>
<tr>
<td>September 1</td>
<td>Regulatory deadline: Final verification statements due (emissions data and product data)</td>
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### Resource Web Sites
- Email reporting questions to: ghgreport@arb.ca.gov
- Cal e-GGRT Main Help Page [http://www.ccdsupport.com/confluence/display/calhelp/Home](http://www.ccdsupport.com/confluence/display/calhelp/Home)

### GHG Reporting Contacts

<table>
<thead>
<tr>
<th>Subject Matter</th>
<th>Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manager – Climate Change Reporting Section</td>
<td>Briana Aguila, Manager</td>
</tr>
<tr>
<td>916.324.0919</td>
<td></td>
</tr>
<tr>
<td>General Reporting Requirements, Stationary Combustion, Miscellaneous Sectors (cement, glass, pulp and paper, etc.), Cal e-GGRT Reporting</td>
<td>Patrick Gaffney, 916.322.7303</td>
</tr>
<tr>
<td>Reporting Tool Registration and General Questions</td>
<td>Karen Lutter, 916.322.8620</td>
</tr>
<tr>
<td>Electricity Generation and Cogeneration Facilities</td>
<td>Karen Lutter, 916.322.8620</td>
</tr>
<tr>
<td>Electricity Retail Providers and Electricity Marketers</td>
<td>Wade McCartney, 916.327.0822</td>
</tr>
<tr>
<td>Fuel and CO2 Suppliers - Transportation Fuels, Natural Gas, LPG, CO2</td>
<td>Syd Partridge, 916.445.4292</td>
</tr>
<tr>
<td>Petroleum Refineries, Hydrogen Plants, Oil &amp; Gas Production, and Associated Product Data</td>
<td>Board Mosher, 916.323.1185</td>
</tr>
<tr>
<td>Manager – Greenhouse Gas Report Verification</td>
<td>Renee Lawver, Manager</td>
</tr>
<tr>
<td>916.322.7062</td>
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</tr>
<tr>
<td>Chief – Program Planning and Monitoring Branch</td>
<td>Jim Aguila, Chief</td>
</tr>
<tr>
<td>916.322.8343</td>
<td></td>
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