GHG Reporting Kickoff for 2018 Data
Regulation for the Mandatory Reporting of Greenhouse Gas Emissions
January 24, 2019

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 on March 5, 2019.
2017 Data Reporting Recap

- 796 reports submitted
- 517 verified
  - 99.6% received positive / qualified positive emissions verification statements
- Other reports not subject to verification (i.e., abbreviated reporters or retail providers with no imports/exports)
- 2017 summary data posted for all reports here:
  - [https://ww2.arb.ca.gov/mrr-data](https://ww2.arb.ca.gov/mrr-data)
## 2019 Key Reporting Dates

[https://ww2.arb.ca.gov/mrr-key-dates](https://ww2.arb.ca.gov/mrr-key-dates)

<table>
<thead>
<tr>
<th>Date</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>April 10</strong></td>
<td>Regulatory Deadline: Reports due for facilities and suppliers of fuels and carbon dioxide, except when subject to abbreviated reporting</td>
</tr>
<tr>
<td><strong>June 3</strong></td>
<td>Regulatory Deadline: Reports due for electric power entities and those subject to abbreviated reporting</td>
</tr>
<tr>
<td><strong>July 18</strong></td>
<td>Deadline for corrections to RPS Adjustment data required for electric power entity data reports (i.e., 45 days following the emissions data report due date)</td>
</tr>
<tr>
<td><strong>August 12</strong></td>
<td>Regulatory Deadline: Verification statements due (emissions data and product data)</td>
</tr>
</tbody>
</table>
Reporting and Verification Schedule

- Time crunch for verifiers!
  - 1st year of new compliance period → Verifiers have to complete site visits for all clients and may have new clients

- 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://www.arb.ca.gov/enf/casesett/casesett.htm
General Reporting and Verification Information
Reporting Tips

 Use 2016 MRR to report 2018 data:  

 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 95101(h)] or are ceasing operations [95101(i)], contact CARB staff

 Contact CARB for any questions about requirements (ghgreport@arb.ca.gov)

 Save and file any CARB responses as part of your GHG Monitoring Plan
Verification Essentials

- Must hire a new verifier after six years with the same verification body
  - Change of VB automatically requires a site visit

- All entities subject to verification will have a site visit this year due to new compliance period

- Be prepared to trace data to its origin, especially during site visit

- 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
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 early
  - Communicate promptly to ensure important issues are discussed early
Summary of Revisions to MRR
Revisions Effective for 2018 Data

Summarized in **Applicability for 2016 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

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Applicability for 2016 MRR Revisions – Reporting Guidance for California’s Mandatory GHG Reporting Program

*Note: Data year 2017 = 2017 data reported in 2018; Data year 2018 = 2018 data reported in 2019, etc.*

<table>
<thead>
<tr>
<th>#</th>
<th>Regulation Amendment</th>
<th>Regulation Section</th>
<th>Affected Reporting Subpart(s)</th>
<th>Description of Regulatory Update</th>
<th>Data Year Revision is Applicable*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Fuel Suppliers - Applicability</td>
<td>95101(b)(3)</td>
<td>Subpart NN</td>
<td>The applicability threshold determination for fuel supplier emissions must now include: • emissions resulting from imported LPG, CNG, and LNG; • emissions resulting from intrastate pipelines delivering natural gas; • all natural gas liquid fractionator emissions; and, • all emissions from operators of LNG production facilities that produced LNG products from natural gas received from interstate pipelines.</td>
<td>2018</td>
</tr>
<tr>
<td>2</td>
<td>Onshore Production - Flaring</td>
<td>95101(e), 95101(b)(2)</td>
<td>Subarticle 5 (95150-95158)</td>
<td>Oil and gas facilities must include flaring emissions in the 10,000 metric ton CO2e threshold determination, and report the flaring emissions if the threshold is exceeded.</td>
<td>2018</td>
</tr>
<tr>
<td>3</td>
<td>Cessation of Reporting and Verification</td>
<td>95101(h)</td>
<td>All</td>
<td>Revisions to cessation for facilities, suppliers, and electricity importers to clarify requirements for exiting the GHG reporting program.</td>
<td>2018</td>
</tr>
</tbody>
</table>
**Major Revisions Effective for 2018 Data**

- **Calculating total emissions relative to thresholds:** Entities must sum specified fuel supplier emissions with facility emissions to calculate total emissions for determining applicability. If reporting threshold is exceeded, both facility and supplier emissions must be reported. [95101(b)(3)]

<table>
<thead>
<tr>
<th>Example</th>
<th>Data Year</th>
<th>Supplier Emissions (MTCO2e)</th>
<th>Facility Emissions (MTCO2e)</th>
<th>Applicability</th>
<th>Reporting Subparts</th>
<th>Total Emissions Reported (MTCO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NGL Fractionator</td>
<td>2017</td>
<td>18,000</td>
<td>8,000</td>
<td>R</td>
<td>NN</td>
<td>18,000</td>
</tr>
<tr>
<td></td>
<td>2018</td>
<td>18,000</td>
<td>8,000</td>
<td>R, V, C&amp;T</td>
<td>C, NN</td>
<td>26,000</td>
</tr>
<tr>
<td>Onshore petroleum production facility with gas plant delivering to end-users</td>
<td>2017</td>
<td>3,000</td>
<td>11,000</td>
<td>R</td>
<td>C, W</td>
<td>11,000</td>
</tr>
<tr>
<td></td>
<td>2018</td>
<td>3,000</td>
<td>11,000</td>
<td>R</td>
<td>C, W, NN</td>
<td>14,000</td>
</tr>
</tbody>
</table>
Major Revisions Effective for 2018 Data

“Facility” definition for onshore petroleum and natural gas production:
Onshore natural gas processing equipment owned/operated by the facility owner/operator is considered to be “associated with a well pad” unless it is required to be reported as part of a separate facility.

Emissions Reported for 2017:
10,000 + 10,000 + 4,000 = 24,000 MTCO2e

Emissions Reported for 2018:
10,000 + 10,000 + 4,000 + 2,000 = 26,000 MTCO2e
→ Subject to verification and C&T
Major Revisions Effective for 2018 Data

- Point of regulation change for imported LPG, LNG, and CNG, from consignee to importer
  - Refer to “Suppliers of Transportation Fuels and Natural Gas Fuels” guidance document (https://www.arb.ca.gov/cc/reporting/ghg-rep/guidance/fuel-supplier.pdf), or contact staff for assistance

- Transportation fuel suppliers required to report volumes of fuel excluded from emissions reporting
  - Excluded volumes reported separately for: RBOB, Diesel No. 1 and 2, Ethanol, Biodiesel, and Renewable Diesel
Updates to Guidance Documents
Guidance Updates

- Updated guidance documents available: [https://ww2.arb.ca.gov/mrr-guidance](https://ww2.arb.ca.gov/mrr-guidance)

- Guidance documents updated to:
  - Provide new guidance for MRR amendments going into effect for 2018 data
  - Improve clarity of existing requirements
## Documents Revised for MRR Changes

**Effective for 2018 data**

<table>
<thead>
<tr>
<th>Topic</th>
<th>Application Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicability for 2016 MRR Revisions (spreadsheet)</td>
<td>Petroleum and Natural Gas Systems</td>
</tr>
<tr>
<td>Change of Ownership or Operational Control Notification and Reporter Responsibilities</td>
<td>Hydrogen Producer Reporting</td>
</tr>
<tr>
<td>Determining Rule Applicability</td>
<td>Hydrogen Transfer Purchaser/Receiver Reporting FAQ</td>
</tr>
<tr>
<td>Measurement Accuracy and Missing Data Provisions</td>
<td>Petroleum Refineries and Coke Calciners</td>
</tr>
<tr>
<td>Suppliers of Transportation Fuels and Natural Gas Fuels</td>
<td>Petroleum and Natural Gas Systems Covered Product Data</td>
</tr>
<tr>
<td>Natural Gas Liquid Fractionators</td>
<td>Electric Power Entity Reporting Requirements Frequently Asked Questions (FAQs)</td>
</tr>
</tbody>
</table>
Cal e-GGRT Updates
Cal e-GGRT News & Reminders

- Tool available NOW for 2018 data reporting
- Cal e-GGRT release automatically migrates 2017 data configuration to 2018 reports
- Update DR, ADR, Agents (Important!)
- Electric Power Entity Workbook 1 will be activated first week of March

https://ww2.arb.ca.gov/mrr-tool
Updates for consistency with 2016 MRR

- Subpart A: No check boxes to specify why GHG emissions changed by more than 5%, only text field for narrative

- Subpart C: Buttons to report the source of geothermal generation is a binary cycle plant (closed loop system), or a geothermal steam plant (open loop system)

- Subpart NN: New field to report LPG excluded from emissions reporting for NGL fractionators and importers of fuel
Updates for consistency with 2016 MRR

- Revised workbooks:
  - Subpart Y, Additional Production Data (refinery products)
  - Subpart MM, Suppliers of Transportation Fuels Calculation and Reporting Tool
- New workbook in Subpart NN for LNG Producers to report end-user info

Suppliers of Transportation Fuels Calculation and Reporting Tool

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>[Quantity]</th>
<th>Non-emissions data required by Section 95121(d)(9)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blendstock (RDO)</td>
<td></td>
<td>Total volume excluded from emissions reporting due to demonstration of final destination outside California, use in exclusively aviation or marine applications, or previous delivery by a position holder or refiner out of an upstream California terminal or refinery tank (barrels).</td>
</tr>
<tr>
<td>Distillate Fuel DIs (Diesel No. 1 and 2)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ethanol</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Biodiesel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Renewable Diesel</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Subpart NN – LNG Received by End-Users

<table>
<thead>
<tr>
<th>End-User Details</th>
<th>Instructions: Enter information for deliveries to industrial facilities and natural gas utilities.</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Customer Name</th>
<th>Customer Address</th>
<th>Annual Energy of LNG Delivered (MMBtu)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer 1</td>
<td>Customer Address</td>
<td>2,320,500</td>
</tr>
</tbody>
</table>
Updates for Verification

- Entities can select verification body prior to certifying report - one more way to streamline verification process
- Verifiers can submit conflict of interest forms electronically via Cal e-GGRT
Updates from previous two years

- Cal e-GGRT automatically calculates biogenic emissions for Subpart C reporting

- Check box to provide consent for CARB staff to share NG purchase data with NG supplier
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)

- Time crunch for verification
  - Reach out to your verifier ASAP and select them in Cal e-GGRT

- Review changes going into effect for 2018 data:
  - Applicability for 2016 MRR Revisions spreadsheet
  - Updated guidance docs

- Lots of resources available online

- Contact CARB for additional guidance
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

<table>
<thead>
<tr>
<th>Program / Sector</th>
<th>Contact</th>
</tr>
</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:ghgreport@arb.ca.gov">ghgreport@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>Wade 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><a href="mailto:ghgreport@arb.ca.gov">ghgreport@arb.ca.gov</a></td>
</tr>
<tr>
<td>Manager – Greenhouse Gas Verification Section</td>
<td>Ryan Schauland 916.324.1847</td>
</tr>
<tr>
<td>Chief – Program Planning and Management Branch</td>
<td>Brieanne Aguila 916.324.0919</td>
</tr>
</tbody>
</table>

More contact information at:  [https://ww2.arb.ca.gov/mrr-contacts](https://ww2.arb.ca.gov/mrr-contacts)
Questions
Thank you for tuning in!

That’s all Folks!