

Preparing for CO₂ Budget Source Fifth Control Period Compliance

October 12, 2023

Webinar Outline

- Introduction
- Key Terms
- 4 Stages of RGGI Compliance
- Compliance Timeline & Milestones
- Compliance Process Checklist: 8 Steps
- Compliance in RGGI COATS: Demonstration
- Question & Answer
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Introduction

What is RGGI CO₂ Budget Source 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 short ton of CO₂, as issued by a RGGI state.
- Each RGGI control period is three years in length. The fifth control period began on January 1, 2021 and extends through December 31, 2023.
 - Starting in 2015, each CO2 budget source must hold allowances equal to 50 percent of its emissions during each Interim Control Period (the first two calendar years of each three-year control period).
 - Each CO2 budget source must hold allowances equal to 100 percent of its emissions for the three-year control period at the end of the control period.

Introduction

What is RGGI CO₂ Budget Source Compliance?

- The RGGI CO₂ Allowance Tracking System (COATS) is where compliance transactions occur and is used by each RGGI state to determine compliance with each state's CO₂ Budget Trading Program.
- For a list of current CO₂ budget sources, please see the Sources Report on the COATS home page: <u>rggi-coats.org</u>.

Key Terms

Note that terms may differ between this presentation, COATS, and state CO_2 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).

- CO₂ Budget Source: A fossil fuel-fired power plant 25 MW* or greater in size regulated under RGGI.
- CO₂ Compliance Obligation: Total tons of CO2 emitted during the fifth control period by a CO2 budget source, less any eligible emissions deductions (as determined by each state).
- **Draft True-Up:** The process in COATS which compares the CO_2 Compliance Obligation to the sum of any CO_2 allowances already surrendered and those remaining in the compliance account. (Draft true-up must be run by 11:59 PM ET on March 1, 2024.)

^{*} New York applicability requirements are 15 MW or greater. See state statutes and regulations for more information.

Key Terms

 Allowance Transfer Deadline: Midnight of March 1 occurring after the end of the control period or, if that March 1 is not a business day, midnight of the first business day thereafter.

- Automatic Deduction of CO₂ Allowances: The process by which 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 COATS upon final compliance true-up. Final compliance true-up will occur on April 2, 2024.
- Surrendering of CO₂ Allowances: The optional process by which a CO₂ budget source may identify specific CO₂ allowances to be used for compliance by transferring them to the relevant state's surrender account in COATS by using the Compliance Deduction Transaction in COATS (available from January 31, 2024 through March 1, 2024).

Key Terms

- Authorized Account Representative (AAR): For a compliance account (i.e., CO₂ budget source and each CO₂ budget unit at the source), the 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 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 COATS on their behalf.
- Reviewer: A person designated by an AAR or AAAR to review information in COATS on their behalf.

- **Stage 1: CO₂ Emissions Reporting** (CO₂ Budget Sources)
- **Stage 2: Compliance Activities in COATS:** (CO₂ Budget Sources)
 - Provide CO₂ allowances for compliance
 - Run draft true-up
 - Certify compliance
- **Stage 3: Compliance Evaluation** (RGGI States)
- **Stage 4: Public Reporting** (Public)

Stage 1: CO₂ Emissions Reporting

- Reporting to the US EPA
 - CO₂ budget sources are required to report quarterly CO₂ emissions data to RGGI states through the US Environmental Protection Agency's (US EPA) Clean Air Markets Division (CAMD) Business System in accordance with state CO₂ Budget Trading Program regulations and US EPA regulations at 40 CFR Part 75.
 - Updates made in the CAMD Business System flow to COATS periodically.
 - January 30, 2024: Deadline to submit CO₂ emissions data to the US EPA for Q4-2023, the final quarter of the fifth control period.
 - For more information on the US EPA's emissions reporting requirements, see: https://www.epa.gov/airmarkets.

Stage 2: Compliance Activities in COATS

- a) Provide CO₂ allowances for compliance
 - CO₂ allowances must be provided for compliance by the allowance transfer deadline (11:59 PM ET on March 1, 2024).
 - It is recommended that you obtain all CO₂ allowances necessary for compliance well before the allowance transfer deadline.
 - Market participants can acquire CO₂ allowances in two ways:
 - **1) CO₂ Allowance Auctions:** Auction 62, to be held on December 6, 2023 is the last quarterly CO₂ Allowance Auction to purchase CO₂ allowances before the end of the fifth control period.
 - Auction notice will be released on October 10
 - The deadline to apply for Auction 62 is October 25.
 - For more information on RGGI CO₂ allowance auctions, see: https://www.rggi.org/auctions/auction-materials.
 - **2)** Secondary Markets: CO₂ allowances for can also be acquired through the secondary market.

Stage 2: Compliance Activities in COATS

a) Provide CO₂ allowances for compliance

- CO₂ budget sources must transfer and hold sufficient CO₂ allowances in their compliance account (not including any CO₂ allowances already surrendered) to meet their CO₂ compliance obligation in COATS by 11:59 PM ET on March 1, 2024.
- 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 COATS between January 31, 2024 and March 1, 2024.

Stage 2: Compliance Activities in COATS

b) Run draft true-up

CO₂ budget sources must run draft true-up in COATS by 11:59
 PM ET on March 1, 2024.

c) Certify compliance

 CO₂ budget sources are also required to certify compliance between January 31, 2024 and March 1, 2024 according to each state's CO₂ Budget Trading Program (e.g., electronic vs. paper submission).

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

Stage 3: Compliance Evaluation

- State Compliance Evaluation Period (March 2, 2024 April 1, 2024): RGGI states will evaluate each CO₂ budget source by reviewing the Compliance Certification Report and comparing the number of CO₂ allowances provided for compliance (including any CO₂ allowances surrendered and held in compliance accounts) to the CO₂ compliance obligation.
- Final compliance true-up will occur on the first business day following April 1, 2024, which is April 2, 2024. Between March 2, 2024 and final compliance true-up:
 - CO₂ allowances of an allocation year from the fifth control period or prior will be frozen in COATS compliance accounts. You will not be able to transfer or receive allocation year 2009-2023 CO₂ allowances in your compliance account.
 - CO₂ Allowances in COATS general accounts will NOT be frozen. To receive or transfer allocation year 2009-2023 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 COATS User's Guide.

Stage 3: Compliance Evaluation

 Final compliance true-up will occur on the first business day following April 1, 2024, which is April 2, 2024.

Following final compliance true-up on April 2, 2024:

- 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
- Allocation year 2009-2023 CO₂ allowances in compliance accounts will be unfrozen in COATS, unless there is any shortfall of allowances to meet the CO₂ compliance obligation. If there is a shortfall of CO₂ allowances 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.

Stage 4: Public Reporting

- There will be two public compliance data reports:
 - Source-Submitted Compliance Report (March 4, 2024)
 - This report will be publicly available in 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 archived on April 2, 2024 and remain available.
 - Compliance Summary Report (April 2, 2024):
 - This report will replace the Source-Submitted Compliance Report in COATS.
 - This report will include state-derived compliance evaluations of compliance.

To view public reports in COATS: Go to <u>rggi-coats.org</u> and click on the desired report category in the "Public Reports" section. No login is required.

Compliance Timeline & Milestones

December 31, 2023

End of the fifth control period

March 1, 2024 11:59 PM ET

<u>Allowance Transfer Deadline</u>: Provide CO₂ allowances for compliance Compliance Certification Deadline: Certify compliance

Last auction to acquire CO₂ allowances for compliance

Submit Q4-2023 CO₂ emissions data to US EPA CAMD

Provide CO₂ allowances & certify compliance

State Compliance Evaluation

Compliance accounts frozen for allocation year 2009-2023 allowances

Compliance data submitted by sources report available

States
Compliance
Evaluation
complete

December 6, 2023

 Auction 62: Last auction to acquire CO₂ allowances in the fifth control period

January 30, 2024

 Q4-2023 CO₂ emissions data reporting deadline

April 2, 2024

- CO₂ Allowances are deducted for compliance (not including previously surrendered allowances)
 - State Compliance Evaluations determined
 - Compliance accounts unfrozen
 - Compliance Summary Report available

- <u>Step 1</u>: Confirm access to the US EPA's CAMD Business System.
- Step 2: Confirm user registration in COATS.
- ☐ Step 3: (Recommended) Have a general account open in COATS.
- \square **Step 4**: Acquire sufficient CO_2 allowances to meet CO_2 compliance obligation.
- \square Step 5: Submit CO₂ emissions data to the US EPA by January 30, 2024.
- **Step 6**: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 1, 2024).
- ☐ Step 7: Run draft true-up in COATS by March 1, 2024.
- Step 8: Certify compliance by the Compliance Certification Deadline (paper submission received by 5:00 PM ET and electronic submission by 11:59 PM ET on March 1, 2024).

☐ Step 1: Confirm access to the US EPA's CAMD Business System

- Facility information including AARs, AAARs, owners, and operators is stored and maintained in the CAMD system and reflected in COATS.
- Please ensure you have an AAR and AAAR (if applicable) with access to the CAMD system, and that all information about your facility is up-todate. Updates made in the CAMD system will flow through to COATS periodically.
 - Note: If you need to change your AAR or make changes that cannot be made in the CAMD system, this process will take time and may require the submission of paper documents. Please plan accordingly.
 - See https://camd.epa.gov/CBS/login/auth for more information about the CAMD Business System.

☐ Step 2: Confirm user registration in COATS

- COATS stores and maintains RGGI accounts and CO₂ allowances and is where compliance transactions and evaluation are made.
- Please ensure that your facility's AAR, AAAR (if applicable), any Agents (if applicable), and any Reviewers (if applicable) for COATS are current and have access to COATS.
 - Agents, Reviewers, and general accounts are maintained in COATS.
 - Users cannot make changes to compliance account information in COATS; any changes need to be made in the CAMD system.
 - If you cannot make changes to your CAMD system account information (e.g., the existing AAR has left the company), and/or need to create a new user in COATS, this process will take time and may require the submission of paper documents. Please plan accordingly.
 - See the COATS <u>User's Guide</u> for more information about COATS.

☐ Step 3: (Recommended) Have a general account open in COATS

- From March 2, 2024 through final compliance true-up on April 2, 2024,
 CO₂ budget sources will not be able to transfer or receive allocation year
 2009-2023 CO₂ allowances in their compliance account.
- General accounts will be able to transfer and receive CO₂ allowances regardless of allocation year.
- If you anticipate receiving or transferring allocation year 2009-2023 CO₂ allowances in 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 COATS <u>User's Guide</u>.

- ☐ Step 4: Acquire sufficient CO₂ allowances to meet CO₂ compliance obligation
- CO₂ allowances can be obtained in two ways:
 - CO₂ Allowance Auctions
 - Auction 62, to be held on December 6, 2023, is the final RGGI auction to purchase CO₂ allowances before the end of the fifth control period.
 - The Auction 62 Notice will be released on October 10, 2023.
 - For more information on CO₂ Allowance Auctions, please see: https://www.rggi.org/auctions/auction-materials.
 - Secondary Markets
 - CO₂ allowances can also be obtained through the secondary market.
- All CO₂ allowances must be provided for compliance by 11:59 PM ET on March 1, 2024.
 - It is strongly recommended that you obtain all CO₂ allowances necessary for compliance well before the allowance transfer deadline.

- ☐ Step 5: Submit CO₂ emissions data to the US EPA by January 30, 2024
- Emissions for the final quarter of the fifth control period (Q4-2023) must be submitted to US EPA's CAMD Business System by January 30, 2024.
- CO₂ emissions data updates for the fifth control period will continue to flow to COATS from the CAMD system through final compliance true-up.
- If there are any changes to CO₂ emissions data, the relevant state, AAR, and any AAAR, Agent(s), and/or Reviewer(s) associated with the compliance account will be notified via COATS.

- ☐ Step 6: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 1, 2024)
- All CO₂ budget sources must hold sufficient CO₂ allowances in their compliance account (not including any CO₂ allowances previously surrendered) to meet their CO₂ compliance obligation in COATS by 11:59 PM ET on March 1, 2024.
- Please note the CO₂ compliance obligation will reflect any emissions data updates that may occur after March 1, 2024. Therefore, you should consider the potential for such updates when determining how many CO₂ allowances to hold in your compliance account for compliance.
- Deduction of CO₂ Allowances: Following final compliance true-up April 2, 2024, CO₂ allowances will be deducted from each CO₂ budget source's compliance account.

- ☐ Step 6: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 1, 2024)
- Surrendering of CO₂ Allowances (optional): If you wish to identify specific CO₂ allowances to use for compliance, you may do so by using the Compliance Deduction Transaction in COATS between January 31, 2024 and March 1, 2024.
 - Any identified 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 CO₂ allowances to meet your CO₂ compliance obligation will be automatically deducted pursuant to the regulations of the state in which the CO₂ budget source resides.
- For additional information on COATS transactions, see the COATS <u>User's</u> <u>Guide</u>.

☐ Step 7: Run draft true-up in COATS by March 1, 2024

- CO₂ budget sources must run draft true-up in COATS by 11:59 PM ET on March 1, 2024, which will compare their CO₂ compliance obligation to the sum of CO₂ allowances surrendered and/or held in their compliance account.
- CO₂ budget sources may run draft true-up in COATS as many times as needed.
- Final compliance evaluations by states will be released on April 2, 2024 in the Compliance Summary Report in COATS.

- □ Step 8: Certify compliance by the Compliance Certification Deadline (between January 31 March 1, 2024)
- 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 certification may require a paper and/or electronic submission.
- Paper certification must be submitted by the AAR or AAAR by 5:00 PM ET and electronic certification must be submitted by the AAR or AAAR by 11:59 PM ET on March 1, 2024.
 - o For CO₂ budget sources located in Connecticut or Maryland: Paper certification required. Electronic certification may also be submitted but is not required.
 - For CO₂ budget sources located in Delaware, Vermont or Virginia: Electronic and paper certification required.
 - For CO₂ budget sources located in Maine, Massachusetts, New Hampshire, New Jersey, or New York: Electronic certification required.
 - For CO₂ budget sources located in Rhode Island: Electronic or paper certification required.

State	Electronic Certification Required?	Paper Certification Required?	State Mailing Address:
СТ	No	Yes	Supervisor, Compliance Analysis and Coordination Group Engineering and Enforcement Division Bureau of Air Management Department of Energy & Environmental Protection 79 Elm Street, 5 th Floor Hartford, CT 06106
DE	Yes	Yes	DNREC – Division of Air Quality Attn: RGGI 100 West Water Street Dover, DE 19904
ME	Yes	No	N/A
MD	No	Yes	Maryland Department of the Environment Attn: Steve Lang Air and Radiation Administration Air Quality Compliance Program 1800 Washington Boulevard Baltimore, MD 21230
MA	Yes	No	N/A
NH	Yes	No	N/A
NJ	Yes	No	N/A
NY	Yes	No	N/A
RI	Accepted	Accepted	RI Department of Environmental Management Office of Air Resources Attn: Dena Gonsalves 235 Promenade Street Providence, RI 02908-5767
VA	Yes	Yes	Virginia Department of Environmental Quality P.O. Box 1105 Richmond, VA 23218 Attn: Tom Ballou
VT	Yes	∀ę §w.rggi.org	Vermont Agency of Natural Resources Climate Action Office Attn: Brian Woods One National Life Drive – Davis 2 Montpelier, VT 05620-3901

Step 1: How to determine your total CO₂ compliance obligation

Step 2: How to provide CO₂ allowances for compliance

Step 3: How to conduct draft true-up

Step 4: How to certify compliance

Step 5: How to view compliance reports

Note: Screenshots serve as examples only and do not represent any real data or accounts. Screenshots may not represent exact screens in COATS. Please see the COATS <u>User's Guide</u> for additional information.

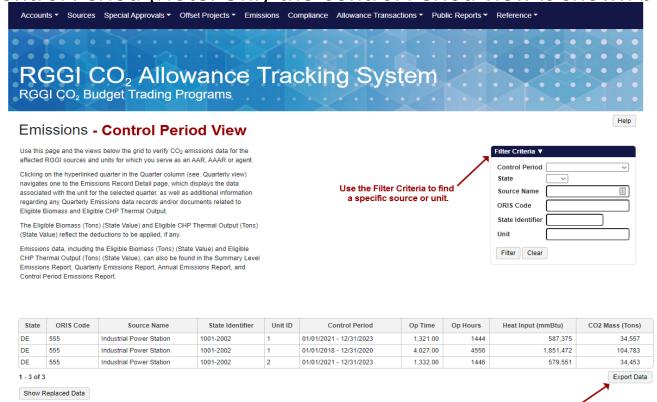
Step 1: How to determine your total CO₂ compliance obligation

1. In COATS (<u>rggi-coats.org</u>), 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, Agent, or Reviewer.



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).



O Show Annual Data

O Show Quarterly Data

Click the Export Data button to

download the grid to your local drive.

Show Control Period Data

Click the radio button to display Control Period data

Step 2: How to provide CO₂ allowances for compliance

- The Allowance Transfer Transaction in COATS:
 - Allows you to transfer CO₂ allowances to your compliance account.
 - Allows you to select CO₂ allowances to transfer either automatically or manually by CO₂ allowance serial block.

rggi.org 32

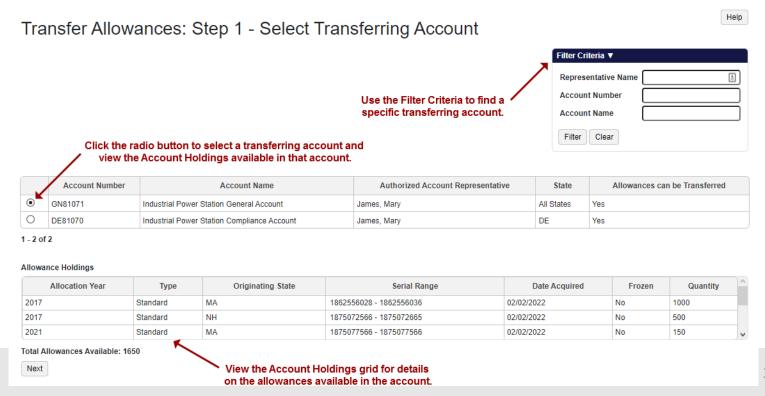
Step 2: How to provide CO₂ allowances for compliance

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



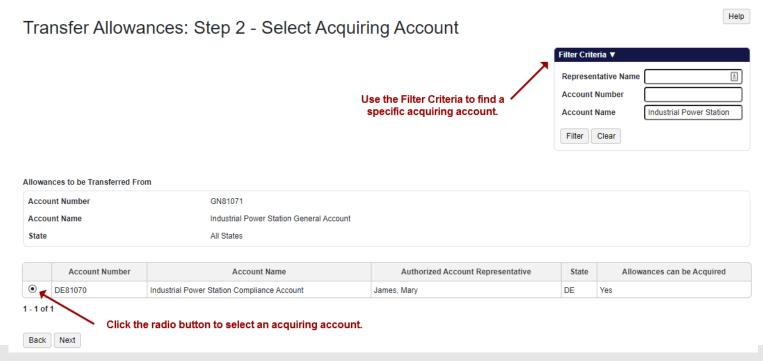
Step 2: How to provide CO₂ allowances for compliance

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



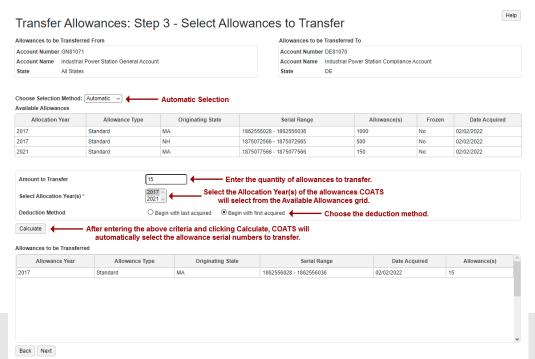
Step 2: How to provide CO₂ allowances for compliance

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



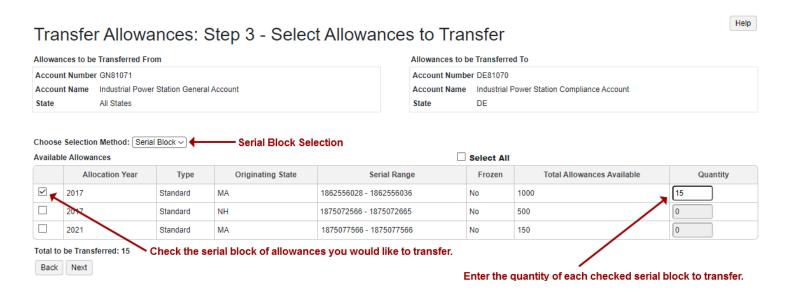
Step 2: How to provide CO₂ allowances for compliance

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



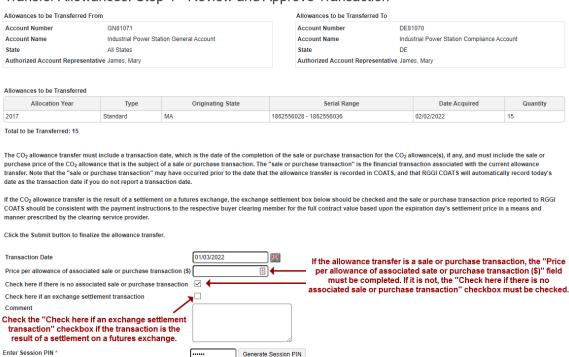
Step 2: How to provide CO₂ allowances for compliance

4b. Select Allowances to Transfer (Serial Block Selection Method): As an alternative to the automatic selection method (described in the previous slide), you may select CO₂ allowances from a specific serial block range.



5. Review and approve the transaction





I am authorized to make this submission on behalf of the persons having an ownership interest with respect to the CO₂ allowances held in the compliance account. 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

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

for obtaining information, I certify that the statements and information are to the

Help

Click the Submit button to complete the transaction

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

Enter your COATS password as your

electronic signature to indicate that you agree

to the terms of the certification statement.

Password

Step 2: How to provide CO₂ allowances for compliance

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

Transter Allowar					Print the page for your recor using the Print button. will be forwarded shortly.	us /	
Recorded Date Fransaction Date Fransaction ID Fransaction Status State Price per allowance of associated Exchange Settlement Transaction	sale or purchase transaction (\$)	02/04/2022 01/03/2022 rggi169736 Complete DE No	Check your email o	email inbox for a confirmation of th	a system-generated le transaction.		
llowances Transferred From			Allowa	ances Transferred To			
Account Number	GN81071		Account Number DE81070		DE81070		
ccount Name	Industrial Power Station Genera	al Account	Account Name Industrial Power Station Compli		ince Account		
tate All States			State DE				
Authorized Account Representative James, Mary			Authorized Account Representative James, Mary				
llowances Transferred							
Allocation Year	Туре		Originating State		Serial Range	Quantity	
017	Standard	MA		1862556028 - 1862	556036	15	
otal Allowances Transferred 15 ransaction Status History	Date			Tra	nsaction Status		
02/04/2022			Complete				

Step 2: How to provide CO₂ allowances for compliance

The **Compliance Deduction Transaction** in COATS:

- Is **optional** (you are only required to transfer sufficient CO₂ allowances to your compliance account).
- Will be available in COATS from January 31 to March 1, 2024.
- Will transfer selected 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 block.

Step 2: How to provide CO₂ allowances for compliance

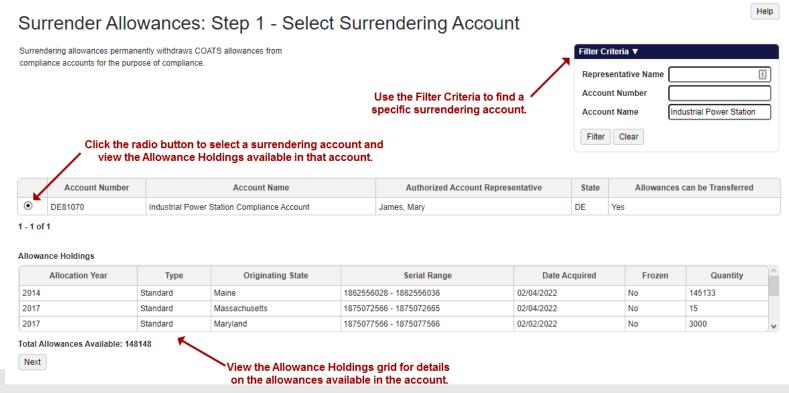
To conduct a Compliance Deduction Transaction:

- 1. You must already have transferred CO₂ allowances to your compliance account (as described in previous slides).
- In COATS, click on the Compliance Deduction sub-menu under the Allowance Transactions Menu.



Step 2: How to provide CO₂ allowances for compliance

Select the Surrendering Account from which you will transfer CO₂ allowances.



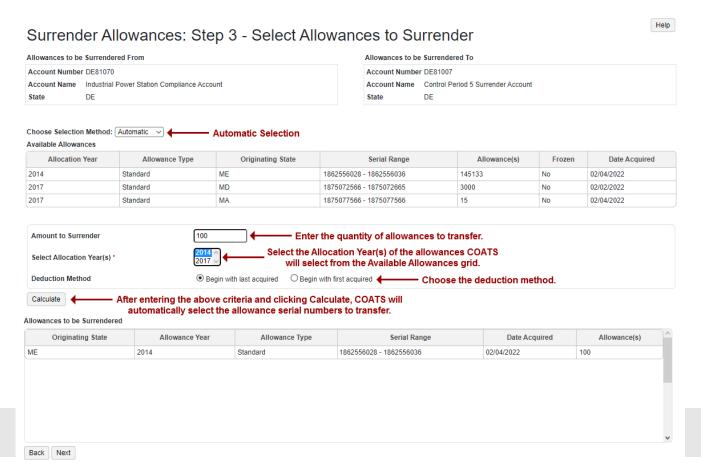
Step 2: How to provide CO₂ allowances for compliance

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

		·	Surrender Account	riteria ▶	
			Timer C	incina >	
llowa	nces to be Surrendered Fro	om			
Account Number		DE81070			
Account Name Industrial Power Station Compliance Account			e Account		
State DE					
	Account Number	Account Name	Authorized Account Representative	State	Allowances can be Acquired
) _	DE81007	Control Period 5 Surrender Account		DE	Yes
	DE10248	Control Period 2 Surrender Account		DE	No
	DE10881	Control Period 1 Surrender Account		DE	No
	DE10955	Control Period 3 Surrender Account		DE	No
	DE80975	Control Period 4 Surrender Account		DE	No

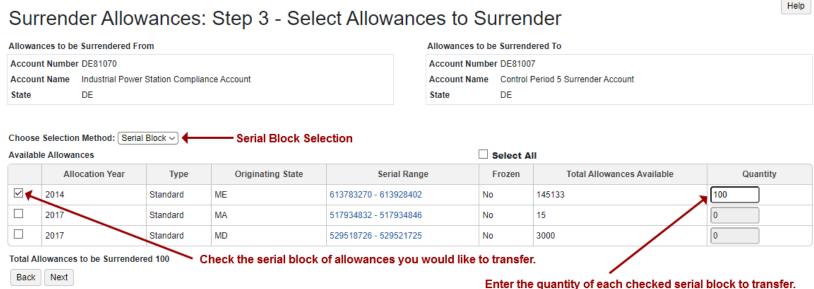
Step 2: How to provide CO₂ allowances for compliance

4a. Select Allowances to Surrender - Automatic Selection Method



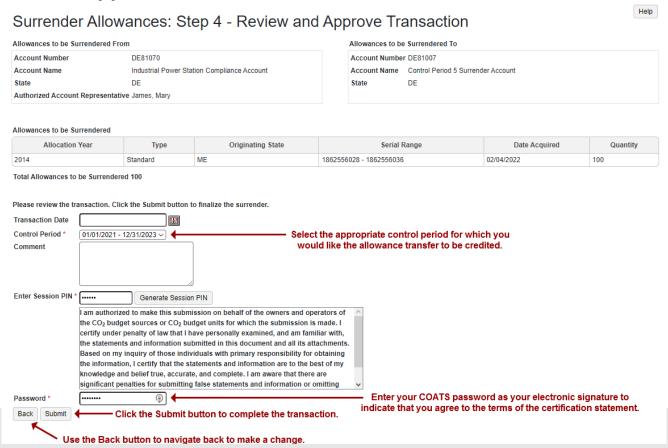
Step 2: How to provide CO₂ allowances for compliance

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 choosing from a specific serial block range and selecting the receiving account.



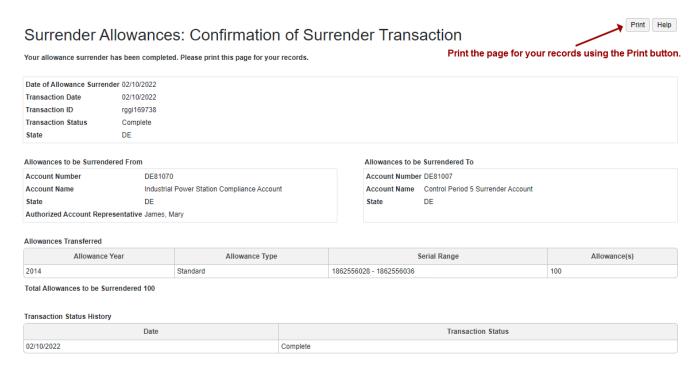
Step 2: How to provide CO₂ allowances for compliance

5. Review and approve the transaction.



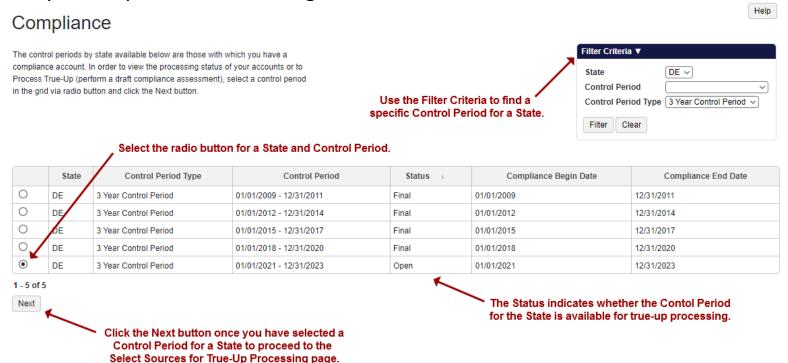
Step 2: How to provide CO₂ allowances for compliance

6. Confirmation of Allowance Transaction. We recommend that you print the page for your records.



Step 3: How to conduct draft true-up

1. View the Compliance Homepage by clicking the Compliance link in the menu navigation bar. 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.



Step 3: How to conduct draft true-up

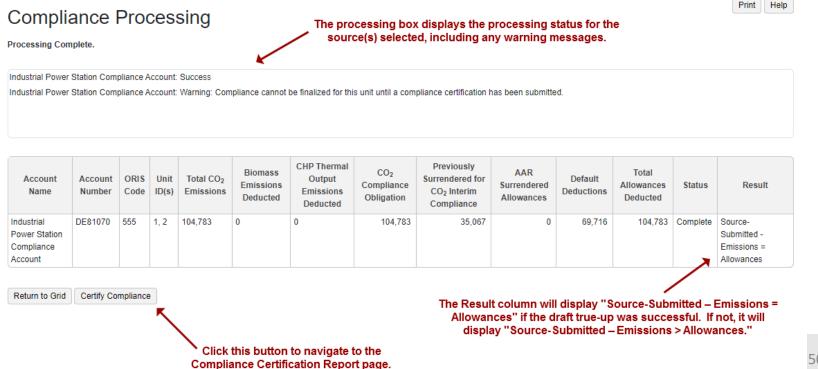
2. Select Sources for True-Up Processing. This page displays the sources for which you are affiliated as an AAR, AAAR, Agent, or Reviewer and the results of the last draft (or final) true-up processing performed.

Select Sources for True-Up Processing for DE 01/01/2021 - 12/31/2023							
To select the source(s) for true-up processing, click the box next to the grid, or check the "Select All" box. Next, click the "Process True which will lead to the "Compliance Processing" page. In order to certify compliance, the AAR or AAAR must select a sing process draft true-up. Electronic Submission Agents may not certiful true-up may be run multiple times. The Last Update column the date true-up was last processed for the source. The "Total Allo Deduction" column displays the sum of allowances surrendered a allowances available for deduction at that time. After processing draft true-up, click on the ORIS Code hyperlink to source's Compliance Account Detail page. The Processing Log hyperlink leads to the Compliance Log page.	e-Up* button, Use the Filter Criter find a specific Sou gle source to fy compliance. in the grid displays wwances Pending nd remaining	ORIS Cod State Iden Authorize Processin Certified?	ame le tifier d Account F ng Status	(Representative ((Industrial Pow	er Station	v
	true-up using the check b	ox.					
ORIS Source Name State Authorized Authorized Represent		Total Allowances Pending Deduction	Last Update	Processing Status	Certified?	Paragraph 3 Document	Paragraph (4)(ii) Document
555 Industrial Power 1001-2002 James, Mary Station					No		
	rocess True-Up button on	•					Export Data

Compliance Processing page.

Step 3: How to conduct draft true-up

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



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, 2024 and March 1, 2024.
- This report can only be accessed by the AAR or AAAR of the CO₂ budget source in COATS.
- Compliance certification may include an electronic certification and/or paper certification process as required by each state:
 - Electronic compliance certification must be submitted through COATS by the AAR or AAAR no later than 11:59 PM ET on March 1, 2024.
 - If a paper compliance certification report is required, it must be printed by the AAR/AAAR from 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, 2024.

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.

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 COATS password and click the "Submit" button.
 - For CO₂ budget sources located in CT or MD, the Certification Report must be printed from 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, VT or VA, 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 RI, you may click "Submit" or print, sign, and send a copy of the report with any attachments to the relevant state agency.
 - For CO₂ budget sources located in all other states, you must click "Submit" and certify compliance electronically.

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 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

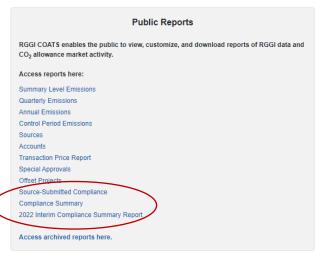
There will be 2 public compliance data reports in COATS:

- Source-Submitted Compliance Report (March 4, 2024)
 - This report will be publicly available in 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 archived on April 2, 2024 and remain available.
- Compliance Summary Report (April 2, 2024):
 - This report will replace the Source-Submitted Compliance Report in COATS.
 - This report will include state-derived compliance evaluations of compliance.

Step 5: How to view compliance reports

 Go to the COATS homepage and click on the desired report category in the "Public Reports" section of the screen. No login is required.







The Regional Greenhouse Gas Initiative (RGGI) is a cooperative, market-based effort by participating states to cap and reduce CO₂ emissions from the power sector. The RGGI CO₂ Allowance
Tracking System (RGGI COATS) is the platform that records and tracks data for each state's CO₂ Budget Trading Program.

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Question & Answer

- To ask a question during the webinar: Send your question via the "Q&A" function 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 Lei Pei at RGGI, Inc.: lei.pei@rggi.org

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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 https://www.rggi.org/program-overview-and-design/state-regulations.

RGGI Website

 Additional information related to compliance can be found at: https://www.rggi.org/allowance-tracking/compliance.

RGGI COATS:

- o RGGI COATS can be accessed at: rggi-coats.org.
- For more information, see the RGGI COATS <u>User's Guide.</u>

US EPA's Emissions Reporting Requirements

See the US EPA CAMD website at https://www.epa.gov/airmarkets.

Contacts

- For questions related to COATS, please email rggi-coats@gdit.com.
- For other questions related to compliance, please contact the relevant state contact person below.

State	Contact Person	Email	Phone
СТ	Mike LaFleur	Michael.LaFleur@ct.gov	(860) 424-3462
DE	Valerie Gray	Valerie.Gray@delaware.gov	(302) 739-9402
ME	Eric Kennedy	Eric.Kennedy@maine.gov	(207) 530-3139
MD	Roland Gorschboth	Roland.Gorschboth@maryland.gov	(410) 537-4130
MA	Will Space	William.Space@state.ma.us	(617) 292-5610
NH	Phil LaMoreaux	Philip.W.LaMoreaux@des.nh.gov	(603) 271-7624
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NY	Mike Sheehan	Michael.Sheehan@dec.ny.gov	(518) 402-8396
RI	Dena Gonsalves	Dena.Gonsalves@dem.ri.gov	(401) 222-2808 x2777017
VT	Brian Woods	Brian.Woods@vermont.gov	(802) 272-4496
VA	Thomas Ballou	Thomas.Ballou@deq.virginia.gov	(804) 698-4406

Thank You!

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

https://www.rggi.org/allowance-tracking/compliance