

Regional Greenhouse Gas Initiative

Preparing for CO₂ Budget Source Compliance: An Introductory Webinar

October 4, 2011
1:00 – 3:00 PM ET

Audio Telephone Dial-In Number: (800) 695-8859
Webinar link: <https://cc.readytalk.com/r/5jz3q1n277fe>

Webinar Outline

- **Introduction**
(1:00 – 1:05 PM)
- **Overview: 4 Stages of Compliance**
(1:05 – 1:15 PM)
- **CO₂ Budget Source Compliance Process Checklist: 8 Steps**
(1:15 – 1:45 PM)
- **Compliance in RGGI COATS: A How-To Guide**
(1:45 – 2:30 PM)
- **Live Q&A**
(2:30 – 2:50 PM) – Please submit questions via “Chat” during the webinar
- **Additional Resources & Contacts**
(2:50 – 3:00 PM)

Introduction

Purpose:

This presentation provides information to help RGGI CO₂ budget sources understand the compliance process.

Introduction

What is CO₂ Budget Source (RGGI) Compliance?

- Under each Regional Greenhouse Gas Initiative (RGGI) participating state's CO₂ Budget Trading Program, regulated power plants (**CO₂ budget sources**) are required to provide one CO₂ allowance for each ton of CO₂ emitted during the preceding three-year control period. A **CO₂ allowance** represents a limited authorization to emit one ton of CO₂, as issued by a respective participating state.
- Each **RGGI control period** is three years in length. The first control period began on January 1, 2009, and extends through December 31, 2011.

Introduction

What is CO₂ Budget Source (RGGI) Compliance?

- **Role of RGGI COATS:**

The **RGGI CO₂ Allowance Tracking System (RGGI COATS)** is where compliance transactions will occur, and is used by each RGGI participating state's environmental regulatory agency to determine compliance with each state's CO₂ Budget Trading Program.

- **Current CO₂ Budget Sources:**

For a list of current CO₂ budget sources please see the Sources Report by clicking the “Sources” hyperlink on the RGGI COATS home page: www.rggi-coats.org.

Key Terms - Compliance

- **CO₂ Budget Source:** A fossil fuel-fired power plant 25 MWe or greater in size regulated under the RGGI program.
- **CO₂ Compliance Obligation:** Total tons of CO₂ emitted during the first control period by a CO₂ budget source, less eligible biomass deductions (as determined by each state).
- **Draft True-Up:** The process run by a CO₂ budget source in RGGI COATS which compares the CO₂ Compliance Obligation to the sum of the CO₂ allowances surrendered and those remaining in the Compliance Account. Draft true-up must be run by 11:59 PM ET on March 1, 2012.

***Note:** Terms may differ between this presentation, RGGI COATS, and state CO₂ Budget Trading Programs. If you have any questions on terminology please contact your state (contact information can be found at the end of this presentation).*

Key Terms - Compliance

- **Automatic Deduction of CO₂ Allowances:** The process by which first control period CO₂ allowances (the amount as determined by the relevant state) held in a CO₂ budget source's Compliance Account are transferred for compliance to the relevant state's Surrender Account in RGGI COATS on June 2, 2012 in an order defined in each state's CO₂ Budget Trading Program.
- **Surrendering of CO₂ Allowances:** The *optional* process by which a CO₂ budget source may identify specific first control period CO₂ allowances to be used for compliance by transferring them to the relevant state's Surrender Account in RGGI COATS by using the Compliance Deduction transaction in RGGI COATS (available from January 31, 2012 through March 1, 2012).

***Note:** Terms may differ between this presentation, RGGI COATS, and state CO₂ Budget Trading Programs. If you have any questions on terminology please contact your state (contact information can be found at the end of this presentation).*

Key Terms – RGGI COATS

- **Authorized Account Representative (AAR):** For a CO₂ budget source and each CO₂ budget unit at the source (for a Compliance Account), the natural person who is authorized by the owners and operators of the source and all CO₂ budget units at the source to represent and legally bind each owner and operator in matters pertaining to the CO₂ Budget Trading Program; or, for a General Account, the natural person who is authorized to transfer or otherwise dispose of CO₂ allowances held in the General Account.
- **Alternate Authorized Account Representative (AAAR):** A person who may act on behalf of the AAR.
- **Electronic Submission Agent (Agent):** A person designated by an AAR or AAAR to act in the RGGI COATS system on their behalf.

4 Stages of CO₂ Budget Source Compliance

Stage 1: CO₂ Emissions Reporting

(CO₂ Budget Sources)

Stage 2: Compliance Activities in RGGI COATS:

a) Acquire & Provide CO₂ Allowances for Compliance;

b) Run Draft True-Up; and

c) Certify Compliance

(CO₂ Budget Sources)

Stage 3: Compliance Evaluation

(RGGI Participating States)

Stage 4: Public Reporting

(Public)

4 Stages of CO₂ Budget Source Compliance

Stage 1: CO₂ Emissions Reporting (*CO₂ Budget Sources*)

- **Reporting to the U.S. EPA:**
 - CO₂ budget sources are required to report **quarterly CO₂ emissions data** to RGGI participating states through the U.S. Environmental Protection Agency's (U.S. EPA's) Clean Air Markets Division (CAMD) Business System (CBS) in accordance with state CO₂ Budget Trading Program regulations and U.S. EPA regulations at 40 CFR Part 75.
 - Updates made in the CAMD Business System flow to RGGI COATS periodically.

4 Stages of CO₂ Budget Source Compliance

Stage 1: CO₂ Emissions Reporting

- **Key Dates:**

- **Q4-2011 (October 1–December 31, 2011):** Final quarter of the first RGGI control period.
- **January 30, 2012:** Deadline to submit CO₂ emissions data to U.S. EPA for Q4-2011.

- For more information on U.S. EPA's emissions reporting requirements, see: <http://camddataandmaps.epa.gov/gdm/>.

4 Stages of CO₂ Budget Source Compliance

Stage 2: Compliance Activities in RGGI COATS

(CO₂ Budget Sources)

- a) Acquire & Provide CO₂ Allowances for Compliance
- b) Run Draft True-Up
- c) Certify Compliance

4 Stages of CO₂ Budget Source Compliance

Stage 2: Compliance Activities in RGGI COATS

a) **Acquire & Provide CO₂ Allowances for Compliance**

Market participants can **acquire CO₂ allowances** in two ways:

- 1) CO₂ Allowance Auctions:** Auction 14, held on December 7, 2011 is the last quarterly CO₂ Allowance Auction to purchase CO₂ allowances before the end of the first control period. For more information on CO₂ Allowance Auctions, see: http://www.rggi.org/market/co2_auctions.
- 2) Secondary Markets:** CO₂ allowances for the first control period can be acquired through secondary markets. All CO₂ allowances for the first control period must be provided for compliance by 11:59 PM ET on March 1, 2012.

*Note: It is strongly recommended that you obtain all CO₂ allowances necessary for compliance **well before** the Allowance Transfer Deadline.*

4 Stages of CO₂ Budget Source Compliance

Stage 2: Compliance Activities in RGGI COATS

a) Acquire & Provide CO₂ Allowances for Compliance

- **Provide CO₂ Allowances for Compliance:** CO₂ budget sources must transfer and hold sufficient first control period CO₂ allowances in their Compliance Account (not including any CO₂ allowances surrendered) to meet their CO₂ Compliance Obligation in RGGI COATS by **11:59 PM ET on March 1, 2012.**
- A CO₂ budget source may also optionally identify specific CO₂ allowances to be used for compliance (or “**surrender**” CO₂ allowances) by using the Compliance Deduction Transaction in RGGI COATS **between January 31, 2012 and March 1, 2012.**

4 Stages of CO₂ Budget Source Compliance

Stage 2: Compliance Activities in RGGI COATS

b) Run Draft True-Up

- CO₂ budget sources must run draft true-up in RGGI COATS by 11:59 PM ET on March 1, 2012.

c) Certify Compliance

- CO₂ budget sources are also required to certify compliance between January 31, 2012 and March 1, 2012 according to each state's CO₂ Budget Trading Program.

Additional information on how to run draft true-up and certify compliance in RGGI COATS will be discussed further in this presentation.

4 Stages of CO₂ Budget Source Compliance

Stage 3: Compliance Evaluation *(RGGI Participating States)*

- **State Compliance Evaluation Period (March 2, 2012 - June 1, 2012):** RGGI participating states will evaluate each CO₂ budget source by reviewing the Compliance Certification Report and comparing the number of first control period CO₂ allowances provided for compliance (**including any CO₂ allowances surrendered and held in Compliance Accounts**) to the CO₂ Compliance Obligation. During this time:
 - **First Control Period CO₂ Allowances in RGGI COATS Compliance Accounts will be frozen.** You will not be able to transfer or receive first control period CO₂ allowances in your Compliance Account.
 - **Second Control Period CO₂ Allowances, and any CO₂ Allowances in RGGI COATS General Accounts WILL NOT be frozen.** To receive or transfer first control period CO₂ allowances during this time, you are strongly encouraged to make sure you have access to a General Account. For more information on how to open a General Account, please see the RGGI COATS User's Guide: https://rggi-coats.org/eats/rggi/image/help/_rggi/RGGIGettingStartedGuide.pdf.

4 Stages of CO₂ Budget Source Compliance

Stage 3: Compliance Evaluation

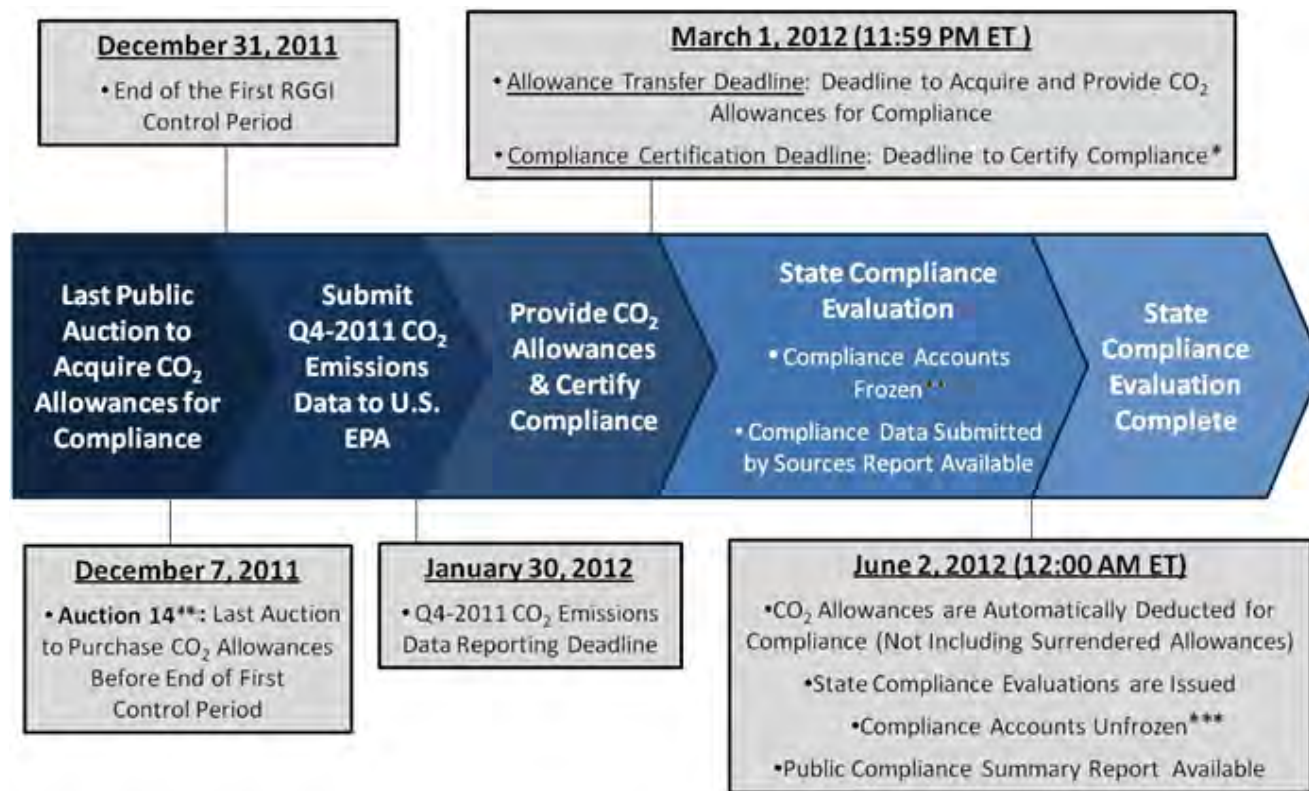
- **Following the completion of state compliance evaluation processes, on June 2, 2012:**
 - First control period CO₂ allowances will be **automatically deducted** from Compliance Accounts for compliance in accordance with the rules specified in each state's CO₂ Budget Trading Program;
 - State-derived evaluations of compliance will be released publicly in the **Compliance Summary Report**; and
 - **First Control Period CO₂ Allowances in Compliance Accounts will be unfrozen** in RGGI COATS, unless there is any shortfall of allowances to meet the CO₂ Compliance Obligation after final true-up. If there is a shortfall of CO₂ allowances to meet the CO₂ compliance obligation after compliance deductions are complete, the CO₂ budget source may not be able to transfer any CO₂ allowances out of their compliance account until excess emissions are resolved.

4 Stages of CO₂ Budget Source Compliance

Stage 4: Public Reporting (*Public*)

- **There will be two public compliance data reports:**
 - **Source-Submitted Compliance Report (March 2–June 1, 2012):**
This report will be publicly available in RGGI COATS and will show data submitted by CO₂ budget sources. ***This report will not include any state-derived evaluations of compliance.*** A static form of this report will be available on the RGGI website on June 2, 2012.
 - **The Compliance Summary Report (June 2, 2012):**
This report will replace the Source-Submitted Compliance Report in RGGI COATS, and ***will include state-derived compliance evaluations of compliance.***
- **To view public reports in RGGI COATS:**
Go to www.rggi-coats.org and click on the desired report category in the "Public Reports" section. No login is required.

Compliance Timeline & Milestones



*Certification may include an electronic and/or paper compliance certification process as defined by each state's CO₂ Budget Trading Rule. Paper compliance certification materials, if required, must be received by the relevant state no later than 5:00 PM ET on March 1, 2012 and electronic compliance certification, if required, must be submitted into RGGI COATS no later than 11:59 PM ET on March 1, 2012. For more information see: <http://www.rggi.org/market/tracking/compliance>.

**For more information on CO₂ Allowance Auctions, please see: http://www.rggi.org/market/co2_auctions

***Note: Only first control period CO₂ allowances will be frozen between March 2, 2012 and June 1, 2012. On June 2, 2012, first control period CO₂ allowances in RGGI COATS Compliance Accounts will be unfrozen, unless there is any shortfall of allowances to meet the CO₂ Compliance Obligation after final true-up. If there is a shortfall of CO₂ allowances to meet the CO₂ compliance obligation after deductions are complete, the CO₂ budget source may not be able to transfer any CO₂ allowances out of their compliance account until excess emissions are resolved. For more information, please see each state's CO₂ Budget Trading Program regulations.

CO₂ Budget Source Compliance Process Checklist: 8 Steps

Compliance Process Checklist: 8 Steps

- Step 1:** Confirm your access to U.S. EPA's CAMD Business System (CBS)
- Step 2:** Confirm your user registration in RGGI COATS
- Step 3:** *(Recommended)* Have a General Account open in RGGI COATS
- Step 4:** Acquire sufficient first control period CO₂ allowances to meet your CO₂ Compliance Obligation through:
 - CO₂ Allowance Auctions (Auction 14 to be held December 7, 2011); and/or
 - Secondary Markets (by March 1, 2012)
- Step 5:** Submit your CO₂ emissions data to the U.S. EPA by January 30, 2012
- Step 6:** Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)
- Step 7:** Run Draft True-Up in RGGI COATS by March 1, 2012
- Step 8:** Certify Compliance by the Compliance Certification Deadline (Between January 31 - March 1, 2012)

Compliance Process Checklist: 8 Steps

- ❑ **Step 1: Confirm your access to the U.S. EPA's CAMD Business System (CBS)**
- **Facility information including AARs, AAARs, owners, operators, and facilities is stored and maintained in the U.S. EPA's CAMD Business System, and reflected in RGGI COATS.**
 - Please ensure you have an AAR and AAAR (if applicable) with access to the CAMD Business System, and that all information about your facility is up-to-date. Updates made in the CAMD system will flow through to RGGI COATS periodically.
 - Note: If you need to change your AAR or make changes that cannot be made in the CAMD system, this may take additional time and require paper forms to be sent to the EPA and your regulatory state. *Please plan accordingly.*
 - See <http://www.epa.gov/airmarkt/business/industry/cbs.html> for more information about the CAMD Business System.

Compliance Process Checklist: 8 Steps

❑ **Step 2: Confirm your user registration in RGGI COATS**

- **RGGI COATS stores and maintains RGGI accounts and CO₂ allowances, and is the vehicle in which compliance transactions and evaluation will be made.**
 - Please ensure that your facility's AAR, AAAR (if applicable), and any Agents (if applicable) for RGGI COATS are current and have access to RGGI COATS. Please note that AAR, AAAR, and facility data is managed in the EPA CAMD Business System, not RGGI COATS. Agents and General Accounts are maintained in RGGI COATS.
 - If you cannot make changes to your RGGI COATS account information (e.g. the existing AAR has left the company), and/or need to create a new user in RGGI COATS, this process will take time and may require the submission of paper documents. *Please plan accordingly.*
 - For more information, please see the RGGI COATS User's Guide: https://rggi-coats.org/eats/rggi/image/help/_rggi/RGGIGettingStartedGuide.pdf.

Compliance Process Checklist: 8 Steps

- ❑ **Step 3: (Recommended) Have a General Account open in RGGI COATS**
 - During the compliance evaluation process (March 2, 2012 – June 1, 2012), **first control period CO₂ allowances in RGGI COATS Compliance Accounts will be frozen** and CO₂ budget sources will not be able to transfer or receive first control period CO₂ allowances in their Compliance Account (but will be able to transfer and receive second control period CO₂ allowances, or any allowances held in General Accounts).
 - If you anticipate receiving or transferring first control period CO₂ allowances in RGGI COATS during this time, you are strongly encouraged to open and maintain a General Account. For more information on how to open a General Account, please see the RGGI COATS User's Guide: https://rggi-coats.org/eats/rggi/image/help/_rggi/RGGIGettingStartedGuide.pdf.

Compliance Process Checklist: 8 Steps

- ❑ **Step 4: Acquire sufficient first control period CO₂ allowances to meet your CO₂ Compliance Obligation**
- **CO₂ allowances can be obtained in two ways:**
 - **CO₂ Allowance Auctions:** Auction 14, to be held on December 7, 2011 is the final CO₂ Allowance Auction to purchase CO₂ allowances before the end of the first control period. The Auction 14 Notice will be released no later than 8:00 AM ET on October 11, 2011. For more information on CO₂ Allowance Auctions, please see: http://www.rggi.org/market/co2_auctions.
 - **Secondary Markets:** CO₂ allowances for the first control period can also be obtained through the secondary markets. All CO₂ allowances must be provided for compliance by 11:59 PM ET on March 1, 2012.

Note: *It is strongly recommended that you obtain all CO₂ allowances necessary for compliance **well before** the Allowance Transfer Deadline.*

Compliance Process Checklist: 8 Steps

❑ Step 5: Submit your CO₂ emissions data to the U.S. EPA by January 30, 2012

- Emissions for the final quarter of the first control period (**Q4-2011**) must be submitted to U.S. EPA's CAMD Business System **by January 30, 2012**.
 - For more information on U.S. EPA's emissions reporting requirements, please see the U.S. EPA CAMD website at:
<http://camddataandmaps.epa.gov/gdm/>.
 - For more information on state CO₂ Budget Trading Programs, please see:
<http://www.rggi.org/design/regulations>.

Note: CO₂ emissions data updates for the first control period will flow to RGGI COATS from the CAMD Business System through June 1, 2012. If there are any changes to CO₂ emissions data, the relevant state, AAR and any AAAR and/or Agent(s) associated to the Compliance Account will be notified via RGGI COATS. Any data adjustments and potential effects on a CO₂ budget source's CO₂ Compliance Obligation will be reviewed by the relevant state.

Compliance Process Checklist: 8 Steps

- ❑ **Step 6: Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)**
- All CO₂ budget sources must hold sufficient first control period CO₂ allowances in their Compliance Account (not including any CO₂ allowances surrendered) to meet their CO₂ Compliance Obligation in RGGI COATS by **11:59 PM ET on March 1, 2012**.
- Please note the CO₂ Compliance Obligation will take into account any emissions data updates that may occur after March 1, 2012. Therefore, you should consider the potential for such updates when determining how many CO₂ allowances to hold in your Compliance Account for compliance.

Compliance Process Checklist: 8 Steps

- ❑ **Step 6: Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)**
- **Automatic Deduction of CO₂ allowances:** On June 2, 2012, first control period CO₂ allowances (the amount to be determined by each state) will be **automatically deducted** from each CO₂ budget source's Compliance Account.
 - In general, CO₂ allowances will be deducted **in order of increasing serial number**, but some **exceptions apply** according to state CO₂ Budget Trading Programs, as discussed on the **following screens**.
 - For more information, see each state's CO₂ Budget Trading Program regulations: <http://www.rggi.org/design/regulations>.

Compliance Process Checklist: 8 Steps

- ❑ **Step 6: Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)**
- Exceptions to the rule of automatic deductions by increasing serial number:
 - 1) **For CO₂ budget sources located in DE, NH, NJ, NY, RI or VT:** CO₂ allowances will be deducted in chronological order (CO₂ allowances from earlier allocation years will be deducted before CO₂ allowances of later allocation years), in order of increasing serial number for each year.

Compliance Process Checklist: 8 Steps

- ❑ **Step 6: Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)**
- Exceptions to the rule of automatic deductions by increasing serial number:
 - 2) **For CO₂ budget sources located in CT, ME, MD, or MA:** CO₂ allowances that were allocated to units at the source will be deducted before other CO₂ allowances, in order of increasing serial number. CO₂ allowances that were allocated to units at the source include:
 - Early Reduction Allowances from the states of Connecticut and Massachusetts;
 - CO₂ allowances allocated from the state of Connecticut's Customer-side Distributed Resources (CDR) Set-aside Account, Combined Heat and Power (CHP) Useful Thermal Energy Set-aside Account, or CHP Long-term PPA Set-aside Account;
 - CO₂ allowances allocated from the state of Maryland's Long Term Contract Set-aside Account or Clean Generation Set-aside Account; and
 - CO₂ allowances allocated from the state of Maine's Integrated Manufacturing Facility (IMF) Account.

Compliance Process Checklist: 8 Steps

- ❑ **Step 6: Provide sufficient first control period CO₂ allowances in a RGGI COATS Compliance Account for compliance by the Allowance Transfer Deadline (March 1, 2012)**
- ***(OPTIONAL) Surrendering of CO₂ Allowances:*** If you wish to identify specific first control period CO₂ allowances to use for compliance, you may do so by using the Compliance Deduction Transaction in RGGI COATS **between January 31, 2012 and March 1, 2012.**
 - Any identified first control period CO₂ allowances will be transferred from your Compliance Account to your relevant state's Surrender Account for compliance at the point of the transaction.
 - Any remaining balance of first control period CO₂ allowances to meet your CO₂ Compliance Obligation (as determined by your state) will be **automatically deducted** pursuant to the regulations of the state in which the CO₂ budget source resides (see previous slides).
 - For additional information on RGGI COATS transactions, see the RGGI COATS User's Guide.

Compliance Process Checklist: 8 Steps

Step 7: Run Draft True-Up in RGGI COATS by March 1, 2012

- CO₂ budget sources must **run draft true-up in RGGI COATS by 11:59 PM ET on March 1, 2012**, which will compare their CO₂ Compliance Obligation to the sum of first control period CO₂ allowances surrendered and held in the Compliance Account for automatic deduction at the time that the last draft true-up is run.
- CO₂ budget sources may run draft true-up in RGGI COATS as many times as needed.
- Final compliance evaluations by states will be released on June 2, 2012 in the Compliance Summary Report in RGGI COATS.

Compliance Process Checklist: 8 Steps

❑ Step 8: Certify Compliance by the Compliance Certification Deadline (Between January 31 - March 1, 2012)

- CO₂ budget sources are required to submit a Compliance Certification Report certifying that they are in compliance according to their state's CO₂ Budget Trading Program. This may include an **electronic certification (submitted by the AAR/AAAR in RGGI COATS by 11:59 PM ET on March 1, 2012)** and/or **paper certification** process as required by each state (all paper materials, if required, must be received by 5:00 PM ET on March 1, 2012).
 - **Electronic compliance certification** is submitted by the AAR or AAAR only through RGGI COATS and will be available January 31, 2012. If required, electronic certification must be submitted by 11:59 PM ET on March 1, 2012.
 - If a **paper compliance certification** report is required, it must be printed from RGGI COATS by the AAR or AAAR (available January 31, 2012) and received by the relevant state contact no later than 5:00 PM ET on March 1, 2012.
 - Please follow the guidelines on the next screen for the Compliance Certification process of the state in which your facility resides.

Compliance Process Checklist: 8 Steps

Step 8: Certify Compliance by the Compliance Certification Deadline (Between January 31 - March 1, 2012)

- **State Compliance Electronic/Paper Certification Processes:**
- **For CO₂ budget sources located in Maine, Massachusetts, New Hampshire New Jersey, New York, or Rhode Island:** Compliance must be certified electronically, and any relevant attachments must be uploaded into RGGI COATS by 11:59 PM ET on March 1, 2012. A paper copy is not required.
- **For CO₂ budget sources located in Delaware or Vermont:** Compliance must be certified electronically in RGGI COATS by 11:59 PM ET on March 1, 2012, and a paper copy of the electronic Compliance Certification Report must also be printed from RGGI COATS, signed and sent with any attachments to the relevant state agency. All paper materials must be received by the relevant state no later than 5:00 PM ET on March 1, 2012.
- **For CO₂ budget sources located in Connecticut or Maryland:** CO₂ budget sources must print, sign and send a paper copy of the electronic Compliance Certification Report from RGGI COATS and any attachments to the relevant state agency. All paper materials must be received by the relevant state no later than 5:00 PM ET on March 1, 2012. Electronic certification may also be submitted but is not required.

All paper compliance certification materials must be received by 5:00 PM ET on March 1, 2012 , and electronic compliance certification materials must be received by 11:59 PM ET on March 1, 2012. The Compliance Certification Report can only be accessed by the AAR and AAAR. State mailing addresses can be found on the next screen. Additional details on how to certify compliance in RGGI COATS will be provided in this presentation. See the RGGI COATS User's Guide for more information.



Compliance in RGGI COATS: A How-To Guide

□ Step 8: Certify Compliance by the Compliance Certification Deadline

State	Electronic Certification Required?	Paper Certification Required?	State Mailing Address:
CT	No	Yes	CT DEP Attn: Mike LaFleur, CO ₂ Budget Trading Program 79 Elm Street Hartford, CT 06106-5127 Email: Michael.LaFleur@ct.gov
DE	Yes	Yes	DNREC – DAQ Attn. Babatunde Asere/RGGI 655 South Bay Road Suite 5N Dover, DE 19901 Email: Babatunde.Asere@state.de.us
ME	Yes	No	N/A
MD	No	Yes	Maryland Department of the Environment Attn: Ariane Kouamou-Nouba Air and Radiation Management Administration Air Quality Compliance Program 1800 Washington Boulevard Baltimore MD 21230 Email: akouamou-nouba@mde.state.md.us
MA	Yes	No	N/A
NH	Yes	No	N/A
NJ	Yes	No	N/A
NY	Yes	No	N/A
RI	Yes	No	N/A
VT	Yes	Yes	Vermont Air Pollution Control Division Attn: Doug Elliott 103 South Main Street, Bldg. 3 South Waterbury, VT 05671-0402 Email: Doug.Elliott@state.vt.us

Compliance in RGGI COATS: A How-To Guide

Compliance in RGGI COATS: A How-To Guide

Step 1: How to Determine Your Total CO₂ Compliance Obligation

Step 2: How to Provide CO₂ Allowances for Compliance:

- How to Transfer CO₂ Allowances to Your Compliance Account
- (*OPTIONAL*) How to Surrender Allowances

Step 3: How to Conduct a Draft Compliance Assessment
(Draft True-Up)

Step 4: How to Certify Compliance

Step 5: How to View Compliance Reports

Note: *Screen shots serve as examples only and do not represent any real RGGI COATS data or accounts. Screen shots may not represent exact screens in RGGI COATS. Please see the RGGI COATS User's Guide for additional information.*

Compliance in RGGI COATS: A How-To Guide

Step 1: How to Determine Your Total CO₂ Compliance Obligation

1. In RGGI COATS (www.rggi-coats.org), click on the **Emissions** link in the menu navigation bar. This will bring you to the **Emissions page**, which displays all sources (units) with which you have been associated as an AAR, AAAR, or Electronic Submission Agent (Agent).



Compliance in RGGI COATS: A How-To Guide

Step 1: How to Determine Your Total CO₂ Compliance Obligation

2. You can choose to view your emissions Quarterly, Annually, or for the Control Period (Note: Only the Control Period view is shown below).

Emissions - Control Period View

Use this page and the views below the grid to verify CO₂ emissions data for the affected RGGI sources and units for which you serve as an AAR, AAAR or agent. Clicking on the hyperlinked quarter in the Quarter column (see: Quarterly view) navigates one to the Emissions Record Detail page, which displays the data associated with the unit for the selected quarter, as well as any Quarterly Emissions Record documents related to Eligible Biomass. The column: Eligible Biomass (Tons)(State Value) contains the deduction to be applied, if any, for the combustion of eligible biomass.

Use the filter criteria to find a specific source or unit.

Filter Criteria ▼

Control Period

State

Source Name

ORIS Code

State Identifier

Unit

State	ORIS Code	Source Name	State Identifier	Unit ID	Control Period	Op Hours	Heat Input (mmBtu)	CO2 Mass (Tons)	Eligible Biomass (Tons) (EPA Value)	Eligible Biomass (Tons) (State Value)
NJ	10308	North Jersey Energy Associates	18072	1001	01/01/2009 - 12/31/2011	11,921.42	13,476,441	793,214	554,642	554,642
NJ	10308	North Jersey Energy Associates	18072	1002	01/01/2009 - 12/31/2011	11,944.27	13,364,720	793,145	338,876	338,876
NY	10621	WPS Syracuse Generation, LLC	7313200035	1	01/01/2009 - 12/31/2011	2,301.85	1,209,288	72,186	16,435	17,457
NY	7869	Glenwood Landing Energy Center	1282402146	UGT012	01/01/2009 - 12/31/2011	2,823.85	1,057,109	82,755	33,060	33,060
NY	7869	Glenwood Landing Energy Center	1282402146	UGT013	01/01/2009 - 12/31/2011	3,227.55	1,220,185	72,679	42,218	42,218

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Show Control Period Data

Show Annual Data

Show Quarterly Data

Click the Export Data button to download the grid as a .csv file to your local drive.

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Provide CO₂ Allowances for Compliance

- **Transferring CO₂ Allowances to your Compliance Account:**
 - All CO₂ budget sources must transfer sufficient first control period CO₂ allowances to their Compliance Account to meet their CO₂ Compliance Obligation in RGGI COATS **by 11:59 PM ET on March 1, 2012.**
- **Surrendering CO₂ Allowances to your State's Surrender Account (Optional):**
 - As an *optional* step, if you wish to identify specific CO₂ allowances to use for compliance, you may do so by using the Compliance Deduction Transaction in RGGI COATS **between January 31, 2012 and March 1, 2012.**

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

- The **Allowance Transfer Transaction** in RGGI COATS:
 - Allows you to transfer CO₂ allowances to your Compliance Account.
 - Allows you to select CO₂ allowances to transfer either manually or automatically by CO₂ allowance serial number.

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

- **To transfer CO₂ allowances to your Compliance Account:**
 1. In RGGI COATS, click on the **Transfer Allowances** sub-menu under the Allowance Transactions menu.

The screenshot displays the RGGI CO₂ Allowance Tracking System interface. At the top, the user name 'MEGAN REILLY' is visible along with navigation links: 'My Profile', 'Contact Us', 'Home', and 'Log Out'. The main header reads 'RGGI CO₂ ALLOWANCE TRACKING SYSTEM'. Below this is a secondary header 'RGGI CO₂ BUDGET TRADING PROGRAMS'. A navigation bar contains several menu items: 'Accounts', 'Sources', 'Special Approvals', 'Offset Projects', 'Allowance Transactions', 'Reports', and 'Reference'. Under 'Allowance Transactions', the 'Transfer Allowances' sub-menu is highlighted. A red arrow points from a text box on the left to this sub-menu. The text box contains the instruction: 'Click on Transfer Allowances to move CO₂ allowances between accounts (general and compliance)'. Below the navigation bar, there are three content boxes. The middle box contains a brief description of the RGGI initiative, and the right box contains a welcome message and a link to read more.

MEGAN REILLY : My Profile : Contact Us : Home : Log Out

RGGI CO₂ ALLOWANCE TRACKING SYSTEM

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts Sources Special Approvals Offset Projects **Allowance Transactions** Reports Reference

Transfer Allowances

Click on Transfer Allowances to move CO₂ allowances between accounts (general and compliance).

The Regional Greenhouse Gas Initiative (RGGI) is a cooperative effort by participating states to reduce emissions of carbon dioxide (CO₂), a greenhouse gas that causes climate change.

Announcements
Welcome to RGGI COATS

Welcome to RGGI COATS, the electronic system for tracking allowances under... [read](#)

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

2. **Select the Transferring Account** from which you will transfer CO₂ allowances.

Accounts Sources Special Approvals Offset Projects Allowance Transactions Reports Reference Help

Transfer Allowances: Step 1 - Select Transferring Account

Use filter criteria to find a specific transferring account.

Filter Criteria ▾

Representative Name

Account Number

Account Name

Filter Clear

Click the radio button to select a transferring account and view the Allowance Holdings available in that account.

Account Number	Account Name	Authorized Account Representative	State	Allowances can be Transferred
<input checked="" type="radio"/> CT10788	ABC Source Compliance Account	Reilly, Megan	CT	Yes
<input type="radio"/> GN10787	ABC Manufacturing General Account	Reilly, Megan	All States	Yes

1 - 2 of 2

Allowance Holdings

Allocation Year	Type	Originating State	Serial Range	Date Acquired	Frozen	Quantity
2008	Standard	NY	1185174 - 1185183	09/03/2008	No	10
2008	Long Term Contract	NY	1188862 - 1188864	09/03/2008	No	3

Total Allowances Available: 13

Next

View the Allowance Holding grid for details on the allowances held in the account, including the Total Allowances Available in the lower right hand corner.

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

3. Select the Acquiring Account which will receive the CO₂ allowances.

RGGI CO₂ ALLOWANCE TRACKING SYSTEM

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts | Sources | Special Approvals | Offset Projects | Allowance Transactions | Reports | Reference [Help](#)

Transfer Allowances: Step 2 - Select Acquiring Account

Use filter criteria to find a specific acquiring account.

Review that the correct Transferring Account has been selected in the previous step. Click the Back button to go back to Step 1 – Select Transferring Account.

Filter Criteria ▾

Representative Name

Account Number

Account Name

Allowances to be Transferred From

Account Number	CT10788
Account Name	ABC Source Compliance Account
State	CT

Account Number	Account Name	Authorized Account Representative	State	Allowances can be Acquired
<input checked="" type="radio"/> CT10722	New CT Source Compliance Account	Allen, John	CT	Yes

1 - 1 of 1

Click the radio button to select an acquiring account.

Compliance in RGGI COATS: A How-To Guide

Step 2 (Automatic Selection): How to Transfer CO₂ Allowances to your Compliance Account

4a. Select Allowances to Transfer: Automatic Selection Method. By choosing “Automatic Selection”, RGGI COATS will automatically select the CO₂ allowances to be transferred based on the allocation year(s) and serial number.

Transfer Allowances: Step 3 - Select Allowances to Transfer

Allowances to be Transferred From

Account Number	CT10788
Account Name	ABC Source Compliance Account
State	CT

Allowances to be Transferred To

Account Number	CT10722
Account Name	New CT Source Compliance Account
State	CT

Choose Selection Method: **Automatic** ← Automatic Selection

Available Allowances

Allocation Year	Allowance Type	Originating State	Serial Range	Allowance(s)	Frozen	Date Acquired
2008	Standard	NY	1185174-1185183	10	No	08/28/2008
2008	Long Term Contract	NY	1188862-1188864	3	No	08/28/2008

Amount to Transfer: ← Enter the quantity of allowances.

Select Allocation Year(s) *
 ← Select the Allocation Year of the allowances COATS will select from the Available Allowances grid.

Deduction Method
 Begin with last acquired Begin with first acquired ← Choose deduction method.

← After entering the above criteria and clicking Calculate, COATS will automatically select the allowance serial numbers to transfer.

Allowances to be Transferred

Allowance Year	Allowance Type	Serial Range	Originating State	Date Acquired	Allowance(s)
2008	Standard	1185174-1185177	NY	08/28/2008	4

Compliance in RGGI COATS: A How-To Guide

Step 2 (Manual Selection): How to Transfer CO₂ Allowances to your Compliance Account

4b. Select Allowances to Transfer: Serial Selection Method. As an alternative to the automatic selection method (described in the previous slide), you may select CO₂ allowances to transfer by specifying the serial number range.

Accounts Sources Special Approvals Offset Projects Allowance Transactions Reports Reference Help

Transfer Allowances: Step 3 - Select Allowances to Transfer

Allowances to be Transferred From

Account Number CT10788
Account Name ABC Source Compliance Account
State CT

Allowances to be Transferred To

Account Number CT10722
Account Name New CT Source Compliance Account
State CT

Choose Selection Method: Serial Number selection

Use the Select All checkbox if all allowances held in the Transferring Account will be transferred. Select All

Allocation Year	Type	Originating State	Serial Range	Beginning Serial Number	Ending Serial Number	Frozen	Quantity	
<input checked="" type="checkbox"/>	2008	Standard	NY	1185174-1185183	1185174	1185183	No	10
<input type="checkbox"/>	2008	Long Term Contract	NY	1188862-1188864	1188862	1188864	No	

Back Next

Total to be Transferred 10

Check the serial block of allowances you would like to transfer from the Transferring Account to the Acquiring Account.

If not all allowances in the block will be transferred, change the Beginning or Ending Serial Number to correspond to the total quantity of allowances you would like to transfer.

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

5. Review and approve the transaction

Transfer Allowances: Step 4 - Review and Approve Transaction

Allowances to be Transferred From

Account Number: CT10708
Account Name: ABC Source Compliance Account
State: CT
Authorized Account Representative: Reilly, Megan

Allowances to be Transferred To

Account Number: CT10722
Account Name: New CT Source Compliance Account
State: CT
Authorized Account Representative: Allen, John

Allowances to be Transferred

Allocation Year	Type	Originating State	Serial Range	Date Acquired	Quantity
2008	Standard	NY	1185174-1185177	08/28/2008	4

Total to be Transferred: 4

The CO₂ allowance transfer must include the date of the completion of the last sale or purchase transaction for the CO₂ allowance, if any, and the sale or purchase price of the CO₂ allowance that is the subject of a sale or purchase transaction. The "last sale or purchase transaction" is the financial transaction associated with the current allowance transfer. Note that the last sale or purchase transaction may occur before the associated transfer is completed in COATS, and that COATS will automatically record today's date as the date for the transaction if you do not report a date for an associated sale or purchase transaction.

If the CO₂ allowance transfer is the result of a settlement on a futures exchange, the exchange settlement box below should be checked and the sale or purchase transaction price reported to COATS should be consistent with the payment instructions to the respective layer clearing number for the full contract value based upon the expiration day's settlement price in a means and manner prescribed by the clearing service provider.

Click the Submit button to finalize the allowance transfer.

Transaction Date

09/23/2008

Price per allowance of associated sale or purchase transaction (\$)

4.68

Check here if there is no associated sale or purchase transaction

Check here if an exchange settlement transaction

Comment

Click the "Check here if an exchange settlement transaction" checkbox if the transaction is the result of a settlement on a futures exchange.

Challenge Question

Challenge Answer

In what city or town did your mother and father meet?

I am authorized to make this submission on behalf of the owners and operators of the CO₂ budget sources or CO₂ budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or creating required statements and information, including the possibility of fine or imprisonment.

Enter your COATS Password as your electronic signature to indicate that you agree to the terms of the certification statement.

Enter password

Back Submit

Click the Submit button to complete the transaction.

Use the Back button to navigate back to make a change.

If the allowance transfer is a sale or purchase transaction, then "Price per Allowance of Associated Sale or Purchase Transaction (\$)" field must be completed. If it is not, the "Check here if there is no associated sale or purchase transaction" checkbox must be clicked.

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Transfer CO₂ Allowances to your Compliance Account

6. **Confirmation of Allowance Transaction.** We recommend that you print the page for your records. Check your email for a system-generated confirmation of the allowance transfer.

Transfer Allowances: Confirmation of Allowance Transaction [Print](#) [Help](#)

Print this page using the Print button for your records.

Your allowance transfer has been completed. Please print this page for your records. Email confirmation regarding this transaction will be forwarded shortly.

Recorded Date	09/23/2008
Transaction Date	09/23/2008
Transaction ID	rggi11136
Transaction Status	Complete
State	CT
Price per allowance of sale or purchase transaction (\$)	4.68

Check your email inbox for a system-generated email confirmation of the transaction.

Allowances Transferred From		Allowances Transferred To	
Account Number	CT10788	Account Number	CT10722
Account Name	ABC Source Compliance Account	Account Name	New CT Source Compliance Account
State	CT	State	CT
Authorized Account Representative	Rilly, Megan	Authorized Account Representative	Allen, John

Allowances Transferred

Allocation Year	Type	Originating State	Serial Range	Quantity
2008	Standard	NY	1185174-1185177	4

Total Allowances Transferred 4

Transaction Status History

Date	Transaction Status
09/23/2008	Complete

Compliance in RGGI COATS: A How-To Guide

Step 2 - *Optional*: How to Surrender CO₂ Allowances to Your State's Surrender Account

- The **Compliance Deduction Transaction** in RGGI COATS:
 - Is **OPTIONAL** (you are only required to transfer sufficient CO₂ allowances to your Compliance Account).
 - Will be available in RGGI COATS from **January 31 - March 1, 2012**.
 - Will transfer selected first control period CO₂ allowances for surrender from your Compliance Account to your state's Surrender Account for compliance.
 - Allows you to select CO₂ allowances to surrender either automatically or manually by CO₂ allowance serial number.

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional: How to Surrender CO₂ Allowances to Your State's Surrender Account

- **To conduct a Compliance Deduction Transaction, follow these steps:**
 1. You must already have transferred CO₂ allowances to your Compliance Account (as described in previous slides).
 2. Log into RGGI COATS and click on the **Compliance Deduction** Sub-menu under the **Allowance Transactions** Menu.

The screenshot displays the RGGI CO₂ Allowance Tracking System interface. At the top, the title "RGGI CO₂ ALLOWANCE TRACKING SYSTEM" is visible. Below it, a navigation bar contains several menu items: "Accounts", "Sources", "Special Approvals", "Emissions", "Compliance", "Allowance Transactions", "Reports", and "Reference". The "Allowance Transactions" menu is expanded, showing sub-options: "Transfer Allowances" and "Compliance Deduction". A red arrow points from a text annotation to the "Compliance Deduction" sub-menu item. The text annotation reads: "Click on the Compliance Deduction sub-menu to surrender allowances". Below the navigation bar, there is a section titled "RGGI CO₂ BUDGET TRADING PROGRAMS" with a sub-section "Announcements" containing the text: "The Regional Greenhouse Gas Initiative (RGGI) is a cooperative effort by participating states to reduce".

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional: How to Surrender CO₂ Allowances to Your State's Surrender Account

3. Select the Transferring Account from which you will transfer CO₂ allowances.

Surrender Allowances: Step 1 – Select Surrendering Account

Surrendering allowances permanently withdraws COATS allowances from compliance or overdraft accounts for the purpose of compliance.

Compliance Deduction will be locked down/not accessible until after last emissions reporting deadline for the Control Period (01/30/2012).

Use the filter criteria to find a specific transferring account

Filter Criteria ▾

Representative Name

Account Number

Account Name

Use the radio button to select a transferring account and view the Allowance Holdings available in that account.

Account Number	Account Name	Authorized Account Representative	State	Allowances can be Transferred
<input type="radio"/> CT10722	AES Thames Compliance Account	Allen, John	CT	Yes
<input type="radio"/> CT10766	Bridgeport Energy Compliance Account	Reilly, Megan	CT	Yes
<input type="radio"/> CT10774	Milford Power Company Compliance Account	Reilly, Megan	CT	Yes
<input type="radio"/> CT10788	Norwalk Harbor Station Compliance Account	Reilly, Megan	CT	Yes
<input checked="" type="radio"/> CT10790	Wallingford Energy Compliance Account	Garvin, Phil	CT	Yes
<input type="radio"/> CT10791	New Haven Harbor Compliance Account	Dawson, Joe	CT	Yes

1 - 100 of 165

Allowance Holdings

Allocation Year	Type	Originating State	Serial Range	Date Acquired	Frozen	Quantity
2009	Standard	CT	2073878 - 2073900	01/13/2009	No	23

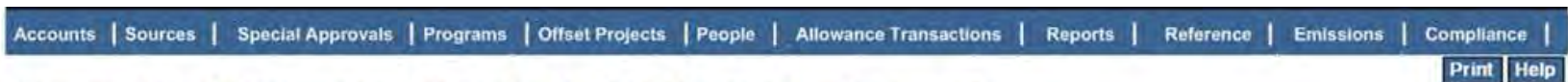
Total Allowances Available: 23

View the Allowance Holdings grid for details on the allowances held in the account, including the Total Allowances Available in the lower right hand corner.

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional: How to Surrender CO₂ Allowances to Your State's Surrender Account

4. **Select the Surrender Account** which will receive the transferred CO₂ allowances (e.g. a Surrender Account for the regulating state)



Surrender Allowances: Step 2 - Select Surrender Account

Filter Criteria ▼	
Authorized Account Representative	<input type="text"/>
Account Number	<input type="text"/>
Account Name	<input type="text"/>
<input type="button" value="Filter"/>	<input type="button" value="Clear"/>

Allowances to be Surrendered From

Account Number	CT10790
Account Name	Wallingford Energy Compliance Account
State	CT

	Account Number	Account Name	Authorized Account Representative	State	Allowances can be Acquired
<input checked="" type="radio"/>	CT10101	Connecticut Control Period 1 Surrender Account		CT	Yes

Use the radio button to select the Surrender Account. Only the Surrender Account associated with the state in which the Compliance Account selected in Step 1 is located will appear in the grid for selection.

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional (Automatic Selection): How to Surrender CO₂ Allowances to Your State's Surrender Account

4a. Select Allowances to Surrender – Automatic Selection Method

Print Help

Surrender Allowances: Step 3 – Select Allowances to Surrender

Allowances to be Surrendered From

Account Number CT10790
Account Name Wallingford Energy Compliance Account
State CT

Allowances to be Surrendered To

Account Number CT10101
Account Name Connecticut Control Period 1 Surrender Account
State CT

Available Allowances Choose Selection Method: **Automatic** Select All

Allocation Year	Allowance Type	Originating State	Serial Range	Allowance(s)	Frozen	Date Acquired
2009	Standard	CT	2073878 - 2073900	23	No	01/13/2009

Amount to Transfer **Enter the quantity of allowances.**

Select Allocation Year(s) * **Select the Allocation Year of the allowances COATS will select from the Available Allowances grid.**

Deduction Method Begin with last acquired Begin with first acquired **Choose deduction method.**

After entering the above criteria and clicking Calculate, COATS will automatically select the allowance serial numbers to transfer.

Allowances to be Surrendered

Originating State	Allowance Year	Allowance Type	Serial Range	Date Acquired	Allowance(s)
CT	2009	Standard	2073897 - 2073900	01/13/2009	4

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional (Manual Selection): How to Surrender CO₂ Allowances to Your State's Surrender Account

- 4b. **Select Allowances to Surrender – Manual Selection Method.** As an alternative to the automatic selection method (described on the previous slide), you may manually select CO₂ allowances to transfer by specifying the serial number range and selecting the receiving account.

MEGAN REILLY : My Profile : Contact Us : Home : Log Out

RGGI CO₂ ALLOWANCE TRACKING SYSTEM

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts Sources Special Approvals Programs Offset Projects People Allowance Transactions Reports Reference

Print Help

Surrender Allowances: Step 3 - Select Allowances to Surrender

Allowances to be Surrendered From

Account Number CT10790
Account Name Wallingford Energy Compliance Account
State CT

Allowances to be Surrendered To

Account Number CT10101
Account Name Connecticut Control Period 1 Surrender Account
State CT

Choose Selection Method: Serial Select All

Allocation Year	Type	Originating State	Serial Range	Beginning Serial Number	Ending Serial Number	Frozen	Quantity	
<input checked="" type="checkbox"/>	2009	Standard	CT	2073878 - 2073900	2073878	2073900	No	23

Back Next

Total to be Transferred 23

Check the selection box corresponding with the allowances that you would like to transfer from the transfer Account to the Surrender Account.

If not all allowances in the block will be surrendered, change the Beginning or Ending Serial Number to reflect the total quantity of allowances you would like to transfer.

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional: How to Surrender CO₂ Allowances to Your State's Surrender Account

5. Review and approve the transaction.

Accounts | Sources | Special Approvals | Offset Projects | Allowance Transactions | Reports | Reference | Help

Surrender Allowances: Step 4 - Review and Approve Transaction

Allowances to be Surrendered From

Account Number	CT10790
Account Name	Wallingford Energy Compliance Account
State	CT
Authorized Account Representative	Santos, Carol

Allowances to be Surrendered To

Account Number	CT10880
Account Name	Control Period 1 Surrender Account
State	CT

Allowances to be Surrendered

Allocation Year	Type	Originating State	Serial Range	Date Acquired	Quantity
2009	Standard	CT	2073897-2073900	01/13/2009	4

Total Allowances to be Surrendered 4

Please review the transaction. Click the Submit button to finalize the surrender.

Transaction Date:

Comment:

Challenge Question: In what city or town did your mother and father meet?

Challenge Answer:

I am authorized to make this submission on behalf of the owners and operators of the CO₂ budget sources or CO₂ budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Password: ← Enter RGGI COATS password.

Note that the transaction date may occur before the associated transfer is completed in RGGI COATS, and that RGGI COATS will automatically record today's date as the date for the transaction if you do not report a date for the transaction. The current system date is also recorded as the Recorded Date for the transaction.

Compliance in RGGI COATS: A How-To Guide

Step 2 - Optional: How to Surrender CO₂ Allowances to Your State's Surrender Account

- Confirmation of Allowance Transaction.** We recommend that you click the Print button in the top right corner to print the page for your records. Check your email inbox for a system-generated confirmation of the allowance transfer.

Surrender Allowances: Confirmation of Surrender Transaction [Print](#) [Help](#)

Your allowance surrender has been completed. Please print this page for your records. Email confirmation regarding this transaction will be forwarded shortly.

Check your email for a system-generated email confirmation of the transaction *Print this page button using the Print button for your records.*

Date of Allowance Surrender	02/12/2012
Transaction Date	02/12/2012
Transaction ID	rgg2232
Transaction Status	Complete
State	CT

Allowances to be Surrendered From	
Account Number	CT10790
Account Name	Wallingford Energy Compliance Account
State	CT
Authorized Account Representative	Garvin, Phil

Allowances to be Surrendered To	
Account Number	CT10101
Account Name	Connecticut Control Period 1 Surrender Account
State	CT

Allowances Transferred

Allowance Year	Allowance Type	Serial Range	Allowance(s)
2009	Standard	2073897 - 2073900	4

Total Allowances to be Surrendered 4

Transaction Status History

Date	Transaction Status
02/12/2012	Complete

[Continue](#) *Click the Continue button to proceed to the Allowance Transactions page.*

Compliance in RGGI COATS: A How-To Guide

Step 2: How to Provide CO₂ Allowances for Compliance

- **Consideration for NJ CO₂ Allowances Purchased at a Fixed Price:**
 - Any NJ CO₂ allowances purchased at a fixed price that remain in the Compliance Account following the deduction of CO₂ allowances for compliance will be assigned to the NJ Consumer Benefit Account (see N.J.A.C. 7:27C-5.4(h)), and will not be able to be used for subsequent control periods (i.e., use or lose).
 - It is therefore advised to surrender these CO₂ allowances (by using the manual selection method for the Compliance Deduction Transaction in RGGI COATS) for compliance for the first control period.
- **Consideration for CT CO₂ Allowances Purchased at a Fixed Price:**
 - Any CT CO₂ allowances purchased at a fixed price (e.g. through Long-Term Power Purchase Agreements) can only be used for compliance by the source who purchased those CO₂ allowances. Do not transfer, sell, or purchase CT CO₂ allowances that were purchased at a fixed price.

Compliance in RGGI COATS: A How-To Guide

Step 3: How to Conduct a Draft Compliance Assessment (Draft True-Up)

1. **View the Compliance Homepage by clicking the Compliance Tab.** This displays the state(s) (in which you have a Compliance Account) by control period currently available for true-up processing, as indicated by the "Open" Status in the grid.

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts Sources Special Approvals Emissions **Compliance** Allowance Transactions Reports Reference Help

Compliance

The control periods by state available below are those with which you have a compliance account. In order to Process True-Up (perform a draft compliance assessment), select a control period in the grid via radio button and click the Process True-Up button.

Use the filter criteria to find a specific state.

Filter Criteria ▾
State ▾
Filter Clear

Select a state from the grid via radio button.

	State	Status	Compliance Begin Date	Compliance End Date
<input checked="" type="radio"/>	CT	Open	01/01/2009	12/31/2011

1 - 1 of 1
Process True-Up

Click the Process True-Up button once you have selected a state and are ready to proceed to the Select Sources For Processing True-Up page.

The Open Status indicates that the state is available for true-up processing.

RGGI Inc.
RGGI Inc. is a nonprofit corporation created to provide technical and administrative services to the Regional Greenhouse Gas

Compliance in RGGI COATS: A How-To Guide

Step 3: How to Conduct a Draft Compliance Assessment (Draft True-Up)

- 2. Select Sources for True-Up Processing.** This page displays the sources for which you are affiliated as an AAR, AAAR, or Agent and the results of the last draft (or final) true-up processing performed.

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts Sources Special Approvals Offset Projects Emissions Compliance Allowance Transactions Public Reports Reference [Help](#)

Select Sources for True-Up Processing for Carbon Dioxide (CO₂) 01/01/2009 - 12/31/2011

[Processing Log](#)

Use the filter criteria to find a specific source.

Filter Criteria ▼

Source Name

ORIS Code

State Identifier

Authorized Account Representative

Processing Status

[Filter](#) [Clear](#)

Select the source to process true-up for via the checkbox.

Select All

ORIS Code	Source Name	State Identifier	Authorized Account Representative	CO ₂ Compliance Obligation	Account Holdings	Last Update	Processing Status	Certified?	Paragraph 3 Document	Paragraph 5 Document
<input checked="" type="checkbox"/> 6237	AES Greenridge Compliance Account	135-115 14-312-01	Winne, Mark	3,493	0	02/10/2012	Source-Submitted - Emissions > Allowances	No		

[Back](#) [Process True-Up](#) [Export Data](#)

Click the Process True-Up button once you have selected a source and are ready to proceed to the Compliance Processing Page.

Compliance in RGGI COATS: A How-To Guide

Step 3: How to Conduct a Draft Compliance Assessment (Draft True-Up)

3. **Compliance Processing.** This page displays the results of the current draft true-up processing based on previously surrendered CO₂ allowances and CO₂ allowances held in the Compliance Account at the time of processing.

RGGI CO₂ BUDGET TRADING PROGRAMS

Accounts | Sources | Special Approvals | Offset Projects | People | Emissions | Allowance Transactions | Programs | Compliance | Public Reports | Reference

Print | Help

Compliance Processing

Processing Complete.

The processing box displays the unit by unit processing statuses for the source(s) selected, including any warning messages.

AES Greenridge - Unit C-3 Compliance: Success
AES Greenridge - Unit C-3 Compliance: Warning: Compliance cannot be finalized for this unit until a compliance certification has been received.
AES Greenridge - Unit C-3 Compliance: Warning: Emissions have not been reported for every period of the compliance period

Account Name	Account Number	ORIS Code	Unit ID(s)	Total CO ₂ Emissions	Biomass Emissions Deducted	CO ₂ Compliance Obligation	AAR Surrendered Allowances	Default Deductions	Total Allowances Deducted	Status	Result
AES Greenridge Compliance Account	CT10769	6237	A-1, B-2, C-3	3,515	22	3,493	229	3,264	3,493	Complete	Source-Submitted - Emissions = Allowances

[Return to Grid](#) | [Certify Compliance](#)

Click this button to navigate to the Compliance Certification Report page.

The Results column will display "Source-Submitted - Emissions = Allowances" if the draft true-up was successful. If not, it will display one of the following messages: "Source-Submitted - Emissions > Allowances", "No Emissions Reported", "Did Not Operate", or "Account Closed - Not Processed".

Compliance in RGGI COATS: A How-To Guide

Step 4: How to Certify Compliance

- CO₂ budget sources are required to submit a Compliance Certification Report certifying that they are in compliance with their state's CO₂ Budget Trading Program **between January 31, 2012 and March 1, 2012**. This report can only be accessed by the AAR or AAAR of the CO₂ budget source in RGGI COATS and contains specific attestations according to each state's CO₂ Budget Trading Program.
- Compliance certification may include an electronic certification and/or paper certification process as required by each state:
 - **Electronic compliance certification** must be submitted through RGGI COATS by the AAR or AAAR no later than 11:59 PM ET on March 1, 2012.
 - If a **paper compliance certification** report is required, it must be printed by the AAR/AAAR from RGGI COATS and submitted to the relevant state contact. All paper materials must be received by the relevant state no later than 5:00 PM ET on March 1, 2012.

Compliance in RGGI COATS: A How-To Guide

Step 4: How to Certify Compliance

- **To certify compliance (both electronic and paper), the AAR or AAAR must follow these steps:**
 1. **Navigate to the Compliance Certification Report Page** by clicking on the **Certify Compliance** button after running draft true-up. Note: Agents will not be able to access this button, only AARs or AAARs.

The **Compliance Certification Report Page** is the electronic Compliance Certification Report for a source and any units at the source that are subject to a CO₂ budget emissions limitation in a control period.

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Step 4: How to Certify Compliance

2. **To submit electronic certification (as required by your state)** on the Compliance Certification Report Page, you may electronically upload any relevant attachments, read the Certification statement, type your RGGI COATS password and click the "**Submit**" button. Note: paper requirements for states must be received by the relevant state no later than 5:00 PM ET on March 1, 2012, and electronic submission must be submitted no later than 11:59 PM ET on March 1, 2012:
 - **For CO₂ budget sources located in CT or MD**, the Certification Report must be printed from RGGI COATS, signed, and sent with any attachments to your relevant state. The report can be printed before or after clicking "Submit".
 - **For CO₂ budget sources located in DE or VT**, you must click "Submit" and then you will need to print, sign, and send a copy of the report with any attachments to your relevant state agency.
 - **For CO₂ budget sources located in all other states**, you must click "Submit" and certify compliance electronically.

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Step 4: How to Certify Compliance

- 3. Read-only Compliance Certification Report.** If electronic certification is submitted (after uploading any necessary documents, entering your password, and clicking the Submit button on the Compliance Certification screen) in RGGI COATS, you will be navigated to a read-only version of the Compliance Certification Report. A print button will be available in the top right-hand corner of the page.

Note: *It is recommended that you print a copy of the completed Compliance Certification Report for your records.*

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Step 5: How to View Compliance Reports

There will be 2 public compliance data reports in RGGI COATS:

- 1. Source-Submitted Compliance Report:** Displays the data submitted by CO₂ budget sources upon the Allowance Transfer Deadline and Compliance Certification Deadline.
 - **Does NOT include state-derived evaluations on compliance.**
 - Will be available to the public between March 2, 2012 through June 1, 2012.
 - On June 2, 2012 a static version of the report will be posted to the RGGI website.
- 2. Compliance Summary Report:** Displays final compliance data as submitted by the CO₂ budget sources and evaluated by states.
 - **Includes state-derived evaluations on compliance.**
 - Will be available to the public starting on June 2, 2012.

Compliance in RGGI COATS: A How-To Guide

Step 5: How to View Compliance Reports

- Go to the RGGI COATS website (www.rggi-coats.org), and click on the desired report category in the "Public Reports" section of the screen. No login is required.

The screenshot displays the RGGI CO₂ Allowance Tracking System website. The header includes "RGGI CO₂ ALLOWANCE TRACKING SYSTEM" and "RGGI CO₂ BUDGET TRADING PROGRAMS". Navigation links for "Reference" and "Home" are present. A descriptive paragraph states: "The RGGI CO₂ Allowance Tracking System (RGGI COATS) is the platform that records and tracks data for each state's CO₂ Budget Trading Program." The main content is divided into two columns. The left column, titled "Public Reports", lists various report categories: "Special Approvals", "Offset Projects", "Accounts", "Account Representatives", "Sources", "Owner/Operator", "Transaction Price Report", "Quarterly Emissions", "Annual Emissions", "Control Period Emissions", "Summary Level Emissions", and "Compliance Summary Report", which is circled in red. The right column, titled "RGGI COATS Accounts", provides information for registered users, including a login form with a "Username" field and a "Login" button. It also includes links for "Register to use RGGI COATS" and "Forgot your RGGI COATS username?".

Online Q&A Session



Live Q&A Session

- **To ask a question during the webinar:**
 - Send your question via “**Chat**” to the presenters on your webinar screen.

- **To ask a question after the webinar:**
 - If you have additional questions following the webinar, you can email them to Katie Ho at RGGI, Inc. (katie.ho@rggi.org).

Additional Resources

- **State CO₂ Budget Trading Programs:**

- The compliance process for RGGI CO₂ budget sources is governed by the applicable of the state in which the facility is located. For more information, see <http://www.rggi.org/design/regulations>.

- **RGGI Website:**

- Additional information related to compliance can be found at: <http://www.rggi.org/market/tracking/compliance>.

- **RGGI COATS:**

- RGGI COATS can be accessed at: www.rggi-coats.org.
- For more information, see the RGGI COATS User's Guide at: https://rggi-coats.org/eats/rggi/image/help/_rggi/RGGIGettingStartedGuide.pdf.
- Visit the RGGI website at: <http://www.rggi.org/market/tracking>.

- **U.S. EPA's Emissions Reporting Requirements:**

- See the U.S. EPA CAMD website at <http://camddataandmaps.epa.gov/gdm/>.

Contacts

- **COATS System Administrator:** For questions related to RGGI COATS, please email rggi-coats@sra.com.
- **RGGI Participating States:** For other questions related to compliance, please contact the relevant state contact person below.

State	Contact Person	Email	Phone
CT	Mike LaFleur	Michael.LaFleur@ct.gov	(860) 424-3462
DE	Babatunde Asere	Babatunde.Asere@state.de.us	(302) 323-4542
ME	Eric Kennedy	Eric.Kennedy@maine.gov	(207) 287-5412
MD	Ariane Kouamou-Nouba	akouamou-nouba@mde.state.md.us	(410) 537-4225
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NH	Joe Fontaine	joseph.fontaine@des.nh.gov	(603) 271-6794
NJ	Steven Jenks	Steven.Jenks@dep.state.nj.us	(609) 292-1923
NY	Mike Sheehan	mpsheeha@gw.dec.state.ny.us	(518) 402-8396
RI	Frank Stevenson	frank.stevenson@dem.ri.gov	(401) 222-2808 x7021
VT	Doug Elliott	Doug.Elliott@state.vt.us	(802) 241-3845

Thank You

A recording of this presentation will be made
available on the RGGI website at:

<http://www.rggi.org/market/tracking/compliance>.