



RY2020 MRR Kick-Off Webinar for Electric Power Entities

April 6, 2021

10th Anniversary Edition!

Outline

- Overview
- General Reporting & Verification Information
- New ONE Workbook
- EPE Data Quality Assurance
- Contacts & Questions

2019 EPE Data Reporting Recap

- 146 reports submitted
- 95 verified
 - 100% received positive / qualified positive emissions verification statements
 - CARB conducted 13 verification audits
- 2019 summary data posted for all reports here:
 - <https://ww2.arb.ca.gov/mrr-data>

Reporting & Verification Schedule 2021

○ <https://ww2.arb.ca.gov/mrr-key-dates>

Date	Activity
<u>June 1</u>	EPE & Retail Sales Reporting Deadline §95103(e)
1 st week of June:	1 st QA results period
July 16	REC Retirement Deadline for Eligible RPS Adjustments EPEs must certify RECs as retired in the workbook 45 days after the reporting deadline per this date §95111(g), so verifiers may need to unlock report
Mid-July	2 nd QA results period
July 27	Latest 14-day deadline for notification of possible adverse verification statement (CARB recommends much earlier notification)
<u>August 10</u>	Final verification statements and reports due §95103(f)

General Reporting & Verification Information

COVID-19 Concerns

- CARB expects all reporting requirements will be met – the regulation has not changed as a result of COVID
- Any issues that reporters or verifiers are having in meeting MRR requirements, as a direct result of COVID, are being reviewed by CARB on an individual basis
- If you think you will have difficulty complying with any MRR requirements, reach out to CARB as early as possible
 - E.g: Missing data issues, requests for remote verifier site visits

Reporting Tips

- Use 2018 MRR to report 2020 data:
<https://www.arb.ca.gov/cc/reporting/ghg-rep/regulation/mrr-2018-unofficial-2019-4-3.pdf>
- CARB EPE guidance materials located here: <http://ww2.arb.ca.gov/mrr-epe>
 - Updates to Retails Sales Reporting, and minor clarifications
- If you think you may be eligible for cessation of reporting or verification [§95101(h)], contact CARB staff before the reporting deadline so we can ensure regulatory requirements are 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

Reporting Tips

- Start early, finish early, and involve verifiers as soon as possible
 - Some reporters are reaching the 6-year time limit with the same verification body and must hire a new verifier. Contact CARB if unsure.
 - Complete and accurate data must be submitted by the reporting deadline
- Update DR, ADR, Agents as needed
 - Old employees, etc., have access to system until you remove them
 - Suggest at least DR and at least one ADR or agent as primary points of contact for CARB

Verification Overview & Best Practices

- Verifier keeps a detailed sampling plan §95131(b)(7)
 - Prepare sampling plan in advance of verification and ensure that your review is well-documented
- Document cross-checks, raw data sampling and query review, and your own calculations §95131(b)(6),(8)
 - Multi-pronged approach to mitigate risk of misstatement often works best
- 2018 MRR requires all issues communicated by CARB to be included in the issues log §95131(b)(11), as well as all modifications to the report made after the initial certification

Verification Tips for Reporters

- Engage with a verifier as early as possible to allow adequate time to revise data based on verification findings
- Associate your report with your verifier at any time (even if report is not yet certified)
- Correctable errors must be fixed
 - If not, the verifier must submit an adverse statement for errors that affect covered emissions
- If the verifier and reporter disagree on requirements, always contact CARB for assistance
- Ensure the GHG inventory program meets the requirements of §95105(d) and includes helpful information
 - Robust description of key personnel and procedures
 - Provide copy to verifier as soon as possible
- Provide all CARB written clarifications for reporting to verifier
- Reporters can improve the process:
 - Ensure a contract is in place prior to report submission
 - Provide data to verifiers ASAP after report submission
 - Schedule site visits, or remote desktop (webinar) review in June or earlier
- Ask questions of CARB early to ensure sufficient time to address issues

Retail Sales Only (RSO) Entities

- RSOs/RSO entities have special reporting requirements under MRR
- RSOs are entities that do not meet the definition of importer/exporter of electricity but are classified as “Retail provider[s]” meaning
 - Provide electricity to retail end users in CA and is
 - Electric corporation per Public Utilities Code (PUC) §218
 - Electric service provider per PUC §218.3
 - Local publicly owned electric utility per PUC §224.3
 - Community choice aggregator (CCA) per PUC §331.1
 - Excludes electric cooperatives per PUC §2776
- RSOs use Cal e-GGRT under EPE subpart to:
 - Report retail sales (MWh)
 - Respond to CAISO Sales questions and report CAISO Sales, if applicable (using ONE workbook)
 - Report whether RSO meets Energy Imbalance Market (EIM) Purchaser definition in 2018 MRR
 - Respond to new question on data source for retail sales being reported (Required for EIM Purchasers, optional for all other RSOs)

Enforcement Summary

- Issues that could lead to enforcement include:
 - Incorrect data submitted
 - Errors leading to a material misstatement (includes errors present at the reporting or the verification deadline)
 - Failure to fix correctable errors
 - Late reports or failure to report
 - Late verification or no verification
- CARB has completed enforcement actions related to reporting, and continues enforcement activities
- As completed, case settlements are posted here:
<https://ww2.arb.ca.gov/resources/documents/mrr-enforcement>

ONE: New EPE Reporting Workbook

ONE: Form & Function

- Introducing... **SINGLE FILE DIRECT UPLOAD!**
 - No more xml – just upload the excel file straight to the tool as is!
- ONE workbook was re-designed based on the following criteria (in order of importance):
 - Data Integrity
 - Usability
 - Aesthetics
- We appreciate any and all feedback related to using ONE
- A 'How-to' training video for ONE will be available soon
- **Please begin reporting as soon as possible and contact us as soon as any issues arise.**

ONE: Data Integrity

- Dozens of new in-cell & tool validations
 - Almost every green cell has a validation
 - Copy-paste can override validations, but...
 - Secondary validations in locked auto-populated cells only except responses from in-cell dropdowns
 - Formulas provide real-time feedback and
 - “Verify Entry” in any cell indicates data entry errors that will prevent submission in the tool
- No more custom response fields!
- ONE is completely password protected so overriding errors, formulas, or coercing data entry is restricted to CARB staff

ONE: Usability & Aesthetics

- Reporting fields and tabs pared down, standardized, and reorganized
 - No reg amendments = no new reporting requirements
 - 3 new minor data fields for clarification – only affects a handful of EPEs
- Field directions updated for clarity
- New ability to filter tables
- No more add/remove row macros
 - Fixed number of rows based on max from last decade of reporting
 - If additional rows required, contact CARB immediately – requires at least 2 business days to process
- Clean new interface with standardized text responses

EPE Quality Assurance System

CARB EPE Quality Assurance Process

- Based on feedback, CARB intends to have 2 rounds of QA, with the first occurring following the June 1 deadline, and the second occurring in mid-July
 - CARB will also track responses to QA findings communicated to us between the 1st & 2nd rounds so as to not reissue QA findings that have been addressed or are false positives
- The results of CARB's QA will be uploaded to Cal e-GGRT under "CARB Attachments"
- Both reporters & verifiers will be notified via email if any issues are identified through the QA process
 - CARB will communicate QA via email notification to all affected EPE Cal e-GGRT contacts
 - If you manage more than one EPE account, please go into the tool and review all of them
- Reminder: CARB QA does not take the place of verification. CARB QA provides systematic review but can never replicate verification

QA Issue Resolution

For Reporters

- Review the QA results that are uploaded to the 'CARB Attachments' section of your reporting account in the tool
 - If an identified issue requires correction, work with your verifier to revise report
 - If the issue has already been resolved or does not require correction, communicate this with your verifier
 - Check with your verifier or CARB if you do not understand any identified issues

For Verifiers

- Record all issues in the Log of Issues!
- Work with your reporter as you normally do to resolve all issues
 - Resolutions must be provided for all issues in the issues log even if some did not require correction
 - Check with CARB if you have any questions

Cal e-GGRT Tool Availability

- ONE workbook is **LIVE!**
 - <https://ww2.arb.ca.gov/mrr-epe> [New link!]
- Electric Power Entity module – 2020 data reporting will be active soon
 - Updated RSO module
 - <https://ssl.arb.ca.gov/Cal-eGGRT/login.do>



Resources

- Email reporting questions to: ghgreport@arb.ca.gov
- Email verification questions to: ghgverify@arb.ca.gov
- Reporting Guidance for EPEs
<https://ww2.arb.ca.gov/mrr-epe>
- Cal e-GGRT Tool Training
<https://ww2.arb.ca.gov/mrr-tool>
- Cal e-GGRT Main Help Page
<http://www.ccdsupport.com/confluence/display/calhelp/Home>
- Accredited Verification Bodies
<https://ww2.arb.ca.gov/mrr-vb>

GHG Reporting Contacts

Program / Sector	Contact
General Reporting Requirements, Reporting Helpdesk	ghgreport@arb.ca.gov
General Verification Requirements, Verification Helpdesk	ghgverify@arb.ca.gov
Manager – Climate Change Reporting Section	Syd Partridge 916.445.4292
Manager – Emissions Data Quality Assurance Section (Verification)	Ryan Schauland 916.324.1847
MRR Electricity Retail Providers & Electricity Marketers Specialists	Tess McDermott 916.272.0049
	Abajh Singh 916.322.8276
Reporting Tool Registration and General Questions	Karen Lutter 916.322.8620
More contact information at: https://ww2.arb.ca.gov/mrr-contacts	

Questions

