

Attachment B to Resolution 14-32

Mandatory Reporting Regulation

Topics Subject to Potential 15-Day Changes

Introduction

This document provides an overview of the topics ARB staff now intends to propose for further public consideration as part of a subsequent 15-day comment period. This list is not exhaustive and does not include minor technical changes that may be proposed. Staff will continue to coordinate with stakeholders in the development of the regulatory text. This list in no way limits ARB's authority to make other changes to the proposed regulatory amendments, consistent with the requirements of California law.

Definitions

Staff is proposing updates to product data and other definitions to clarify reporting requirements and to align with the Cap-and-Trade Regulation.

Electric Power Entities

Transmission Line Loss: Staff will propose further clarifications to the requirements for accounting for transmission line loss associated with specified source electricity. Staff will continue to work with stakeholders to evaluate these requirements and craft appropriate language.

Hourly Meter Generation Data: Staff has worked with stakeholders to craft the proposed hourly meter generation requirements and included exemptions. Staff will continue to work with stakeholders to refine the language in 15-day changes.

Sales into the CAISO Market: Staff will propose to clarify the requirements related to reporting retail sales information into the California Independent System Operator market based on stakeholder comments. Specifically, staff will propose to exempt entities that consign all allowances to auction from these reporting requirements. Staff is working with stakeholders to determine what reporting method(s) to specify in the regulation

Imported Electricity Specified Source Emission Factors: In the proposed amendments staff clarified which data sources are used to develop ARB's specified source emission factors for imported power. Staff is proposing additional 15-day changes in this area to further clarify ARB's process and to ensure consistency with the proposed 111(d) federal GHG power plant reduction requirements.

Refineries and Hydrogen Producers

Product Data: Staff will propose additional clarifications to definitions related to product data for refineries and hydrogen producers. Staff will propose to clarify that CWB liquid throughputs should be corrected for temperature. Staff is working with stakeholders to determine what method(s) to specify in the regulation.

Product Data Reporting Requirements for Bathroom Tissue

Staff will propose a clarification that water absorptive capacity for bathroom tissue must be measured in each data year in which tissue covered product data are reported.

Petroleum and Natural Gas Systems

Staff will be clarifying what constitutes a sub-facility and the applicability of reporting requirements for small gas processing plants as part of onshore oil and gas production facilities. Staff will also clarify the high heat value measurement frequency requirements related to product data reporting and that gas-water ratio is required for associated gas estimation using flash liberation tests. Also, staff will propose to change the reporting units for dry gas from MMBtu to Mscf.

In the proposed regulation staff inadvertently removed a requirement that would allow reporters to use engineering estimates for reporting emissions associated with compressor startup emissions. Staff will propose to add that requirement back in the 15-day changes. Staff will also propose to clarify what constitutes a "dig-in" and what equipment leaks are to be reported based on stakeholder comments.