

Regional Greenhouse Gas Initiative

Preparing for CO₂ Budget Source Fourth Control Period Compliance

September 29, 2020

Webinar Outline

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

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 fourth control period began on January 1, 2018 and extends through December 31, 2020.
 - 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

- **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 fourth control period by a CO₂ budget source, less any eligible emissions deductions (as determined by each state).

.

- 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.
- Draft True-Up: The process in COATS which compares the CO₂ 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 1, 2021.)

Note: 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).

ey lerms

• 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, 2021.

.

• Surrendering of CO, Allowances: The optional process by which a CO_2 budget source may identify specific CO_2 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 February 1, 2021 through March 1, 2021).

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.

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, 2021: Deadline to submit CO₂ emissions data to the US EPA for Q4-2020, the final quarter of the fourth control period.
- For more information on the US EPA's emissions reporting requirements, see: <u>https://www.epa.gov/airmarkets</u>.

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, 2021).
- 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:
 - CO₂ Allowance Auctions: Auction 50, to be held on December 2, 2020 is the last quarterly CO₂ Allowance Auction to purchase CO₂ allowances before the end of the fourth control period.
 - For more information on RGGI CO₂ allowance auctions, see: <u>https://www.rggi.org/auctions/auction-materials</u>.
 - 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, 2021.
- 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 February 1, 2021 and March 1, 2021.

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, 2021.

c) Certify compliance

 CO₂ budget sources are also required to certify compliance between February 1, 2021 and March 1, 2021 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, 2021 April 1, 2021): 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, 2021, which is April 2, 2021. Between March 2, 2021 and final compliance true-up:
 - **CO**₂ allowances of an allocation year from the fourth control period or prior will be frozen in COATS compliance accounts. You will not be able to transfer or receive allocation year 2009-2020 CO₂ allowances in your compliance account.
 - CO₂ Allowances in COATS general accounts will NOT be frozen. To receive or transfer allocation year 2009-2020 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 <u>User's Guide</u>.

Stage 3: Compliance Evaluation

- Final compliance true-up will occur on the first business day following April 1, 2021, which is April 2, 2021. Following final compliance true-up on April 2, 2021:
 - 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 2009-2020 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 2, 2021)
 - 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, 2021 and remain available.
 - Compliance Summary Report (April 2, 2021):
 - 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



- **Step 1**: Confirm access to the US EPA's CAMD Business System.
- **Step 2**: Confirm user registration in COATS.

Steps

- **<u>Step 3</u>**: (*Recommended*) Have a general account open in COATS.
- **Step 4:** Acquire sufficient CO_2 allowances to meet CO_2 compliance obligation.

.

- **Step 5**: Submit CO_2 emissions data to the US EPA by January 30, 2021.
- □ **<u>Step 6</u>**: Provide sufficient CO₂ allowances in COATS compliance account by the allowance transfer deadline (March 1, 2021).
- **Step 7**: Run draft true-up in COATS by March 1, 2021.
- □ **<u>Step 8</u>**: 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, 2021).

ebs

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-to-date. 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 <u>https://camd.epa.gov/CBS/login/auth</u> for more information about the CAMD Business System.

Step 2: Confirm user registration in COATS

teps

- 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), and any Agents (if applicable) for COATS are current and have access to COATS.
 - Agents 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.

Steps

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

- From March 2, 2021 through final compliance true-up on April 2, 2021, CO₂ budget sources will not be able to transfer or receive allocation year 2009-2020 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 2009-2020 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 50, to be held on December 2, 2020 is the final RGGI auction to purchase CO₂ allowances before the end of the fourth control period.

.

- The Auction 50 Notice will be released by October 6, 2020.
- 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, 2021.
 - 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, 2021

- Emissions for the final quarter of the fourth control period (Q4-2020) must be submitted to US EPA's CAMD Business System by January 30, 2021.
- CO₂ emissions data updates for the fourth 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 and/or Agent(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, 2021)
- 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, 2021.
- Please note the CO₂ compliance obligation will reflect any emissions data updates that may occur after March 1, 2021. 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, 2021, 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, 2021)
- 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 February 1, 2021 and March 1, 2021.
 - 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, 2021

- CO₂ budget sources must run draft true-up in COATS by 11:59 PM ET on March 1, 2021, 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, 2021 in the Compliance Summary Report in COATS.

Step 8: Certify compliance by the Compliance Certification Deadline (between February 1 – March 1, 2021)

- 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, 2021.
 - 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 New Jersey and Vermont: Electronic and paper certification required.
 - For CO₂ budget sources located in Delaware, Maine, Massachusetts, New Hampshire, 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 | No | N/A |
| 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 |

| State | Electronic Certification Required? | Paper Certification Required? | State Mailing Address: |
|-------|------------------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NH | Yes | No | N/A |
| IJ | Yes | Yes | New Jersey Department of Environmental Protection Bureau of Climate Change and Clean Energy Attn: NJ RGGI Program, 401 E. State Street, 2nd Floor, Mail code 401-02H P.O. Box 420 Trenton, NJ 08625-0420 |
| 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 |
| VT | Yes | Yes | Vermont Department of Environmental Conservation Air Quality and Climate Division Attn: Brian Woods One National Life Drive – Davis 2 Montpelier, VT 05620-3802 |



- **<u>Step 1</u>**: How to determine your total CO₂ compliance obligation
- **<u>Step 2</u>**: How to provide CO₂ allowances for compliance
- **<u>Step 3</u>**: How to conduct draft true-up
- **Step 4:** How to certify compliance
- **<u>Step 5</u>**: 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, or Electronic Submission Agent (Agent).



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 and Eligible CHP Thermal Output (Tons) (State Value) contain the deductions to be applied, if any.

| Filter Criteria 🔻 | |
|-------------------|---|
| Control Period | |
| State | • |
| Source Name | |
| ORIS Code | |
| State Identifier | |
| Unit | |
| Filter Clear | |

| 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) | Eligible CHP Thermal Output (Tons) (State Value) | * III |
|-------|--------------|-------------|---------------------|------------|-------------------------------|-------------|--------------------------|-----------------------|----------------------------------------------|---------------------------------------------------|-----------------------------------------------------------|-------|
| VT | 3734 | DEMO 1 | 2630100084 | CTG7A | 01/01/2018 - 12/31/2020 | 3,046.75 | 4,174,052 | 256,853 | | | | |
| VT | 3734 | DEMO 1 | 2630100084 | CTG7B | 01/01/2018 - 12/31/2020 | 2,674.74 | 3,666,507 | 225,680 | | | | - |
| VT | 3754 | DEMO 2 | 1472200926 | 001 | 01/01/2018 - 12/31/2020 | 2,294.96 | 2,245,619 | 138,645 | | | | - |
| VT | 3754 | DEMO 2 | 2630401377 | VB01 | 01/01/2018 | 116.59 | 44,404 | 2,639 | | | | - |

1 - 8 of 8 Show Replaced Data Show Control Period Data Control Period page view

Show Annual Data

Show Quarterly Data

your local drive.



Export Data

www.rggi.org

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.
 - \circ 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.

| RGGI | RGGI CO ₂ Allowance Tracking System | | | | | | | | | |
|-------------------------------------------|------------------------------------------------|-------------------------------------------|-----------------|-----------------|---------------------|---------------------------------------------|-------------------|----------------------|-----------|--|
| | | | | | | and the second second | | | | |
| | | | | | | RGGI C | O ₂ Bu | dget T rading | PROGRAMS | |
| Accounts | Sources | Special Approvals | Offset Projects | Emissions | Compliance | Allowance Transact | ions | Public Reports | Reference | |
| Click on Tra CO2 allowa (general an | ansfer Allov nces betwo id compliai | wances to move = een accounts nce). | | | | Transfer Allowances Compliance Deduction | | | | |
| | | | The Region | al Greenhouse G | Bas Initiative (RGG | il) is a uce emissions | An | nouncements | | |

Step 2: How to provide CO₂ allowances for compliance

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

Transfer Allowances: Step 1 - Select Transferring Account



1-2 of 2

Allowance Holdings

| Allocation Year | Туре | 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 | |
| | | | | | - C.C. | | ~ |
| < | | | | | |) | 1 |
| Next | Vie the To | ew the Allowa allowances h otal Allowanc | ance Holding grid for deta reld in the account, includ ces Available in the lower band corner. | hils on ling the right | Total Allow | vances Available | : 13 |

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.

Transfer Allowances: Step 3 - Select Allowances to Transfer

| Allowances to be Tra | nsferred From | | | Allowances to be Transferred To | | | | | | |
|----------------------------------------------------------------------------------|---------------------|---------------------------------------------------------|------------------|-------------------------------------------------------------------------------------|--------------------------------------|------------------|-----------------|--|--|--|
| Account Number CT10788 Account Name ABC Source Compliance Account State CT | | | | Account Number CT10722 Account Name New CT Source Compliance Account State CT | | | | | | |
| Choose Selection M vailable Allowances | tethod: Automatic 🗸 | Automatic | Selection | | | | | | | |
| Allocation Year | Allowance Type | Originating State | Sec | ial Range | Allowance(s) | Frozen | Date Acquired | | | |
| 008 | Standard | NY. | 11851 | 74-1185183 | 10 | No | 08/28/2008 | | | |
| 8008 | Long Term Contract | NY | 11888 | 62-1188864 | 3 | No | 08/28/2008 | | | |
| Select Allocation Yea | r(s) * | 2009 2010 2011 | Select the | e Allocation Year | of the allowance Allowances grid. | es COATS | will on method. | | | |
| Calculate | After en automat | tering the above criteria a tically select the allowand | and clicking | g Calculate, COA mbers to transfe | TS will r. | | | | | |
| anomances to be fran | | | | | A store | | | | | |
| Allowance Year | Allowance | Type Serial | Range | Originating | State Dat | e Acquired | Allowance(s) | | | |
| Allowance Year | Allowance | Type Serial 1185174- | Range 1185177 | Originating NY | State Dat 08/28/200 | e Acquired 08 | Allowance(s) | | | |
| Allowance Year | Allowance | • Type Serial 1185174- | Range 1185177 | Originating NY | State Dat 08/28/200 | e Acquired 18 | Allowance(s) | | | |

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.

Help

38

Transfer Allowances: Step 3 - Select Allowances to Transfer



5. Review and approve the transaction

Transfer Allowances: Step 4 - Review and Approve Transaction

| Allowances to be Transferred From | |
|-----------------------------------|-------------------------------|
| Account Number | CT10788 |
| Account Name | ABC Source Compliance Account |
| State | ст |
| Authorized Account Representative | Reilly, Megan |

| Allowances to be Transferred To | |
|-----------------------------------|----------------------------------|
| Account Number | CT10722 |
| Account Name | New CT Source Compliance Account |
| State | ст |
| Authorized Account Representative | Allen, John |

Allowances to be Transferred

| Allocation Year | Туре | 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 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 date if you do not report a transaction date. 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.



Step 2: How to provide CO₂ allowances for compliance

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.

| Recorded Date | | 08/22/2018 | | | |
|---------------------------|--------------------------------|----------------|---------------------------|-------------------|-------------------------|
| Transaction Date | | 08/22/2018 | Check your email | inbox for a | |
| Transaction ID | | rggi163818 | system-generated | d email | |
| Transaction Status | | Complete | confirmation of th | e transaction. | |
| State | | All States | | | |
| Price per allowance of as | ssociated sale or purchase tra | ansaction (\$) | | | |
| Exchange Settlement Tra | insaction | No | | | |
| Allowances Transferred F | rom | | Allowances Transferred To | | |
| Account Number | CT10788 | | Account Number | CT10722 | |
| Account Name | ABC Source Complia | ance Account | Account Name | New CT Source (| Compliance Account |
| State | CT | | | CT | |
| Authorized Account Repre | esentative Reilly, Megan | | State | Allen John | |
| | | | Representative | , and it, o o int | |
| | | | | | |
| llowances Transferred | | | | | |
| Allocation Year | Туре | Originating St | ate S | erial Range | Quantity |
| 009 | Standard | NY | <u>511152127 - 511152</u> | 130 | 4 |
| | | | | Το | tal Allowances Transfer |
| | | | | | |
| ransaction Status History | 1 | | | | |
| | Date | | Transactio | n Status | |
| 0.000.0004.0 | | 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 February 1 to March 1, 2021.
- 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 CO_2 allowances to your compliance account (as described in previous slides).
- 2. In COATS, click on the **Compliance Deduction** sub-menu under the **Allowance Transactions** Menu.

| RGGI | | LOWANCE TRA | CKING SYSTE | M | | | | | |
|----------------------------|---------------------------|----------------------|-----------------|-----------------|--------------------|----------------------------------------|-------------------|----------------|-----------|
| | | - | | | | | | | |
| | | | | | | RGG | CO ₂ B | UDGET TRADING | FROGRAMS |
| Accounts | Sources | Special Approvals | Offset Projects | Emissions | Compliance | Allowance Trans | actions | Public Reports | Reference |
| Click on Co to surrende | mpliance [er allowand | eduction sub-menues. | | | | Transfer Allowance Compliance Deduc | is tion | | |
| | | | The Region | al Greenhouse G | as Initiative (RGG | il) is a | Ar | nnouncements | • |

Step 2: How to provide CO₂ allowances for compliance

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

Surrender Allowances: Step 1 - Select Surrendering Account

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

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

Use the filter criteria to find a specific transferring account.

| Filter Criteria 🔻 | |
|---------------------|--|
| Representative Name | |
| Account Number | |
| Account Name | |
| Filter Clear | |

| | Account Number | Account Name | Authorized Account Representative | State | Allowances can be Transferred |
|---|----------------|----------------------------|-----------------------------------|-------|-------------------------------|
| 0 | VT10236 | DEMO 1 Compliance Account | AAR, Vermont | VT | Yes |
| 0 | VT10257 | DEMO 2 Compliance Account | AAR, Vermont | VT | Yes |
| 0 | VT80967 | October Compliance Account | AAR, Vermont | VT | Yes |

1 - 3 of 3

Allowance Holdings

| Allocation Year | Туре | Originating State | Serial Range | Date Acquired | Frozen | Quantity | 1 |
|-----------------|----------|-------------------|-----------------------|---------------|--------|----------|---|
| 2009 | Standard | New Jersey | 359855107 - 359856106 | 09/18/2017 | No | 1000 | = |
| 2010 | Standard | New Jersey | 382747913 - 382747913 | 09/18/2017 | No | 1 | - |
| 2011 | Standard | Vermont | 607239225 - 607246985 | 04/28/2017 | No | 7761 | |
| 4 | | 1 | | 1 | 1 | • | |

Next

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. Total Allowances Available: 8763

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 Allowances: Step 2 - Select Surrender Account

| Filter Criteria 🔻 | |
|-----------------------------------|--|
| Authorized Account Representative | |
| Account Number | |
| Account Name | |
| Filter Clear | |

Allowances to be Surrendered From

| Account Number | VT10236 |
|----------------|---------------------------|
| Account Name | DEMO 1 Compliance Account |
| State | VT |

| | Account Number | Account Name | Authorized Account Representative | State | Allowances can be Acquired |
|---|----------------|------------------------------------|-----------------------------------|-------|----------------------------|
| 0 | VT80982 | Control Period 4 Surrender Account | | VT | Yes |
| | VT10256 | Control Period 2 Surrender Account | | VT | No |
| | VT10889 | Control Period 1 Surrender Account | | VT | No |
| | VT10962 | Control Period 3 Surrender Account | | VT | No |

1 - 4 of 4

Back Next

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

44

Help

Step 2: How to provide CO₂ allowances for compliance

-

4a. Select Allowances to Surrender – Automatic Selection Method

Surrender Allowances: Step 3 - Select Allowances to Surrender

| Allowances to be Surrendered From | Allowances to be Surrendered To |
|----------------------------------------|-------------------------------------------------|
| Account Number VT10236 | Account Number VT80982 |
| Account Name DEMO 1 Compliance Account | Account Name Control Period 4 Surrender Account |
| State VT | State VT |
| | |

Available Allowances Allocation Year Allowance Type **Originating State** Serial Range Allowance(s) Frozen Date Acquired NJ 359855107 - 359856106 09/18/2017 2009 Standard 1000 No 2010 Standard NJ 382747913 - 382747913 No 09/18/2017 1 2011 Standard VT 607239225 - 607246985 7761 04/28/2017 No 2014 Standard ME 613248376 - 613248376 1 No 09/18/2017

Automatic Selection

| Amount to Surrender | 100 Enter the quantity of allowances. |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Select Allocation Year(s) * | 2009 A 2010 2011 2014 - 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 the deduction method. |
| Calculate | |

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

Allowances to be Surrendered

Choose Selection Method: Automatic

| Originating State | Allowance Year | Allowance Type | Serial Range | Date Acquired | Allowance(s | |
|-------------------|----------------|----------------|-----------------------|---------------|-------------|---|
| NJ | 2009 | Standard | 359856007 - 359856106 | 09/18/2017 | 100 | |
| | | | | | | = |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | - |
| • | | | | | | • |
| Back Next | | | | | | |

45

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.

Surrender Allowances: Step 3 - Select Allowances to Surrender

| Allow | ances to be | Surrender | red From | | | Allowances to be | Surrendered To | | | |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------|---------------|--------------|-------------------|----------------------|------------------|------------------------------|----------|-------|------|
| Acco | unt Number | VT10236 | | | | Account Number | VT80982 | | | |
| Acco | unt Name | DEMO 1 (| Compliance A | ccount | | Account Name | Control Period 4 Surrender A | ccount | | |
| State | | VT | | | | State | VT | | | |
| Choo: Availa | In the Transferring Account will be transferred. | | | | | | | | | |
| | Allocati | on Year | Туре | Originating State | Serial Rang | e Froz | en Total Allowances A | vailable | Quant | tity |
| V | 2009 | | Standard | NJ | 359855107 - 35985610 | 06 No | 1000 | 10 | 0 | |
| | 2810 | | Standard | NJ | 382747913 - 38274791 | 13 No | 1 | 0 | | |
| | 2011 | | Standard | VT | 607239225 - 60724698 | 35 No | 7761 | 0 | | |
| | 2014 | $\overline{}$ | Standard | ME | 613248376 - 61324837 | 76 No | 1 | 0 | | |
| Bacl | Back Next Check the serial block of allowances you would like to transfer from the Transferring Account to the Acquiring Account. | | | | | | | | | |

www.rggi.org

Step 2: How to provide CO₂ allowances for compliance

5. Review and approve the transaction.

Surrender Allowances: Step 4 - Review and Approve Transaction

Allowances to be Surrendered From Allowances to be Surrendered To Account Number VT10236 Account Number VT80982 Account Name DEMO 1 Compliance Account Account Name Control Period 4 Surrender Account State State VT VT Authorized Account Representative AAR, Vermont Allowances that were selected for transfer in Step 3 via the Automatic or Serial Block Method. Allowances to be Surrendered **Originating State** Serial Range Allocation Year Туре Date Acquired Quantity 2009 Standard NJ 359855107 - 359855206 09/18/2017 100 Total Allowances to be Surrendered 100 Please review the transaction. Click the Submit button to finalize the surrender. Select the appropriate control period for which you Control Period would like the allowance transfer to be credited. Comment Enter Session PIN Generate Session PIN 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 Password ³ Enter COATS password. Back Submit www.rggi.org

Step 2: How to provide CO₂ allowances for compliance

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

| our allowance surrender ha | s been completed. Pl | ease print this page for yo | ur records. Email | confirmatio | n regarding this trans | action will be | e forwarded shortly. | |
|----------------------------|----------------------|-----------------------------|-------------------------------|------------------------------|------------------------|----------------|----------------------------|--|
| Date of Allowance Surrende | r 08/22/2018 | | | | | | | |
| Transaction Date | 08/22/2018 | O h | | | | Print this p | age for your record | |
| Transaction ID | rggi163819 | Check your ema | the transactio | for a system-generated email | | | by using the Frint button. | |
| Fransaction Status | Complete | | commation of the transaction. | | | | | |
| State | VT | | | | | | | |
| llowances to be Surrendere | ed From | | Allow | ances to be | Surrendered To | | | |
| ccount Number | VT10236 | | Acco | unt Numbe | r VT80982 | | | |
| ccount Name | DEMO 1 Con | npliance Account | Acco | ount Name | Control Period 4 Surre | nder Accoun | t | |
| itate | VT | | State | • | VT | | | |
| uthorized Account Repres | entative AAR, Vermon | t | | | | | | |
| llowances Transferred | | | | | | | | |
| Allowance Year | | Allowance Type | | Serial | Range | | Allowance(s) | |
| 09 | Standard | | 359855107 - 359 | 855206 | | 100 | | |
| | | | | | | Total Allowa | nces to be Surrendered | |
| ansaction Status History | | | | | | | | |
| | Date | | | | Transaction Status | | | |
| | | O | | | | | | |

Continue

Step 3: How to conduct draft true-up

 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.

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.

Select a Control Period for a State from the grid via radio button.

Use the filter criteria to fin specific Control Period for State.

| nda ora | Filter Criteria ▼ | | |
|------------|---------------------|-----------------------|---|
| - | State | MA ~ | |
| | Control Period | | ~ |
| | Control Period Type | 3 Year Control Period | ~ |
| | Filter Clear | | |

| | State | Control Period Type | Control Period | Status | Compliance Begin Date | Compliance End Date |
|---------|-------|-----------------------|-------------------------|--------|--------------------------|------------------------|
| 0 | МА | 3 Year Control Period | 01/01/2009 - 12/31/2011 | Final | 01/01/2009 | 12/31/2011 |
| 0 | МА | 3 Year Control Period | 01/01/2012 - 12/31/2014 | Final | 01/01/2012 | 12/31/2014 |
| O | MA | 3 Year Control Period | 01/01/2015 - 12/31/2017 | Final | 01/01/2015 | 12/31/2017 |
| \odot | MA | 3 Year Control Period | 01/01/2018 - 12/31/2020 | Open | 01/01/2018 | 12/31/2020 |

1 - 4 of 4 Process True-Up

> Click the Process True-Up button once you have selected a Control Period for a State and are ready to proceed to the Select Sources for True-Up Processing page.

The Status indicates whether the Control Period for the State is available for true-up processing.

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, or Agent and the results of the last draft (or final) true-up processing performed.

Select Sources for True-Up Processing for MA 01/01/2018 - 12/31/2020

Use the filter criteria to find a specific source.

To select the source(s) for true-up processing, click the box next to each source in the grid, or check the "Select All" box. Next, click the "Process True-Up" button, which will lead to the "Compliance Processing" page.

In order to certify compliance, the AAR or AAAR must select a single source to process draft true-up. Electronic Submission Agents may not certify compliance.

Draft true-up may be run multiple times. The Last Update column in the grid displays the date true-up was last processed for the source.

After processing draft true-up, click on the ORIS Code hyperlink to navigate to the source's Compliance Account Detail page.

The Processing Log hyperlink leads to the Compliance Log page.

Processing Log

Select the source for Process True-Up

| Filter Criteria 🔻 | |
|-----------------------------------|--------|
| Source Name | Demo 1 |
| ORIS Code | |
| State Identifier | |
| Authorized Account Representative | |
| Processing Status | ~ |
| Certified? | ~ |
| Filter Clear | |

| | OF IS Code | Source Name | State Identifier | Authorized Account Representative | CO ₂ Compliance Obligation | Account Holdings | Last Update | Processing Status | Certified? | Paragraph 3 Document | Paragraph (4) (ii) Document |
|----------------------------------|---------------|----------------|---------------------|--------------------------------------|------------------------------------------|---------------------|----------------|-------------------|------------|----------------------------|--------------------------------|
| | 1234 | Demo 1 | 5678 | AAR, MA | | | 1 | | | | |
| Back Process True-Up Export Data | | | | | | | | | | | |

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 CO_2 allowances and CO_2 allowances held in the compliance account at the time of processing.

Compliance Processing

Processing Complete.

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

Demo 1Compliance Account: Account is out of compliance. It does not have sufficient allowances for the quantity of emissions reported. Demo 1Compliance Account: Warning: Emissions have not been reported for every period of the compliance period for which a unit was operational. Demo 1Compliance Account: Warning: Compliance cannot be finalized for this unit until a compliance certification has been submitted.

| Account Name | Account Number | ORIS Code | Unit ID(s) | Total CO ₂ Emissions | Biomass Emissions Deducted | CHP Thermal Output Emissions Deducted | CO ₂ Compliance Obligation | Previously Surrendered for CO ₂ Interim Compliance | AAR Surrendered Allowances | Default Deductions | Total Allowances Deducted | Status | Result |
|---------------------------------|-------------------|--------------|-------------------------------------|------------------------------------|----------------------------------|---------------------------------------------------|---------------------------------------------|---------------------------------------------------------------------------|----------------------------------|-----------------------|---------------------------------|----------|--------------------------------------------------------|
| Demo 1 Compliance Account | MA1234 | 1234 | 4, 5, 6, 7, 81, 82, 93, 94 | 3,652,257 | 0 | 0 | 3,652,257 | 0 | 0 | 687,332 | 687,332 | Complete | Source- Submitted - Emissions > Allowances |

Return to Grid Certify Compliance

Click this button to navigate to the Compliance Certification Report page. The Result column will display "Source-Submitted - Emissions = Allowances" if the draft true-up was successful. If not, it will display "Source-Submitted - Emissions > Allowances", meaning the obligation is greater than the allowances deducted.

www.rggi.org

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 February 1, 2021 and March 1, 2021.
- 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, 2021.
 - 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, 2021.

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 CO_2 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 NJ and 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 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.

Step 5: How to view compliance reports

There will be 2 public compliance data reports in COATS:

- Source-Submitted Compliance Report (March 2, 2021)
 - 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, 2021 and remain available.
- Compliance Summary Report (April 2, 2021):
 - 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 effort by participating states to reduce emissions of carbon dioxide (CO₂), a greenhouse gas that causes climate change.

Question & Answer

- 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 Anna Ngai at RGGI, Inc.: <u>anna.ngai@rggi.org</u>.

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

• RGGI Website

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

• RGGI COATS:

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

• US EPA's Emissions Reporting Requirements

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

Contacts

- For questions related to COATS, please email <u>rggi-coats@csra.com</u>.
- 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 | Christian Wisniewski | Christian.Wisniewski@delaware.gov | (302) 324-2090 |
| ME | Eric Kennedy | Eric.Kennedy@maine.gov | (207) 287-5412 |
| MD | Steve Lang | Steven.Lang@maryland.gov | (410) 537-3944 |
| MA | Bill Lamkin | William.Lamkin@state.ma.us | (978) 694-3294 |
| NH | Joe Fontaine | Joseph.Fontaine@des.nh.gov | (603) 271-6794 |
| NJ | Rupa Deshmukh | Rupa.Deshmukh@dep.nj.gov | (609) 633-0534 |
| NY | Mike Sheehan | Michael.Sheehan@dec.ny.gov | (518) 402-8396 |
| RI | Dena Gonsalves | Dena.Gonsalves@dem.ri.gov | (401) 222-2808 x77017 |
| 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.