

Preparing for CO₂ Budget Source 2024 Interim Control Period Compliance

October 10, 2024

Webinar Outline

- Introduction
- Key Terms
- Compliance Timeline & Milestones
- Interim Compliance Process Checklist: 6 Steps
- Interim Compliance in RGGI COATS: Demonstration
- Question & Answer
- Additional Resources & Contacts

Introduction

What is RGGI CO₂ Budget Source Interim Compliance?

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- 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.
- For each interim control period (each of the first two calendar years of each three-year control period), each CO₂ budget source must provide allowances equal to 50 percent of its emissions during each interim 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.)
- A CO₂ allowance represents a limited authorization to emit one short ton of CO₂, as issued by a RGGI state.
- The sixth control period began on January 1, 2024 and extends through December 31, 2026. The **current 2024 interim control period** began on January 1, 2024 and extends through December 31, 2024.

Introduction

What is RGGI CO₂ Budget Source Interim 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 Interim Compliance Obligation: 50 percent of the total tons of CO₂ emitted during the 2024 interim 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 CO₂ Interim Compliance Obligation to the sum of any CO₂ allowances already surrendered and those remaining in the compliance account. (Draft true-up must be run by 11:59 PM ET on March 3, 2025.)

^{*} New York applicability requirements are 15 MW or greater. See <u>state statutes and regulations</u> 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. The allowance transfer deadline for the 2024 interim compliance is March 3, 2025.

- 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 interim compliance to the relevant state's surrender account in COATS upon interim compliance true-up. Interim compliance true-up will occur on March 4, 2025.
- 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, 2025 through March 3, 2025).

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.

Compliance Timeline & Milestones

December 31, 2024

End of the 2024 interim control period

March 3, 2025 11:59 PM ET

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

Last auction to acquire CO₂ allowances for compliance

Submit Q4-2024 CO₂ emissions data to US EPA CAMD

Run draft trueup & provide CO₂ allowances for compliance* CO₂ Allowances are deducted for interim compliance (not including previously surrendered allowances)

2024 Interim
Compliance
Summary
Report
available

December 4, 2024

 Auction 66: Last auction to acquire CO₂ allowances in the 2024 interim control period

January 30, 2025

 Q4-2024 CO₂ emissions data reporting deadline

March 4, 2025

•2024 interim compliance true-up

*Note that compliance certification is not required for interim compliance

- ☐ Step 1: Confirm access to the US EPA's CAMD Business System.
- ☐ Step 2: Confirm user registration in COATS.
- \square Step 3: Acquire sufficient CO_2 allowances to meet CO_2 interim compliance obligation.
- \square Step 4: Submit CO₂ emissions data to the US EPA by January 30, 2025.
- ☐ Step 5: Run draft true-up in COATS by March 3, 2025.
- \square Step 6: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 3, 2025).

☐ 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: Acquire sufficient CO₂ allowances to meet CO₂ interim compliance obligation
- CO₂ allowances can be obtained in two ways:
 - CO₂ Allowance Auctions
 - Auction 66, to be held on December 4, 2024, is the final RGGI auction to purchase CO₂ allowances before the end of the 2024 interim control period.
 - The Auction 66 Notice was released on October 8, 2024.
 - 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 3, 2025.
 - It is strongly recommended that you obtain all CO₂ allowances necessary for compliance well before the allowance transfer deadline.

- Step 4: Submit CO₂ emissions data to the US EPA by January 30, 2025
- Emissions for the final quarter of the interim control period (Q4-2024) must be submitted to US EPA's CAMD Business System by January 30, 2025.
- CO₂ emissions data updates for the 2024 interim control period will continue to flow to COATS from the CAMD system through interim 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 5: Run draft true-up in COATS by March 3, 2025

- CO₂ budget sources must run draft true-up in COATS by 11:59 PM ET on March 3, 2025, which will compare their CO₂ interim 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.
- Note that compliance certification is not required for interim compliance.
- Interim compliance true-up will occur on March 4, 2025, and the 2024 Interim Compliance Summary Report will be made available in COATS.

- ☐ Step 6: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 3, 2025)
- All CO₂ budget sources must hold sufficient CO₂ allowances in their compliance account (not including any CO₂ allowances previously surrendered) to meet their CO₂ interim compliance obligation in COATS by 11:59 PM ET on March 3, 2025.
- Please note the CO₂ interim compliance obligation will reflect any emissions data updates that may occur after the emissions reporting deadline of January 30. Therefore, you should consider the potential for such updates when determining how many CO₂ allowances to hold in your compliance account for interim compliance.
- Deduction of CO₂ Allowances: Following the allowance transfer deadline of March 3, 2025, CO₂ allowances will be deducted from each CO₂ budget source's compliance account, and the 2024 Interim Compliance Summary Report will be made available in COATS.

- ☐ Step 6: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 3, 2025)
- Surrendering of CO₂ Allowances (optional): If you wish to identify specific CO₂ allowances to use for interim compliance, you may do so by using the Compliance Deduction Transaction in COATS between January 31, 2025 and March 3, 2025.
 - 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 interim 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 1: How to determine your total CO₂ interim compliance obligation

Step 2: How to provide CO₂ allowances for interim compliance

Step 3: How to conduct draft true-up

Step 4: How to view compliance reports

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

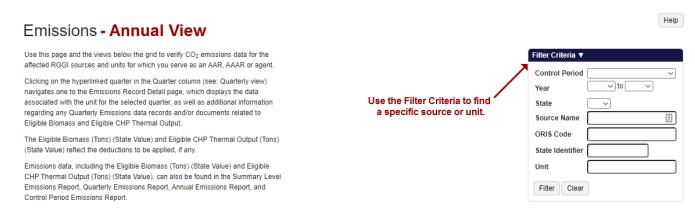
Step 1: How to determine your total CO₂ interim compliance obligation

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 interim compliance obligation

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



Year	State	ORIS Code	Source Name	State Identifier	Unit ID	Control Period	Op Time	Op Hours	Heat Input (mmBtu)	CO2 Mass (Tons)
2021	DE	555	Industrial Power Station	1001-2002	1	01/01/2021 - 12/31/2023	1,321.00	1444	587,375	34,557
2020	DE	555	Industrial Power Station	1001-2002	1	01/01/2018 - 12/31/2020	1,372.00	1783	625,322	34,650
2019	DE	555	Industrial Power Station	1001-2002	1	01/01/2018 - 12/31/2020	1,317.00	1435	640,150	35,373
2018	DE	555	Industrial Power Station	1001-2002	1	01/01/2018 - 12/31/2020	1,338.00	1338	586,000	34,760
2021	DE	555	Industrial Power Station	1001-2002	2	01/01/2021 - 12/31/2023	1,332.00	1446	579,551	34,453



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.

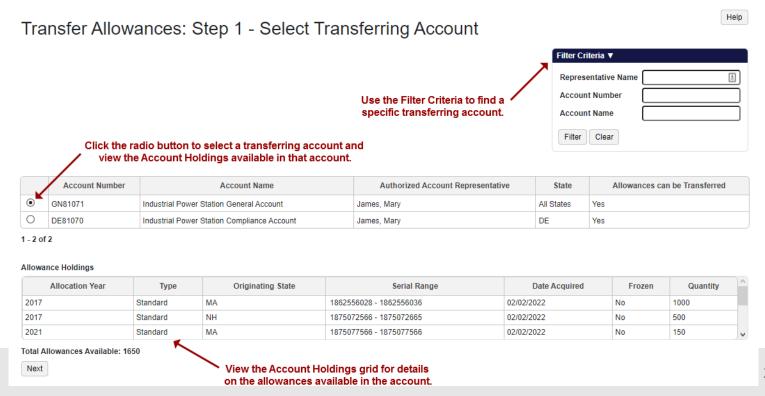
Step 2: How to provide CO₂ allowances for compliance

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



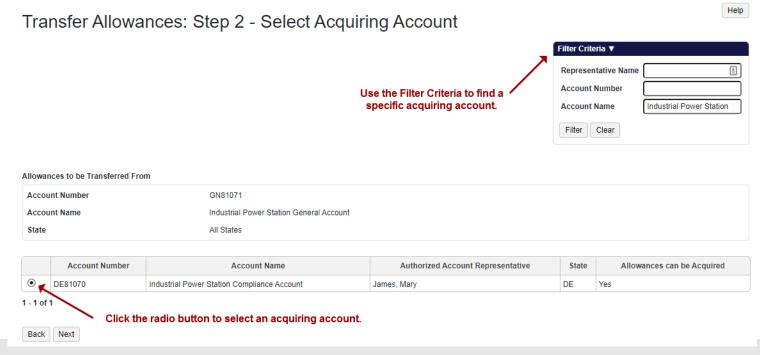
Step 2: How to provide CO₂ allowances for compliance

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



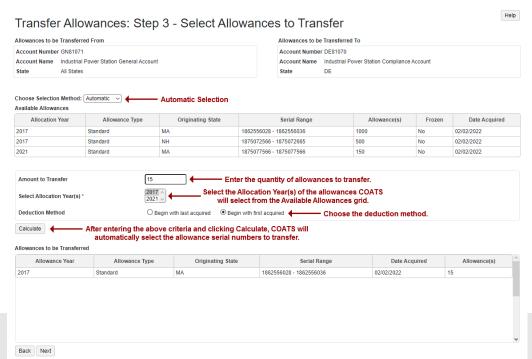
Step 2: How to provide CO₂ allowances for compliance

Select the Acquiring Account which will receive the CO₂ allowances.



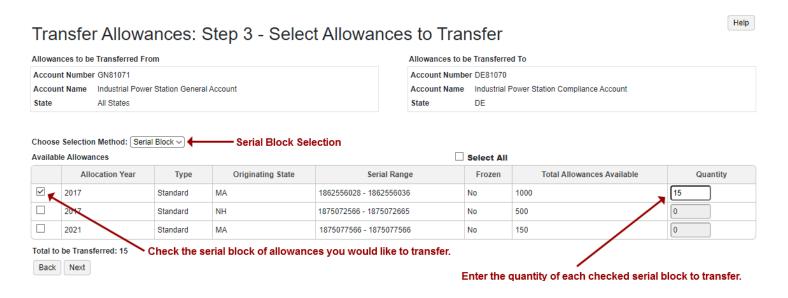
Step 2: How to provide CO₂ allowances for compliance

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

Transfer Allowances: Step 4 - Review and Approve Transaction

Allowances to be Transferred From

Account Number
Account Name
Industrial Power Station General Account
Account Name
Industrial Power Station General Account
State
All States
All States
Authorized Account Representative James, Mary

Allowances to be Transferred To

Account Number
DE81070
Account Name
Industrial Power Station Compliance Account
State
DE
Authorized Account Representative James, Mary

Allowances to be Transferred

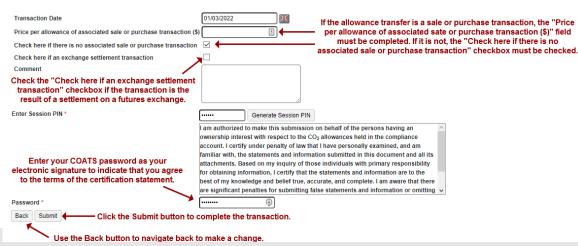
Allocation Year	Туре	Originating State	Serial Range	Date Acquired	Quantity
2017	Standard	MA	1862556028 - 1862556036	02/02/2022	15

Total to be Transferred: 15

The CO₂ allowance transfer must include a transaction date, which is the date of the completion of the sale or purchase transaction for the CO₂ allowance(s), if any, and must include the sale or purchase price of the CO₂ allowance that is the subject of a sale or purchase transaction. The "sale or purchase transaction" is the financial transaction associated with the current allowance transfer. Note that the "sale or purchase transaction" may have occurred prior to the date that the allowance transfer is recorded in COATS, and that RGGI COATS will automatically record today's date as the transaction date if you do not report a transaction date.

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 RGGI COATS should be consistent with the payment instructions to the respective buyer clearing member 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.



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Help

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.

Your allowance transfer has been c					Print the page for your record using the Print button. will be forwarded shortly.		
Recorded Date Fransaction Date Fransaction ID Fransaction Status State Price per allowance of associated :	sale or purchase transaction (\$)	02/04/2022 01/03/2022 rggi169736 Complete DE	Check your email c	email inbox for a onfirmation of th	system-generated e transaction.		
lowances Transferred From			Allowa	nces Transferred To			
Account Number GN81071 Account Name Industrial Power Station General Account State All States Authorized Account Representative James, Mary			Account Number DE81070 Account Name Industrial Power Station Comp State DE Authorized Account Representative James, Mary		Industrial Power Station Complian	nce Account	
Allowances Transferred							
Allocation Year	Туре		Originating State		Serial Range	Quantity	
2017	Standard	MA		1862556028 - 1862556036 1			
otal Allowances Transferred 15 ransaction Status History	Date			Trai	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 3, 2025.
- 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

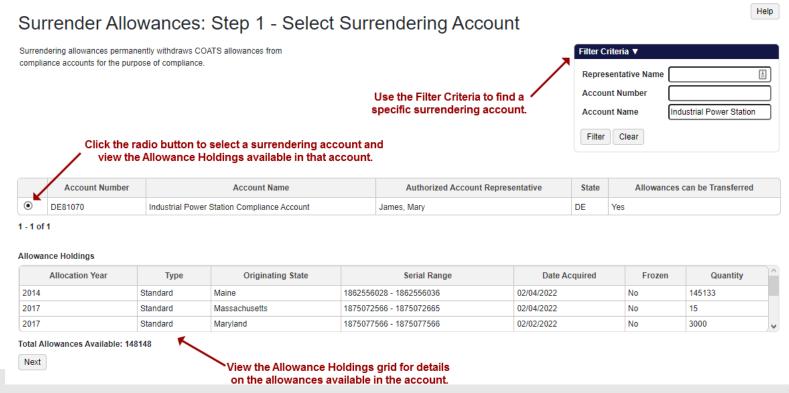
To conduct a Compliance Deduction Transaction:

- 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.



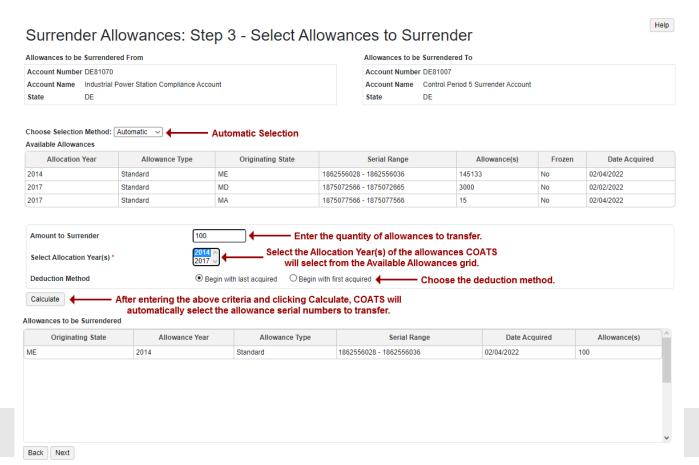
Step 2: How to provide CO₂ allowances for compliance

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

		·	Surrender Account	riteria ▶					
llowa	nces to be Surrendered Fro	om							
Acco	unt Number	DE81070							
Acco	unt Name	Industrial Power Station Compliance	Industrial Power Station Compliance Account						
State		DE	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				

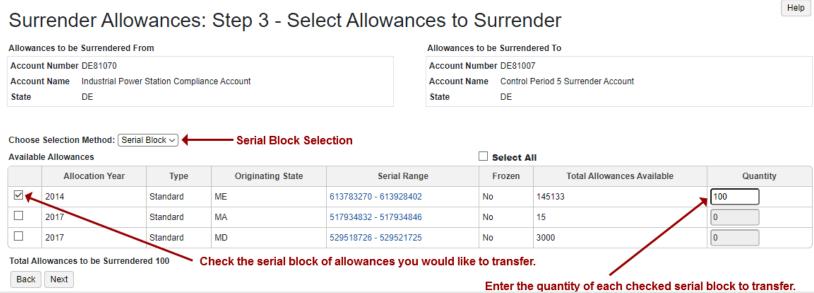
Step 2: How to provide CO₂ allowances for compliance

4a. Select Allowances to Surrender – Automatic Selection Method



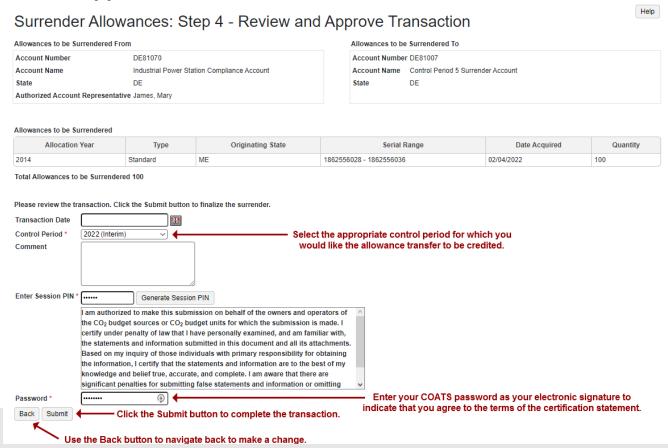
Step 2: How to provide CO₂ allowances for compliance

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.



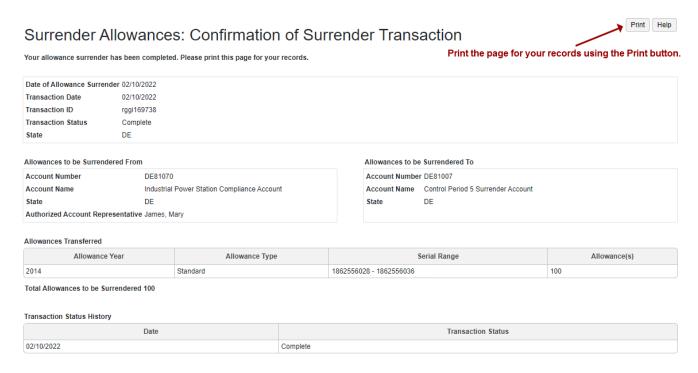
Step 2: How to provide CO₂ allowances for compliance

5. Review and approve the transaction.



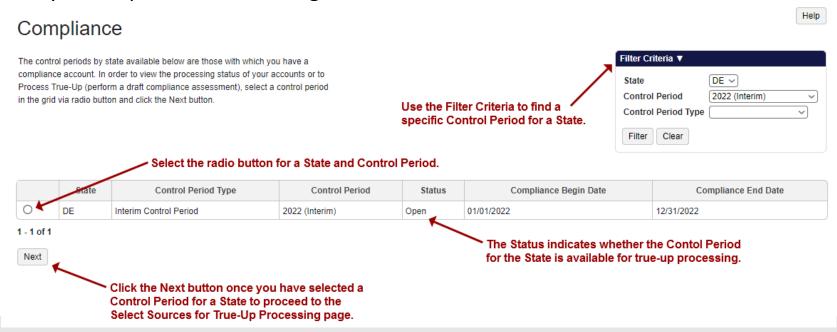
Step 2: How to provide CO₂ allowances for compliance

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



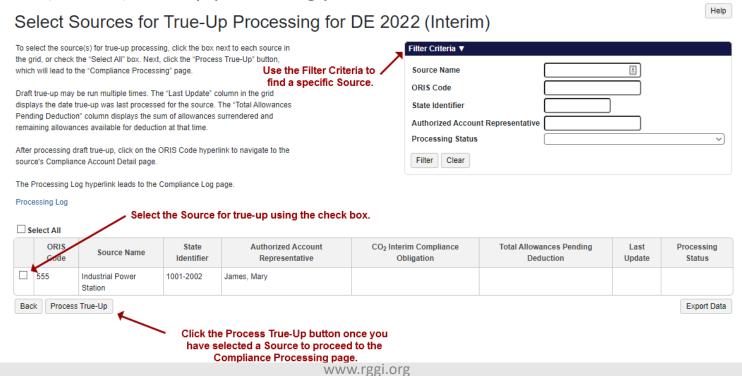
Step 3: How to conduct draft true-up

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.



Step 3: How to conduct 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.



Account Name	Account Number	ORIS Code	Unit ID(s)	Total CO ₂ Emissions	Biomass Emissions Deducted	CHP Thermal Output Emissions Deducted	CO ₂ Interim Compliance Obligation	AAR Surrendered Allowances	Default Deductions	Total Allowances Deducted	Status	Result
Industrial Power Station Compliance Account	DE81070	555	1, 2	69,010	0	0	34,505	100	34,405	34,505	Complete	CO2 Interim Compliance Obligation = Allowances

Return to Grid

Step 4: How to view compliance reports

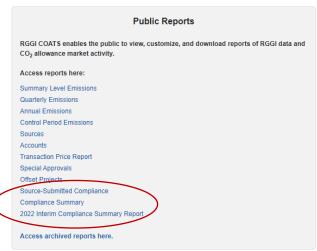
The 2024 Interim Compliance Summary Report

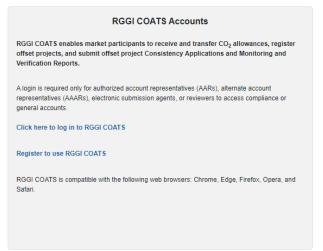
- This report will be publicly available in COATS and will show data regarding CO₂ allowances provided by CO₂ budget sources to meet their interim compliance obligation for that interim control period.
- This report will be available to the public following interim compliance true-up.

Step 4: 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

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.

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СТ	Mike LaFleur	Michael.LaFleur@ct.gov	(860) 424-3462
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ME	Eric Kennedy	Eric.Kennedy@maine.gov	(207) 530-3139
MD	Roland Gorschboth	Roland.Gorschboth@maryland.gov	(410) 537-4130
MA	Camila Pedrosa	mariacamila.pedrosa@mass.gov	(857) 301-1681
NH	Cathy Beahm	catherine.a.beahm@des.nh.gov	(603) 271-6793
NJ	Doug Benton	Douglas.Benton@dep.nj.gov	(609) 984-3355
NY	Mike Sheehan	Michael.Sheehan@dec.ny.gov	(518) 402-8396
RI	Dena Gonsalves	Dena.Gonsalves@dem.ri.gov	(401) 537-4377
VT	Brian Woods	Brian.Woods@vermont.gov	(802) 272-4496

Thank You!

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

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