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

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
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<tbody>
<tr>
<td>April 10</td>
<td>Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting</td>
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<tr>
<td>June 1</td>
<td>Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting</td>
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<tr>
<td>August 10</td>
<td>Regulatory Deadline: Verification statements due (emissions data and product data)</td>
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Slides available here:
https://ww2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training
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://www2.arb.ca.gov/our-work/programs/enforcement-policy-reports/enforcement-case-settlements

Reporting Tips

- Check CARB guidance materials for revised requirements: https://www2.arb.ca.gov/mrr-guidance
- Utilize other resources available on the Mandatory Reporting website: https://www2.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 verifier 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

- 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

<table>
<thead>
<tr>
<th>#</th>
<th>Regulation Amendment</th>
<th>Regulation</th>
<th>Regulation Section</th>
<th>Affected Reporting Year(s)</th>
<th>Description of Regulatory Update</th>
<th>Side Note (1)</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Verification Services Requirements</td>
<td>2018 MRR</td>
<td>95105(c)</td>
<td>Verification</td>
<td>Verifiers must separately conduct a material measurement evaluation for covered product data related to thermal and non-thermal emissions.</td>
<td>See</td>
</tr>
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</table>
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.

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

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

Certifying and Submitting a Report

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

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.
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 cannot be certified and submitted with a pending COR.

Cal e-GGRT Updates

- 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.
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

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://www2.arb.ca.gov/mrr-guidance
- Reporter Training Presentations https://www2.arb.ca.gov/our-work/programs/mandatory-greenhouse-gas-emissions-reporting/training
- Cal e-GGRT Training https://www2.arb.ca.gov/mrr-tool
- Cal e-GGRT Main Help Page http://www.ccdsupport.com/confluence/display/calhelp/Home
- Verification Bodies https://www2.arb.ca.gov/verification-bodies

GHG Reporting Contacts

<table>
<thead>
<tr>
<th>Program / Sector</th>
<th>Contact</th>
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</thead>
<tbody>
<tr>
<td>Manager – Climate Change Reporting Section</td>
<td>Syd Partridge 916.445.4292</td>
</tr>
<tr>
<td>General Reporting Requirements, Stationary Combustion, Electricity Generation and Cogen, Miscellaneous Sectors, Cal e-GGRT Reporting</td>
<td><a href="mailto:gghreport@arb.ca.gov">gghreport@arb.ca.gov</a></td>
</tr>
<tr>
<td>Reporting Tool Registration and General Questions</td>
<td>Karen Lutter 916.322.8620</td>
</tr>
<tr>
<td>Electricity Retail Providers and Electricity Marketers</td>
<td>Wada McCartney 916.327.0822</td>
</tr>
<tr>
<td>Fuel and CO₂ Suppliers (Transportation Fuels, Natural Gas, LPG, and CO₂)</td>
<td>Smadar Levy 916.324.0230</td>
</tr>
<tr>
<td>Petroleum Refineries, Hydrogen Plants, Oil &amp; Gas Production, and Associated Product Data</td>
<td>Darry Patel 916.440.8256</td>
</tr>
<tr>
<td>Manager – Greenhouse Gas Verification Section</td>
<td>Ryan Schauland 916.324.1847</td>
</tr>
<tr>
<td>More contact information at: <a href="https://ww2.arb.ca.gov/mrr-contacts">https://ww2.arb.ca.gov/mrr-contacts</a></td>
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