Step-by-Step Guide for Verifiers Using
CARB’s Greenhouse Gas Reporting Tool (Cal e-GGRT)

Reporting entities subject to the Mandatory Greenhouse Gas (GHG) Reporting Regulation are required to submit an annual emissions data report to CARB using Cal e-GGRT, an on-line electronic reporting tool (https://ww2.arb.ca.gov/mrr-tool). To submit Conflict of Interest (COI) forms for 2019 data and onward, lead verifiers must use Cal e-GGRT. Reporting entities associate their reported data with a verification body (VB), and verification bodies establish a verification team in Cal e-GGRT. This allows each verification team member to access reported data. The lead verifier can return the emissions data report to the reporting entity for revisions using Cal e-GGRT, as well as submit verification statements at the conclusion of verification services. For questions on how to report GHG emissions and covered product data to CARB, please contact ghgreport@arb.ca.gov. For verification questions, please contact ghgverify@arb.ca.gov.


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Quick Reference Guide

The following table shows a quick overview for verifiers using Cal e-GRRT. More detailed screenshots and explanations are provided in subsequent pages, along with an overview of what the reporting entity views in the Tool. Please email ghgverify@arb.ca.gov for assistance.

| Registration 1 | Skip to “COI 1” if you have already registered. Register as a verifier in the Tool (do not use your consultant account) https://ssl.arb.ca.gov/Cal-eGGRT/login.do (You will have received an email either from CARB, or from a lead verifier for your verification body. If you have not yet received an email invitation, send an email to ghgverify@arb.ca.gov). |
| Registration 2 | Sign and send your Electronic Signature Agreement to: Mandatory Reporting Program (c/o Karen Lutter) California Air Resources Board 1001 I Street, PO Box 2815 Sacramento CA. 95812 If you want to start sooner, in addition to sending it via mail, email the ESA to ghgreport@arb.ca.gov. Upon approval of your ESA by CARB staff, you will have access to the Tool. |
| Registration 3 | After CARB approves your registration, copy the Invitation Code from the email you receive, log into Cal e-GGRT and paste the Code into the box. This step provides access to reported data. Log out and back in, to ensure you can view data. Note: There are two different locations (text boxes) to input a code – one for the first lead verifier responding to a facility invitation on the home page, and one on the verification tab for responding to a verifier invitation to become part of a newly formed verification team. |
| Registration 4 | If you are the first lead verifier in Cal e-GGRT for your verification body (VB), click on Verification Body and add all verifiers (including subcontractors) that you need this year on verification teams. You can add new verifiers at any time. Your verifiers will not show up immediately. They will need to register as new users and accept the verification team assignment before their names are visible on the verification team. No one can view reported data until they have been added to a verification team. |
| COI 1 | Create a verification team (lead verifier must create the team) |
| COI 2 | Click on the Verification tab at the top of the screen, and choose one or more reporting entities to verify |
| COI 3-6 | Choose a site visit date and add verification team members; state the risk level; address all the other questions and click “Save”, review validation messages, then submit COI |
| Verification 1 | Access reports and view them. |
| Verification 2 | Unlock reports. |
| Verification 3-4 | Verify a report and review submitted verifications. |
| Verification 5 | Upload confidential documents in Cal e-GGRT. |
Detailed Steps for Using Cal-e-GRRT

Registration 1 – New User Registration

For your first time in the Tool, register as a new user using the “New User Registration” button.

Registration 2 – Electronic Signature and Use Agreement

Send CARB a signed copy of your Electronic Signature and Use Agreement (ESA).
Registration 3 – Registration Code

Use the registration code from the email you received from CARB or from the first lead verifier in the Tool that invited you to join a verification team (code = 9511).

Do not forget your passwords and challenge questions - you will need these later.

Registration 4 – Invitation Code

A lead verifier for a verification body accepts an email invitation from CARB by pasting the invitation code into the box on the Verification tab (not the Home page). Request an email from CARB via ghgverify@arb.ca.gov if you did not yet receive one for your VB. Log out, then log back in if your invitation does not work that first time.

Under the verification body tab, click on your VB so you can view verifiers and verification teams.
To invite other verifiers from your VB or subcontractors, click on “Add a Verifier,” and select individuals to receive invitations.

You will not see individual verifiers until they have responded to the emailed invitation you sent them.
The verifier will need to accept the invitation to join a verification team (make sure it’s a verifier invitation on the Verification tab, not a facility invitation on the Home page).

If needed, update your information by clicking on My Profile.

Update your email address in Cal e-GGRT if it is incorrect using My Profile. Notify ghgverify@arb.ca.gov any time your email changes.
Submitting a Conflict of Interest Self-Assessment Form to CARB via Cal e-GGRT

COI 1 – Add a Verification Team

To create a verification team, select the Verification Bodies tab and choose your VB (ARB Training VB 1, in this example).

![Verification Bodies Table]

This will display all members of the VB that have been granted access to Cal e-GGRT.

![Verification Body Summary]

Please note that on this page the system defaults to displaying the current year. Previous years can be selected from the drop-down list.

Then click on “Add a Verification Team” which opens a COI form page.
COI 2 – Select reporting entity (RE)

Click on “Add a reporting entity”, and then search for the reporting entity for which you want to create a COI submittal. Search results can be filtered by reporting entity name or CARB ID.

Reporting entities meeting your search criteria will be displayed if they:

- Were verified last year (by any VB), or
- Are new reporting entities that have chosen your VB

Selecting multiple reporting entities:

Verifiers have the option of creating a single verification team for multiple reporting entities. This streamlines the COI submittal and approval process for those entities. However, those verifications must have the same verification team members and the same answers to COI-related questions. If any of the responses to COI questions are different among different reporting entities, a separate COI needs to be submitted for
each of those facilities. To select multiple reporting entities to be included in a single COI submittal, simply check “Add” for multiple reporting entities.

**COI 3 – Choose a site visit and add verification team members**

First, read the instructions and click the box indicating that you have done so. The link to the COI instructions is also available here: [https://ww3.arb.ca.gov/cc/reporting/ghg-ver/coi-instructions.pdf](https://ww3.arb.ca.gov/cc/reporting/ghg-ver/coi-instructions.pdf).

**Choose a site visit date, or check “None.”**

You may change the date in the future, if needed, by resubmitting a revised version of the COI form for CARB approval. If the site visit does not or will not occur on the date listed on the approved COI form, please update the COI or notify CARB prior to that date.
Choose verification team members

The sector specific accreditations of the lead verifier and additional team members are shown on the page.

COI 4 – State the risk level

When medium or high risk is chosen, a mitigation plan upload button appears on the form. Only one mitigation plan file is allowed per submittal. If you have multiple, medium risk facilities in the same COI submittal, you must include all mitigation plans in one file, or submit a separate COI for each entity.
**COI 5 – Address all other questions**

Address all questions in the COI interface regarding past services for the reporting entity. The questions are unchanged from the previous COI form.

Choose “All No” if your VB, verification team, and subcontractors have not provided services to the reporting entity or related entity within the past five years. Otherwise, answer each question individually.

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**Describe services provided to Reporting Entity, if applicable**

To disclose other services your verification body has provided to the reporting entity (or related entity) within the past five years, click on “Add a service”.

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The figure below displays the data inputs in a table in Cal e-GGRT.

<table>
<thead>
<tr>
<th>Service Dates</th>
<th>People providing service</th>
<th>Description and location of service</th>
<th>Description Option</th>
<th>Services were conducted under impartiality provisions substantively equivalent to §95133</th>
<th>Fee</th>
<th>Delete</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 1, 2018 - December 28, 2018</td>
<td>Chris Holm, Ryan Schauland</td>
<td>Water quality consulting work provided to reporting entity's Bakersfield location under common operational control</td>
<td>B</td>
<td>N</td>
<td>10000</td>
<td>x</td>
</tr>
</tbody>
</table>

COI 6 – Save, review validation messages, and submit COI

Click “Save” at any time to save progress. This does NOT submit the COI for review.

The COI form contains built-in validation messages. These validation messages do not prevent you from submitting your COI form, but they do provide reminders to include all required details before you complete your submittal.

The following COI validation checks are performed in Cal e-GGRT:

1. Facility Count – a VB team must select at least one reporting entity
2. Verification Body Rotation:
   a. Facility must not be verified by the same VB for more than 6 years in a row
   b. Upon switching to another VB, a facility must not be verified by the previous VB for at least three years
3. “View COI Instructions is required”: The verifier setting up a team must certify that he/she has read the COI instructions by checking the box in Cal e-GGRT.

4. “Self-evaluation is required”. The risk level must be selected in the submittal (low/medium/high risk).
5. “Conflict of Interest Mitigation Plan is required”: If the risk level is medium or high, a COI mitigation plan is required.

6. If the risk level is high, a message is shown indicating that the submission will likely not be approved.

7. “Past Services are required”. Indicate whether past services were provided to the reporting entity or related entity.

8. “A Lead Verifier is required”. Add a lead verifier to the team.

9. An Independent Reviewer is required.

10. “Same team member has been chosen for multiple roles”. Verifiers may not occupy multiple roles on the same verification team.

11. A VB team should include verifiers whose accreditations match the selected reporting entities’ selected subparts.

12. A site visit date, or “none” must be chosen for each selected reporting entity. If not, the user is prompted with the following message:
13. “Organization chart is missing”. An organizational chart is only required to be submitted to CARB once per year.

Revise the form, address all notification messages, and click “Save” again.

Please consider checking with CARB staff the first time before you submit the COI, and any time you have questions. After the validation messages are cleared, enter your password and submit the COI form to CARB.

At any time, you can click “Save” to save your work and review the validation messages and make additional changes. The form is only submitted to CARB for review when you have entered your password and clicked “Submit.”

**Monitor, revise and verify**

**COI 7 - Monitor COI status and data report dashboard**

Verifiers can monitor the COI approval status, as well as the submittal and certification status of emissions data reports, as shown below.
The status of a verification body’s COI submittal can be one of the following:

- **In Progress** (not submitted to CARB, VB can still edit or delete the submittal),
- **Submitted** (has been submitted to CARB but not yet reviewed; verifiers can still delete form or edit the form without creating a duplicate version of the form),
- **Under Review** (CARB has locked the submittal while reviewing; changes require a new version to be submitted)
- **Denied** (edits required; edit the denied submittal which creates a new version number; CARB staff will review the revised form)
- **Approved** (verification may proceed; can be edited if changes required)

The hyperlink (as illustrated in the above table for Facility b1) gives access to the emissions data report. It is available if:

- the reporting entity is associated with a VB and
- if the viewing verifier is on the team

Reviewing an emissions data report should only be done after COI approval.

The verification body may want to edit and resubmit a denied COI as a new version. If so, please explain the change in the text box provided at the bottom of the revised COI form before resubmitting the changes.

**COI 8 - Revising COI Forms**

If edits to a COI form are required, navigate to the original submittal, click on the icon under “View/Edit”, edit and resubmit.

To change a site visit date, add a verification team member, or to edit responses to COI questions, **edit the existing COI, rather than creating a new version**.

If the COI status is “in progress” (saved but not submitted) or “submitted,” the same version can be revised and resubmitted multiple times without creating a “new” version by using the “View/Edit” button. Password entry is available at the bottom of the form.

If COI status is “under review,” “approved,” or “denied,” you must also click “Edit Team” to create a new version. Your initial responses are greyed out until “Edit Team” is chosen at the top of the COI form.
**Version History of COIs Available for Review**
Click “Version” link (V.2) to view a summary of past submittals. In the example below, you can see that a site visit date was added, and the verification team members and roles were changed. Version 2 has been submitted but has not been approved.

![Version History Table](image)

**Important reminder:** Please avoid submitting two COIs for the same reporting entity whenever possible. If the COI form has been "submitted" and you find that edits are required, please make the changes in the current version and resubmit. Only create a new version when CARB has already approved the previous version. If two versions are submitted for the same reporting entity and VB, CARB staff will contact the submitted verifier to ask them to remove the outdated version.

If a different VB was chosen for a given reporting entity, you will see a message and will not have access to the emissions data report.

![Example Table](image)

If your VB was chosen by the reporting entity in Cal e-GGRT, the report is already certified, and the viewing verifier is on the verification team, click on the hyperlink in the verification tab to view the report, then continue the process to verify the report.
Verification 1 – Accessing and Viewing Reports

The emissions data report is viewable in HTML and Excel. The emissions data report verification interface will also display the current COI status. If the status is “submitted”, as in the example screen capture below, your most recent revision of the COI submittal has not yet been approved and you must request approval before continuing to provide verification services.

The emissions data report can be viewed when the report status is set to verification ready. The verification body is encouraged to download a copy of the emissions data report before the report is set to revisions requested.
All spreadsheets uploaded into Cal e-GGRT by the operator should be reviewed, including the subpart attachment, alternative methods and calibration postponements. This review can only occur when the report status is set to verification ready. Download copies of these documents before the report is set to revisions requested, or the report is verified.

**Verification 2 – Returning and Unlocking Reports**

If errors in the emissions data report have been identified and discussed with the reporting entity, unlock the report and return it for revisions.

Each time you return a report or submit a verification statement, you will need your password, and responses to the challenge questions.

When you return the report for revisions, an email will be sent to your client.
When you successfully unlock a report, Cal e-GGRT will confirm the change.

After returning the report for revisions, you can view the status of other reports associated with your verification body, but you will need to wait until the revised report has been re-certified before you can view the report again. If a verification team has already been created an email notification is sent to the lead verifier when the report has been certified.
Verification 3 – Verifying a Report

To verify a report, click on the hyperlink in the verification tab to view the report, then continue the process to verify the report.

Browse, then upload the verification statement form.

Click the corresponding radio buttons, then enter your password to submit the verification statement to CARB.
In addition to attaching the verification statement form in Cal e-GGRT, you are also prompted to include qualifying comments to support a qualified positive or adverse verification statement. When you submit a verification statement, Cal e-GGRT will acknowledge the change.

Verification 4 – Reviewing Submitted Verifications

After the lead verifier submits a verification statement but before the verification deadline, check to ensure each verification statement is accurate and is associated with the correct reporting entity. Notify CARB before the verification deadline if an incorrect
verification statement was submitted in Cal e-GGRT so CARB can reset the emissions data report to “verification ready” and the lead verifier can resubmit the correct verification statement electronically. If an incorrect attachment has been submitted, submit a corrected statement in Cal e-GGRT.
Verification 5 - Uploading Confidential Documents in Cal e-GGRT (if needed)

Verifiers should use the following procedure to send confidential documents to CARB verification staff as part of CARB audits. Click on My Profile, then Exchange Files with CARB, then click Browse and choose the file. Click on Upload to upload the file.

[Image: Instructions and screenshot of Cal e-GGRT interface]
Cal e-GGRT notifies CARB verification staff via email that a document has been uploaded. This data exchange is between the verifier and CARB staff only. Reporting entities cannot view these documents. All documents are treated as confidential. A similar process is available for CARB staff to upload documents for verifiers, which is shown here:

Click on the document to retrieve the file.

**What the reporting entity sees in Cal e-GGRT**

The reporting entity must choose a VB before you can view their data.

After choosing a VB, the reporting entity sees their chosen VB below their reports.
The reporting entity sees the status of all reports – including confirmation that a report was verified.

Update your email address in Cal e-GGRT if it has recently changed so you are notified when reports are certified and verified.

For reporting GHG data to the U.S. EPA, please use e-GGRT here: https://ghgreporting.epa.gov/ghg/login.do

Part 2: Set Aside Reverification Procedures

When CARB sets aside a verification statement and a new verification body is required to verify the emissions data report, it is critically important for the verification body to contact CARB to discuss the scope of the reverification.

The new verification body should request from the reporting entity a copy of the set aside letter sent from CARB to the reporting entity. The new verification deadline is typically 90 days from the date of the letter, and the verification body should contact CARB to confirm the specific date. However, the reporting entity may request a shorter timeline in order to complete verification in a case where an important Cap-and-Trade deadline is eminent. The verification body must confirm from CARB’s set aside letter which verification statement is required to be re-verified:

a. the emissions data verification statement or

b. the product data verification statement or

c. both

If the reporting entity has reported both emissions data and product data and received prior verification statements and only one has been set aside, follow the applicable steps below.

If only the product data verification statement was set aside, the verification body is only required to review the covered product data and is not required to review other parts of the emissions data report. Because the previous emissions data verification statement remains valid, the verification body must:
1. Confirm with CARB via ghgreport@arb.ca.gov that CARB staff has determined that the emissions data reported has not been altered since the initially verified report.

2. Click radio button for product data verification statement:  Positive, Qualified Positive, or Adverse.

3. Type the following in the product data verification statement text box: “Reverification of product data only.” (Include qualifying statements if Qualified Positive or Adverse.)

4. Click the radio button for emissions data verification statement based on previous verification, consistent with attached verification statement of previous verifier: Positive or Qualified Positive.

5. Type the following in the emissions data verification statement text box: “Previous emissions data verification statement was not set aside and remains valid. Previous verifier indicated the following: [Include previous qualifying statements from attachment if Qualified Positive.]”

If only the emissions data verification statement was set aside, the verification body is not required to review the covered product data. Because the previous product data verification statement remains valid, the verification body must:

   1. Confirm with CARB via ghgreport@arb.ca.gov that CARB staff has determined that the covered product data reported has not been altered since the initially verified report.

   2. Click radio button for emissions data verification statement:  Positive, Qualified Positive, or Adverse.

   3. Type the following in the emissions data verification statement text box: “Reverification of emissions data only.” (Include qualifying statements if Qualified Positive or Adverse.)

   4. Click radio button for product data verification statement based on previous verification, consistent with attached verification statement of previous verifier: Positive or Qualified Positive.

   5. Type the following in the product data verification statement text box: “Previous product data verification statement was not set aside and remains valid. Previous verifier indicated the following: [Include previous qualifying statements from attachment if Qualified Positive.]”

If both emissions and product data were set aside, the verification body is required to re-verify the entire emissions data report and indicate in the qualifying comments that both data were re-verified.