

The Regional Greenhouse Gas Initiative

an initiative of Eastern States of the US

CO₂ Budget Source 2025 Interim Control Period Compliance: Frequently Asked Questions

Under each RGGI participating state's CO₂ Budget Trading Program, each regulated power plant (a "CO₂ budget source") is required to hold one CO₂ allowance in the RGGI CO₂ Allowance Tracking System (COATS) for each ton of CO₂ emitted during the preceding three-year control period. The sixth three-year control period began on January 1, 2024 and extends through December 31, 2026 for the states of Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

This document provides some frequently asked questions for CO₂ budget sources regarding the 2025 interim control period compliance process in COATS. To learn more about CO₂ Budget Source interim control period compliance, see the RGGI website: <https://www.rggi.org/allowance-tracking/compliance>.

1. *How does an interim control period differ from three-year control periods?*

Answer: Starting in the third control period, each CO₂ budget source must hold allowances equal to 50 percent of their 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 their remaining emissions for the three-year control period at the end of the three-year control period. The 2025 interim control period began on January 1, 2025 and each CO₂ budget source must hold allowances available in their compliance account for compliance deduction equal to 50 percent of their emissions by March 2, 2026.

An Interim Compliance Summary Report will be available following each interim control period's Allowance Transfer Deadline and an updated Compliance Summary Report will be made available following the states' evaluation of compliance at the end of the three-year control period.

Illustrative example of interim control period compliance:

Year In 3-Year Control Period	CO ₂ Emissions (Short Tons)	CO ₂ Interim Compliance Obligation (Allowances to be Deducted from Compliance Account)	Three-Year Control Period CO ₂ Compliance Obligation (Allowances to be Deducted from Compliance Account)	Total Cumulative Allowances Deducted
1 st	1,000	500 (provide by 3/2025)	N/A	500
2 nd	1,000	500 (provide by 3/2026)	N/A	1,000
3 rd	1,000	N/A	2,000 (provide by 3/2027)	3,000

The Regional Greenhouse Gas Initiative

an initiative of Eastern States of the US

2. *What are the steps I need to take for interim control period compliance?*

Answer: The CO₂ Budget Source Interim Compliance [Checklist](#) serves as a guide to help CO₂ budget sources understand the CO₂ budget source interim compliance process.

3. *Can I run draft true-up multiple times?*

Answer: An Authorized Account Representative (AAR), Alternate Authorized Account Representative (AAAR), or Electronic Submission Agent (Agent) may run draft true-up as many times as needed until 11:59 PM ET on March 2, 2026.

4. *Can I run draft true-up for multiple sources at a time?*

Answer: Yes, the AAR, AAAR, or Agent of a CO₂ budget source can run draft true-up for multiple sources at a time.

5. *Do I need to certify compliance?*

Answer: A compliance certification report is not required as part of the compliance obligation during an interim control period.

Compliance certification will be required for final compliance at the end of the three-year control period. Only the AAR or AAAR for a CO₂ budget source may certify compliance for that source.

6. *How do I know if my CO₂ emissions, or my “CO₂ Interim Compliance Obligation” (50 percent of the tons of CO₂ emitted during the preceding one-year interim control period, less any eligible emissions deductions), are equal to (or greater than) my Compliance Account allowances available for deduction?*

Answer: In the interim compliance module of RGGI COATS, when you select a source(s) on the “Select Sources for True-Up Processing for [state identifier] 2025 (Interim)” screen and click Process True-Up, you will be taken to the “Compliance Processing” screen. On this page you can see if your total CO₂ Interim Compliance Obligation is equal to or greater than your Total Allowances Deducted. The Result column will tell you if your CO₂ Interim Compliance Obligation is greater than or equal to allowances.

7. *When I navigate to the “Select Sources for True-Up Processing for [state identifier] 2025 (Interim)” screen in COATS, it looks like my data is not updated even though I have*

The Regional Greenhouse Gas Initiative

an initiative of Eastern States of the US

transferred allowances to my compliance account and/or surrendered allowances. How do I update my data?

Answer: True-up is a manual process and does not occur automatically. The data on this page will update when you select the relevant source(s) and click the “Process True-Up” button.

8. *Are there any restrictions regarding the allocation year of CO₂ allowances which may be used to meet CO₂ compliance obligations for a given control period?*

Answer: CO₂ compliance obligations for a given control period may be met using CO₂ allowances of an allocation year within and prior to that three-year control period; this applies to CO₂ interim compliance obligations as well as three-year CO₂ compliance obligations. For example, at the end of the sixth three-year control period (2024-2026), the full three-year CO₂ compliance obligation may be met using allocation year 2026 CO₂ allowances or any CO₂ allowances from allocation years prior to 2026. (The allocation years of the CO₂ allowances used for compliance do not need to correspond to the year during which the covered emissions occurred.)

CO₂ allowances from future allocation year allowances may not be used to meet CO₂ compliance obligations within a current control period. For example, allocation year 2027 CO₂ allowances may not be used for either CO₂ interim compliance obligations or three-year CO₂ compliance obligations for the sixth control period.

9. *What if the amount of CO₂ allowances that I provided for interim control period compliance is less than my “CO₂ Interim Compliance Obligation”?*

Answer: If there is a shortfall of allowances, the status of “CO₂ Interim Compliance Obligation > Allowances” will display in the Interim Compliance Summary Report and the compliance account will be frozen such that allowances will not be able to be transferred out of the account.

The RGGI participating state may choose to subject the owners and operators of the CO₂ budget source to pay any fine, penalty, or assessment or comply with any other remedy imposed. Note that CO₂ Interim Compliance Obligations are independent for each interim control period (i.e., the second year’s CO₂ Interim Compliance Obligation is unaffected by any amount provided for the first year’s CO₂ Interim Compliance Obligation).

If the amount of CO₂ allowances provided for final compliance at the end of the three-year control period is less than the source’s “CO₂ Compliance Obligation”, the source will be required to

The Regional Greenhouse Gas Initiative

an initiative of Eastern States of the US

surrender CO₂ allowances equal to three times the number (tons) of the source's excess emissions and may also be subject to state-specific penalties for non-compliance.

10. What should I do if my CO₂ emissions data is updated or is missing?

Answer: Facility information for CO₂ budget sources is stored and maintained in the U.S. Environmental Protection Agency's (U.S. EPA's) Clean Air Markets Division (CAMD) Business System and reflected in RGGI COATS. If there are any changes or issues with your CO₂ emissions data, please contact the EPA and your relevant state contact.

11. Where can I find more information related to CO₂ budget source compliance?

Answer: The compliance process for CO₂ budget sources is governed by the applicable CO₂ Budget Trading Program of the participating state in which the facility is located. For more information, see: <https://www.rggi.org/program-overview-and-design/state-regulations>.

To learn more about CO₂ Budget Source Interim Compliance, see the RGGI website: <https://www.rggi.org/allowance-tracking/compliance>.

For more information on RGGI COATS please see the RGGI COATS [User's Guide](#).

12. Who should I contact with questions?

Answer: For questions related to using RGGI COATS, please email rggi-coats@gdit.com. For other questions related to compliance, please contact the appropriate state representative:

State	Contact Person	Email	Phone
Connecticut	Mike LaFleur	Michael.LaFleur@ct.gov	(860) 424-3462
Delaware	Yagna Shah	yagna.shah@delaware.gov	(302) 739-9402
Maine	Eric Kennedy	Eric.Kennedy@maine.gov	(207) 530-3139
Maryland	Roland Gorschboth	roland.gorschboth@maryland.gov	(410) 537-4130
Massachusetts	Camila Pedrosa	mariacamila.pedrosa@mass.gov	(857) 301-1681
New Hampshire	Michael Rieger	michael.r.rieger@des.nh.gov	(603) 271-6794
New Jersey	Doug Benton	douglas.benton@dep.nj.gov	(609) 940-5749
New York	Ona Papageorgiou	ona.papageorgiou@dec.ny.gov	(518) 402-8396
Rhode Island	Dena Gonsalves	Dena.Gonsalves@dem.ri.gov	(401) 537-4377
Vermont	Brian Woods	Brian.Woods@vermont.gov	(802) 272-4496