



# Module 2b: Account Applications

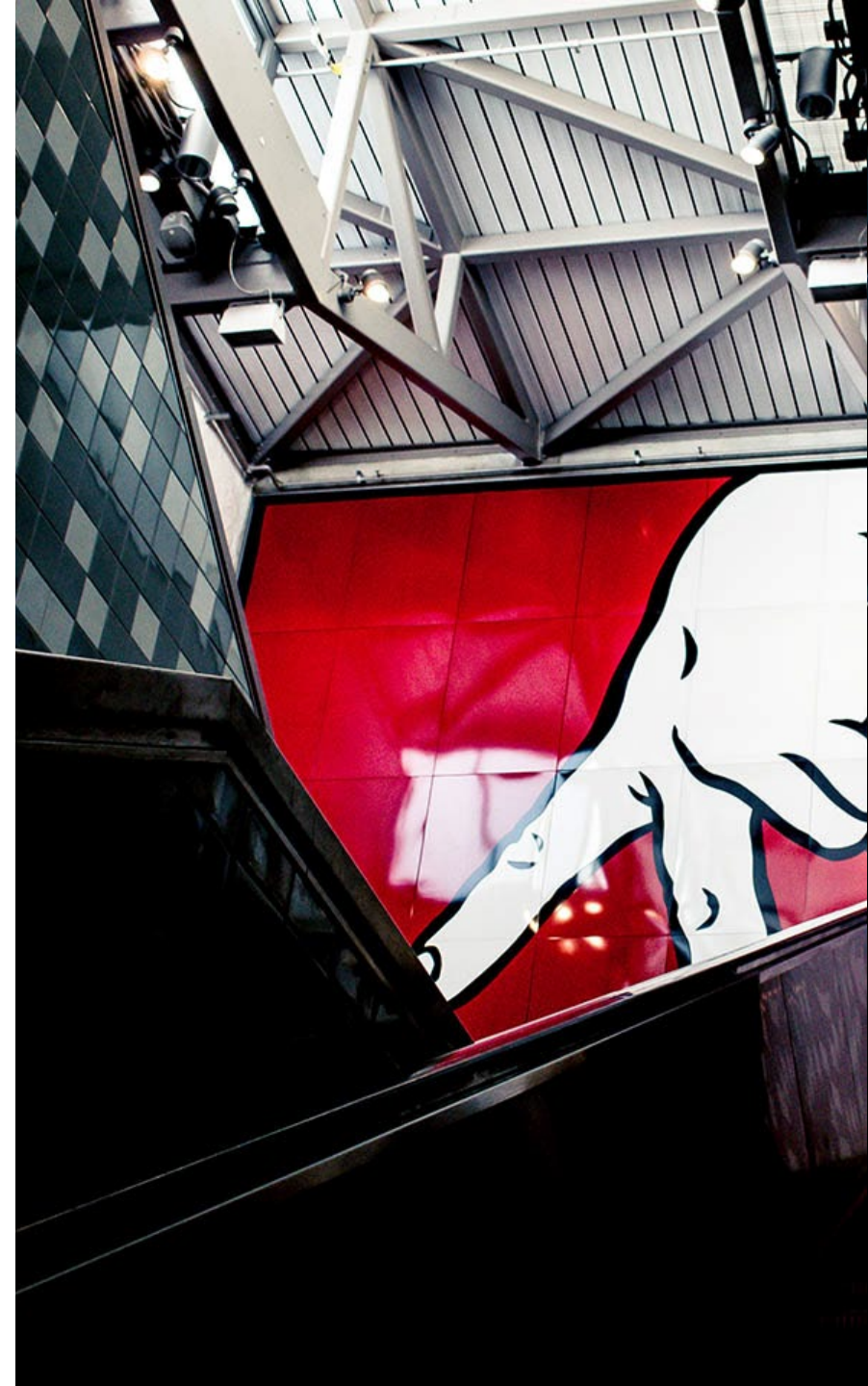
## General Market Participants

October 20<sup>th</sup>, 2022

Publication No. 22-02-063

# Module 1 Agenda

- **Section 1.** Overview
- **Section 2.** CITSS Online Entity Account Application
- **Section 3.** Account Application Forms 1, 2, and 3
- **Section 4.** Signing and submitting forms
- **Section 5.** Ecology Review and Decision
- **Section 6.** Resources
- **Data Security**
- **Contact Information**





# Section 1: Overview

- Entity Accounts in Other Jurisdictions
- Account Application Process
- Entity Types
- Account Types
- Account Representatives
- Entity Account Application Package
- Ecology Review and Deadlines
  
- By the end of this module, you will be able to:
  - Submit online entity account application
  - Submit required forms to Ecology



- Comprehensive Guide for entity account application
- Access from [CCA Auctions and Trading webpage](#).

Washington State Climate Commitment Act

## **CITSS Entity Account Application Guide**

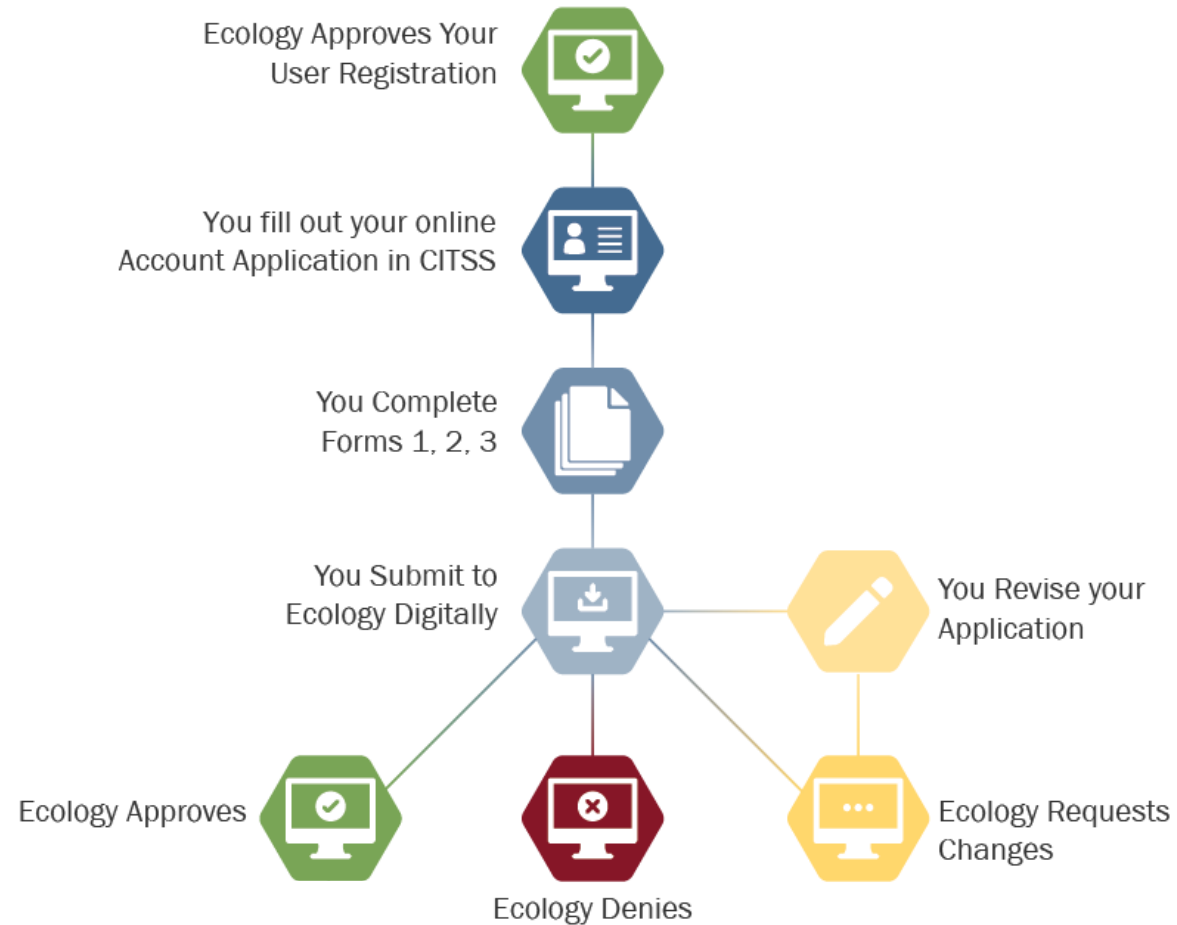
Publication Number 22-02-040



# Entity Accounts in Other Jurisdictions

- Washington's cap-and-invest program is separate from California, Québec, and Nova Scotia.
- New entity account needs to be created for Washington.
- Allowances cannot be transferred between entity accounts in Washington and other jurisdictions.

# Account Application Process



# Entity Types

Entity Type	Participation Requirement	Compliance Obligation	Accounts in CITSS	Facilities in CITSS	Auctions/Sales
General Market Participant (GMP)	Voluntary	No	Holding, LUHA*	No	Auction
Covered	Required	Yes	Holding, Compliance, LUHA*	Yes	Auction, APCR sales, Price Ceiling Sales
Opt-in	Voluntary	Yes	Holding, Compliance, LUHA*	Yes	Auction and APCR sales

\*For electric and natural gas utilities only

# Entity Groupings

- **Corporate Association Groups (CAG)**
  - Multiple entities grouped together due to corporate associations.
  - Ecology will create a CAG for entities in direct corporate association, including those under unified ownership.
  - Required to determine percent shares of purchase and holding limits for each entity in the CAG (unless part of a CEA).
- **Consolidated Entity Accounts (CEA)**
  - Covered and opt-in entities (facilities) that have a direct corporate association with unified ownership.
  - Created by adding multiple facilities to a single entity account in CITSS.
  - Contact [CCAuctions@ecy.wa.gov](mailto:CCAuctions@ecy.wa.gov) for a recording of Module 2a: Covered and Opt-In entities.
- An entity may be a member of a CAG and have a CEA!



# Account Types

- **Holding Account (General Account in CITSS)**
  - Given to all entities.
  - Holds compliance instruments that may be bought at auction, saved for future use, or transferred between Washington CITSS entities.
- **Limited Use Holding Account (LUHA)**
  - Given to electric and natural gas utilities
  - Used for consignment to auction. Cannot be transferred back to holding or compliance account.
- **Compliance Account**
  - Only for covered and opt-in entities to transfer compliance instruments to meet compliance obligations.

Compliance instrument:  
Allowance or offset credit  
issued by Ecology. Equal to  
one metric ton of carbon  
dioxide equivalent.

# Account Representatives

- All entities are required to have:
  - 1 Primary Account Representative (PAR) **and**
- GMP-organization are also required to have:
  - 1 Alternate Account Representative (AAR) (may have 4 total AARs)
  - Recommended to register more than one AAR as many CITSS actions require two users, including trading allowances.
- GMPs do not have a Washington residency requirement

# Entity Account Application Package

- Online CITSS Entity Account Application
- 3 Forms:
  - Form 1 Account Application Checklist (for your reference)
  - Form 2 Account Application with Attestations Form
  - Form 3 Corporate Associations and Structure Disclosure Form
- Submit forms through DocuSign, Box.com, or email [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov)



# Ecology Review and Deadlines

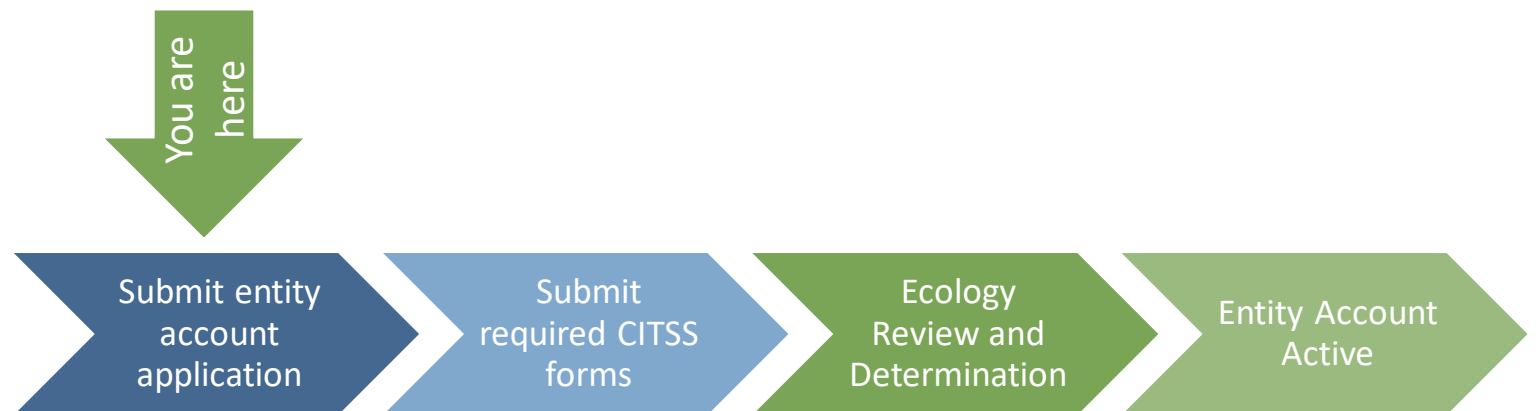
- No registration deadline for GMPs.
- You will not be able to access entity accounts in CITSS until Ecology has received, reviewed, and approved your Entity Account Application Package.
  - Allow a minimum of 2 weeks for Ecology to make a decision (longer wait times expected winter of 2022).
- User and entity accounts must be active before submitting an auction application. Auction applications are due 30 days prior to an auction for covered and opt-in entities.

To participate in the February 2023 allowance auction: submit entity account application package ASAP



# Section 2: CITSS Online Entity Account Application

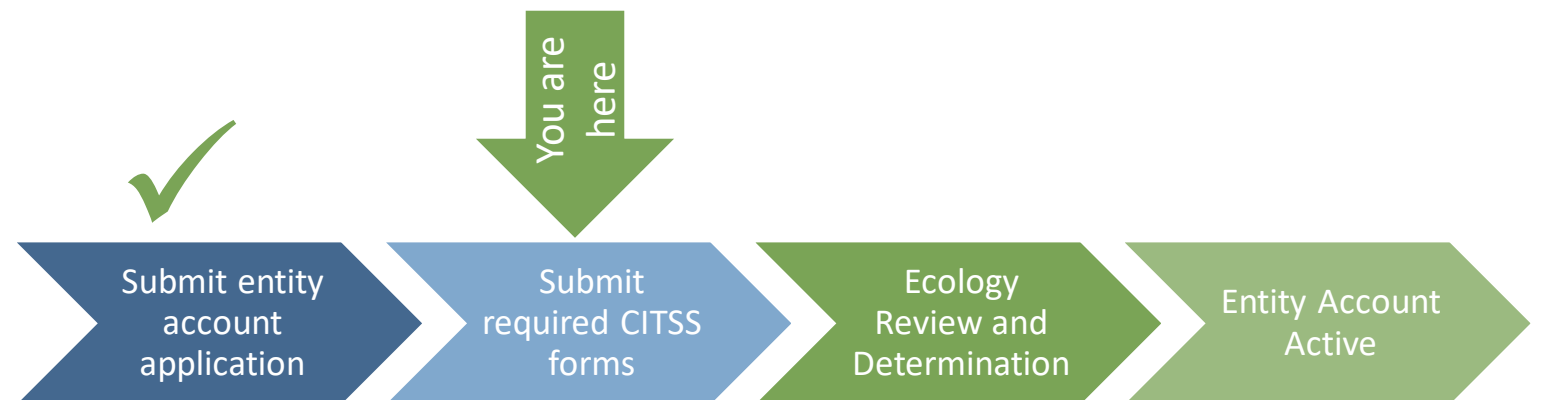
- The online registration process begins at [www.wci-citss.org](http://www.wci-citss.org)
- Sign in and select account registration from the left menu to begin.
- Must have an active user account in CITSS for at least 2 account representatives before starting your application.





# Section 3: Forms 1, 2, and 3

- Form 1: Account Application Checklist
- Form 2: Account Application with Attestations Form
- Form 3: Corporate Associations and Structure Form
- **Do not close the CITSS Account Application Submitted page until you have downloaded all three forms.**



# Form 1: Account Application Checklist

- Provided for your reference, you **do not** need to submit this form
- Guidance for:
  - Information needed to complete your Entity Account Application Package
  - Submitting forms to Ecology

# Form 2: Account Application with Attestations Form

- Generated by CITSS with the entity information you entered in CITSS.
- Your unique CITSS Entity ID is listed at the top of the form.
- Tribal governments should contact Ecology by emailing [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov) for a version of Form 2 that includes attestations specific to Tribal governments.

# Form 2: Account Application with Attestations Form

- Section 1
  - Pre-populated from CITSS
  - If you checked "Facility is in CITSS": complete the Facility identification section.
- Section 2
  - Indicate if the PAR or AAR has a primary residence in Washington.
  - If not, enter registered agent information.
- Section 3
  - Confirm that the PAR name and user reference code are accurate.
  - Read the attestation for being a PAR. Enter name, date, employer name, title, and sign.
- Section 4
  - Confirm that the AAR name and user reference code are accurate.
  - Read the attestation for being an AAR. Enter name, date, employer name, title, and sign.
- Section 5
  - Completed by a Director or Officer of the entity. Enter their name, date, employer name, title, and sign.
- Sign and submit entire form to Ecology

# Form 3: Corporate Associations and Structure Disclosures Form

- Use form to submit required information to Ecology on
  - corporate associations, including Consolidated Entity Accounts (CEAs)
  - cap-and-invest consultants and advisors, and
  - employees with knowledge of market position
- Also used to submit updates to information to Ecology



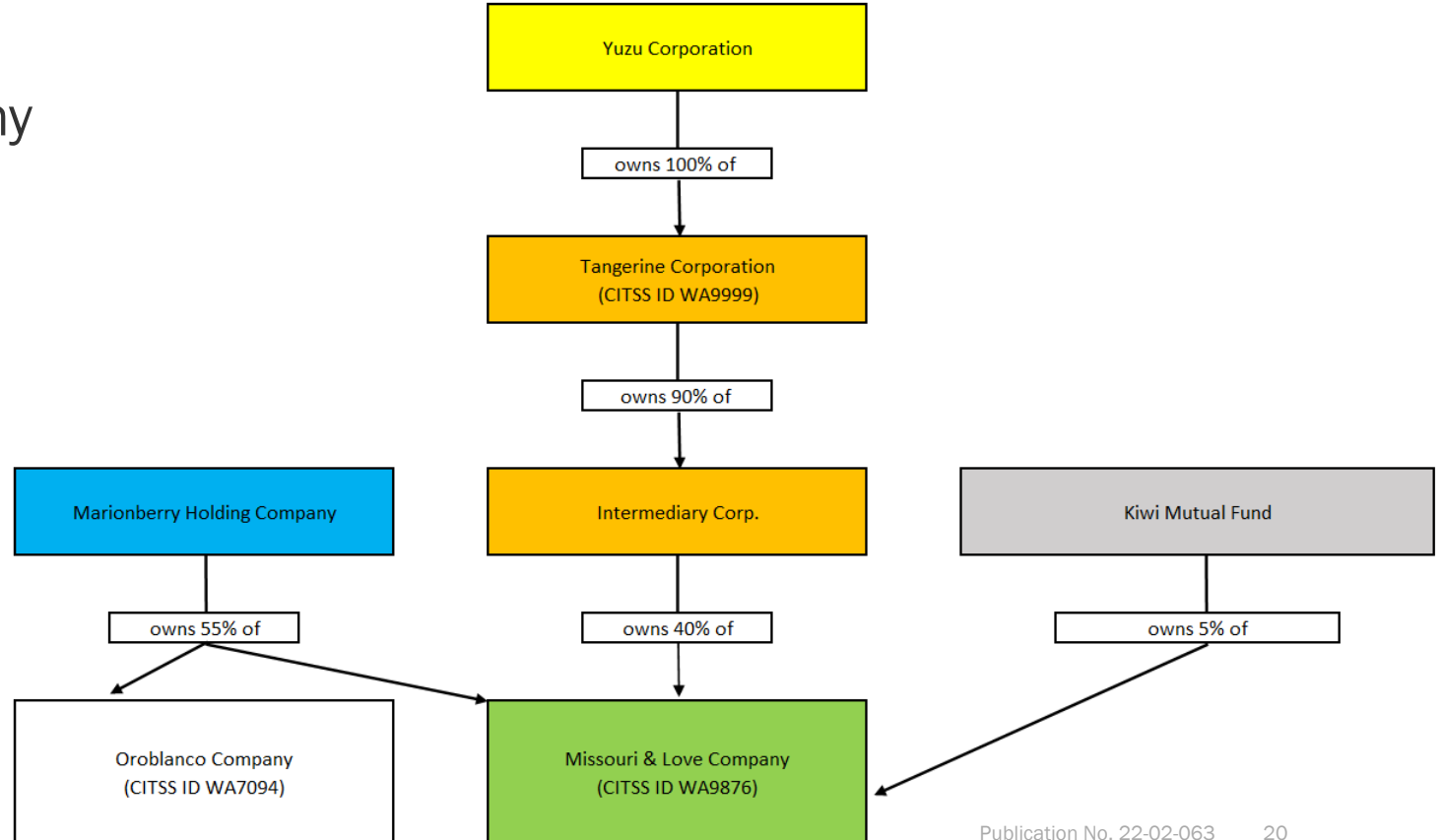
# Direct and Indirect Corporate Associations

Indicia of Control	Direct Corporate Association	Indirect Corporate Association
Percent of ownership of any class of listed shares, the right to acquire such shares, or any option to purchase such shares of the other party	> 50%	> 20% and ≤ 50%
Percent of common owners, directors, or officers of the other party	> 50%	> 20% and ≤ 50%
Percent of the voting power of the other party	> 50%	> 20% and ≤ 50%
In the case of a partnership other than a limited partnership, percent of the interests of the partnership	> 50%	> 20% and ≤ 50%
In the case of a limited partnership, the percent of control over the general partner or the percent of the voting rights to select the general partner	> 50%	> 20% and ≤ 50%
In the case of a limited liability corporation, percent of ownership in the other party regardless of how the interest is held	> 50%	> 20% and ≤ 50%
The controlling party's percentage of ownership	> 50%	> 20% and ≤ 50%

*This list is not comprehensive. Refer to the [guide](#) for additional information.*

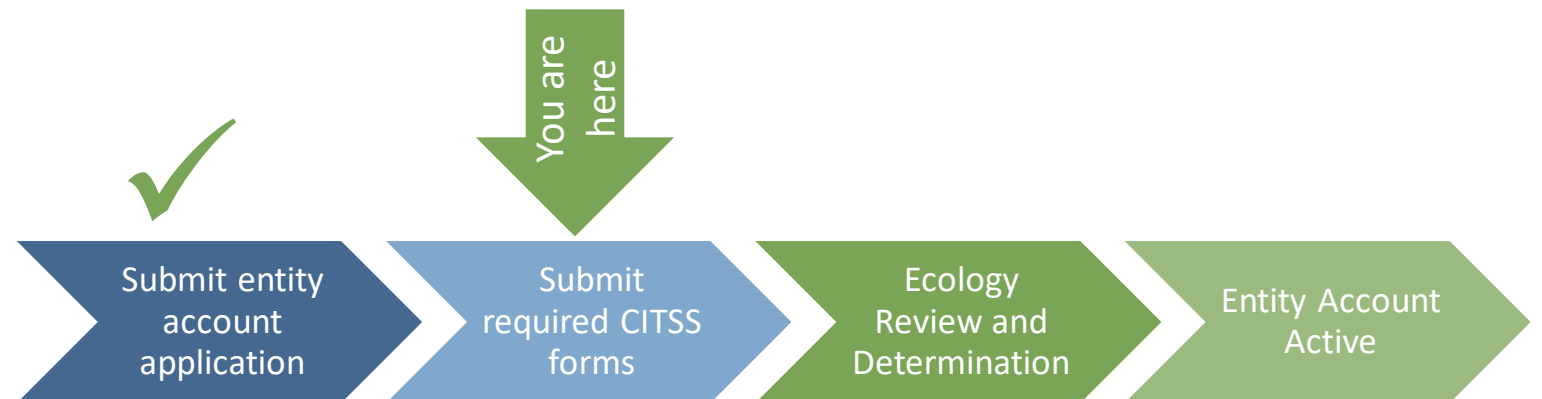
# Form 3: Corporate Associations and Structure Disclosures Form

- Example: Missouri & Love Company
  - Some corporate associates also registered in CITSS.



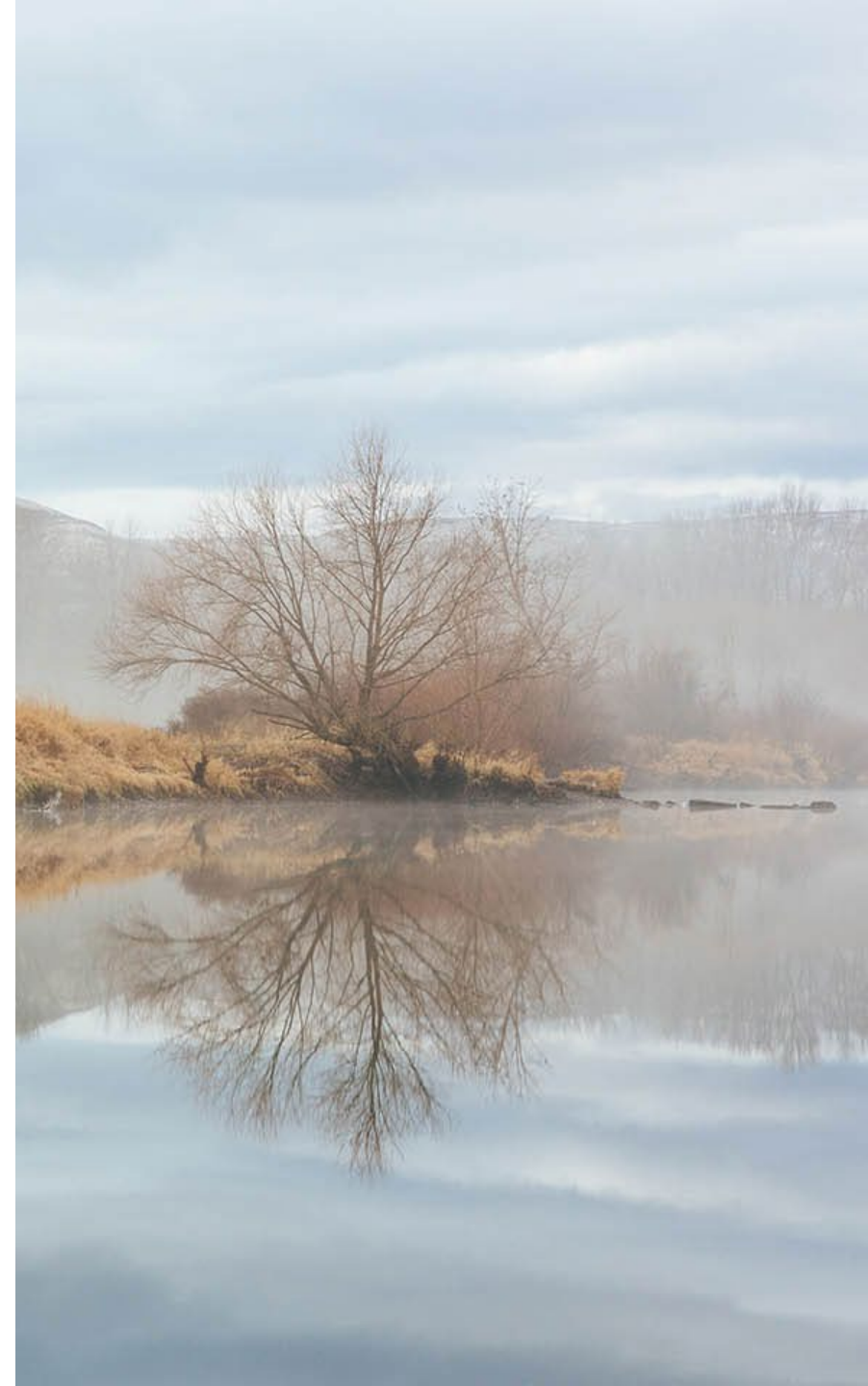
# Section 4: Signing and Submitting Forms

- Acceptable Signature Types
  - Electronic/Digital
  - Print and Scan
- Acceptable File Formats
- Acceptable Submission Methods
  - DocuSign, box, e-mail



# Acceptable Submission Methods

- Ecology recommends DocuSign
- Other acceptable methods:
  - Box Submission
  - Email to [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov)

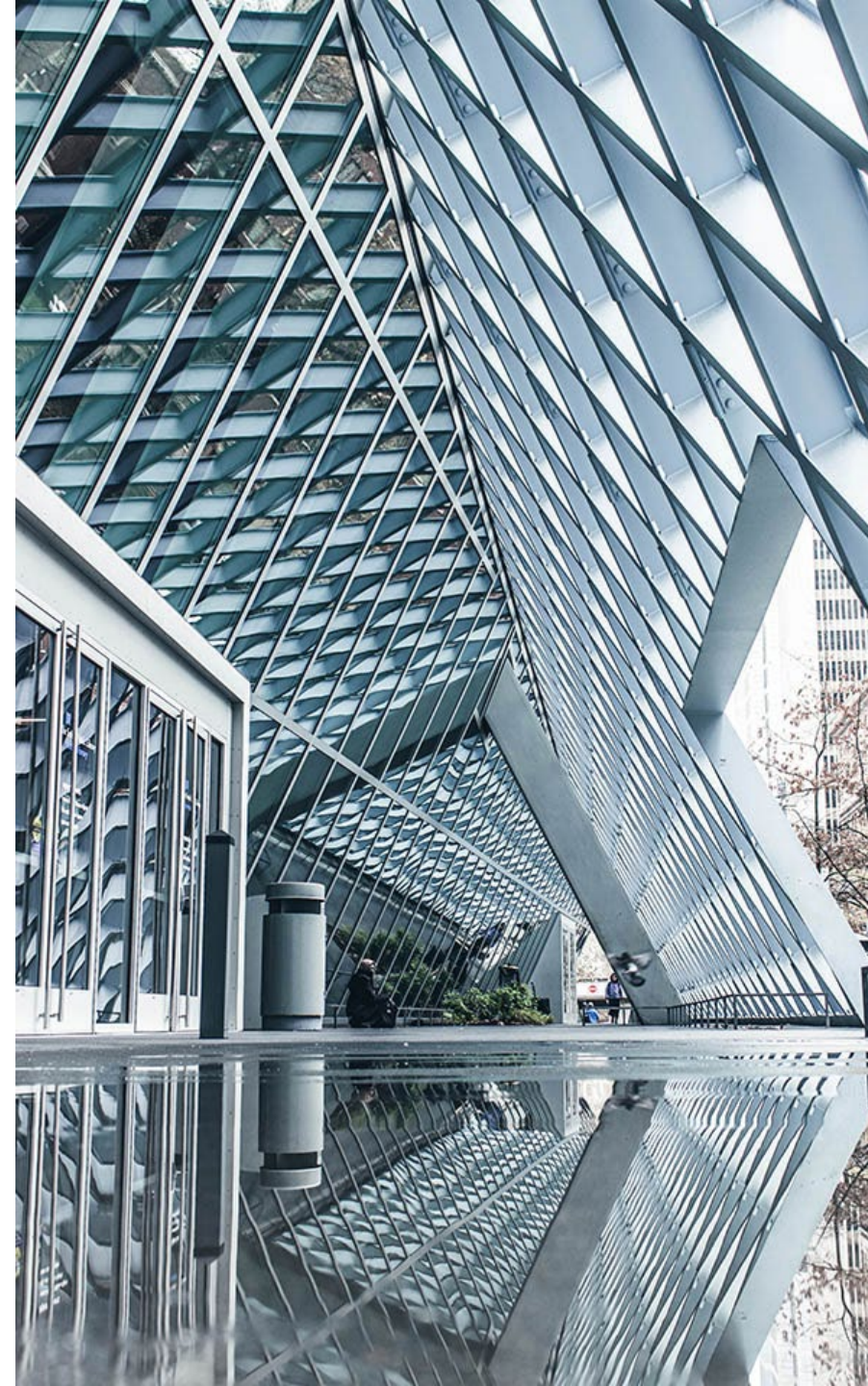




# Acceptable File Formats

- We encourage you to fill out forms electronically. Forms completed by hand may create delays due to legibility.
- DocuSign lets you fill out and sign forms electronically.
- Acceptable formats for forms submitted via Box and email include:
  - A form that is completed and signed electronically and submitted as a pdf (or as the same file type as the original).
  - A form that is printed, completed and/or signed in hard copy, scanned, and saved as pdf.
- Ecology **will not** accept photos or image files of completed forms.

Include your **CITSS ENTITY ID** in the filename.



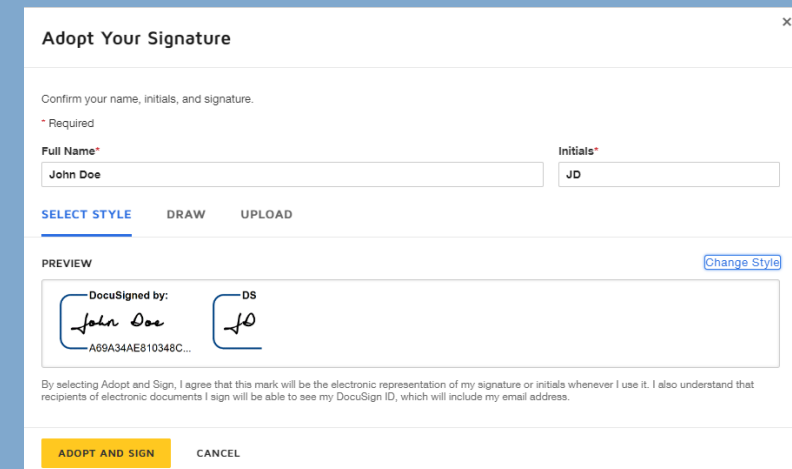
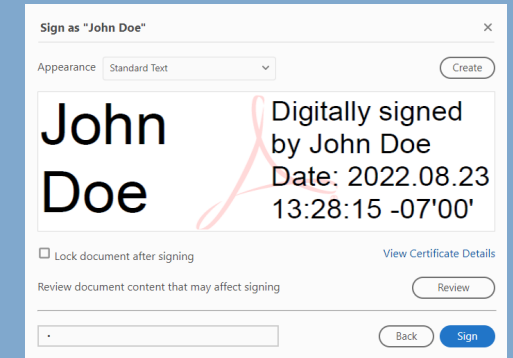
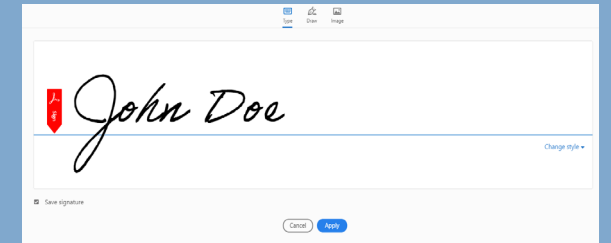


# Acceptable Signature Types

- Electronic/Digital
  - Option 1: **Digitized Signature** - TIFF, PNG, or JPG of your signature.
    - Create using the Fill and Sign tool in Adobe Acrobat or [adobe online](#), or from a scanned image of a signature.
  - Option 2: **Digital Signature** - digital version of your signature with a signing key.
    - Create in Adobe Acrobat Certificates tool or in DocuSign.
- Print & Scan
  - Print, sign, and scan forms to your computer.



John Doe



# DocuSign

- Entirely digital and secure signing and submitting experience
- Checks that you've completed all required fields
- Can route forms to multiple signers
- To request DocuSign for your forms:
  - After submitting your entity account application, email [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov) to request Ecology to send your forms to complete and sign through DocuSign.
  - Include your **CITSS ENTITY ID** in the email, which can be found on the Account Application Submitted screen or on Form 2: Account Application Form.
- You do not need a DocuSign subscription to complete your forms through DocuSign.

Section 3.0 Primary Account Representative (PAR) Attestation

CITSS Entity ID WA4376

PAR Information:

Last Name Wilson

First Name Ann

User Reference Code RFYGP9TB4XCT06

1. I certify under penalty of perjury under the laws of the state of Washington that I am authorized to make this submission on behalf of the party that owns the compliance instruments held in the account. I certify under penalty of perjury under the laws of the state of Washington 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 under penalty of perjury under the laws of the state of Washington that the statements and information submitted to Ecology are true, accurate, and complete. I consent to the jurisdiction of Washington state, its courts, and the pollution control hearings board for purposes of enforcement of the laws, rules, and regulations pertaining to chapters 173-446 WAC and 70A.65 RCW. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.



2. I certify under penalty of perjury under the laws of the state of Washington that I was selected as the primary account representative or an alternate account representative, as applicable, by an agreement that is binding on all parties who have an ownership interest with respect to compliance instruments held in the account. I certify that I have all the necessary authority to carry out the duties and responsibilities contained in chapters 70A.65 RCW and 173-446 WAC on behalf of such parties and that each such party shall be fully bound by my representations, actions, inactions, or submissions to the pollution control hearings board regarding the account.

Print Name: John Doe

Date: 10/17/2022

Employer Name:

Title:

Signature:   

Adopt Your Signature



Confirm your name, initials, and signature.

\* Required

Full Name\*  Initials\*

SELECT STYLE DRAW UPLOAD

PREVIEW [Change Style](#)

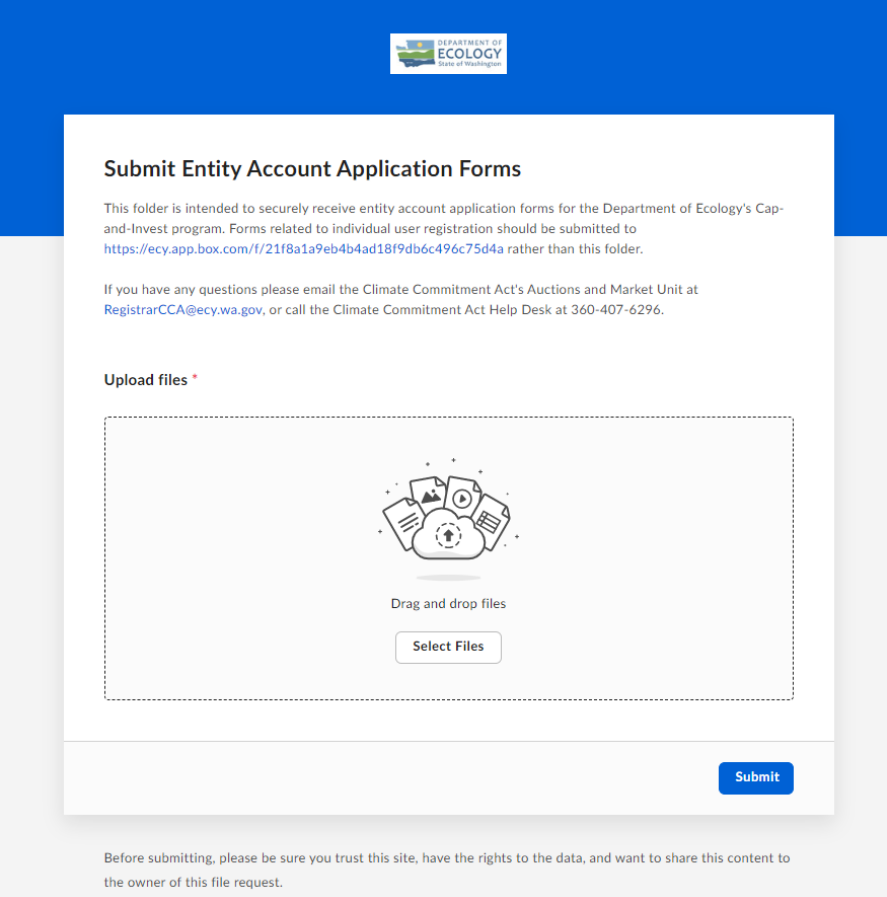
DocuSigned by:    
835C0F1E82634F9

By selecting Adopt and Sign, I agree that the signature and initials will be the electronic representation of my signature and initials for all purposes when I (or my agent) use them on documents, including legally binding contracts - just the same as a pen-and-paper signature or initial.

ADOPT AND SIGN CANCEL

# Box Submission

- Submit your forms to Box
  - You can access the appropriate link for your entity account application forms on the Account Application Checklist.
  - Include your **CITSS ENTITY ID** in the filename.
  - You can upload multiple files.
- Box does not offer signature services
  - You will need to sign your forms separately and upload to Box as PDFs



The screenshot shows a web interface for submitting forms. At the top right is the logo for the Department of Ecology, State of Washington. The main heading is "Submit Entity Account Application Forms". Below this, there is a paragraph of text explaining the folder's purpose and providing a specific Box link. A second paragraph offers contact information for questions. The form area is titled "Upload files\*" and contains a dashed box with an icon of a folder and files, the text "Drag and drop files", and a "Select Files" button. At the bottom right of the form area is a blue "Submit" button. A disclaimer at the very bottom states: "Before submitting, please be sure you trust this site, have the rights to the data, and want to share this content to the owner of this file request."

DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## Submit Entity Account Application Forms

This folder is intended to securely receive entity account application forms for the Department of Ecology's Cap-and-Invest program. Forms related to individual user registration should be submitted to <https://ecy.app.box.com/f/21f8a1a9eb4b4ad18f9db6c496c75d4a> rather than this folder.

If you have any questions please email the Climate Commitment Act's Auctions and Market Unit at [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov), or call the Climate Commitment Act Help Desk at 360-407-6296.

Upload files \*

Drag and drop files

Select Files

Submit

Before submitting, please be sure you trust this site, have the rights to the data, and want to share this content to the owner of this file request.

# Email

- Only send forms to [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov).
- We recommend you encrypt your emails.
- Encryption provides security when sending sensitive information through email.
- You may also opt to password protect your email and/or attachments when emailing documents to Ecology
  - After sending the email, call the CCA help desk to provide the password: 360-407-6296
- Discuss available encryption and password protection options with your IT department.

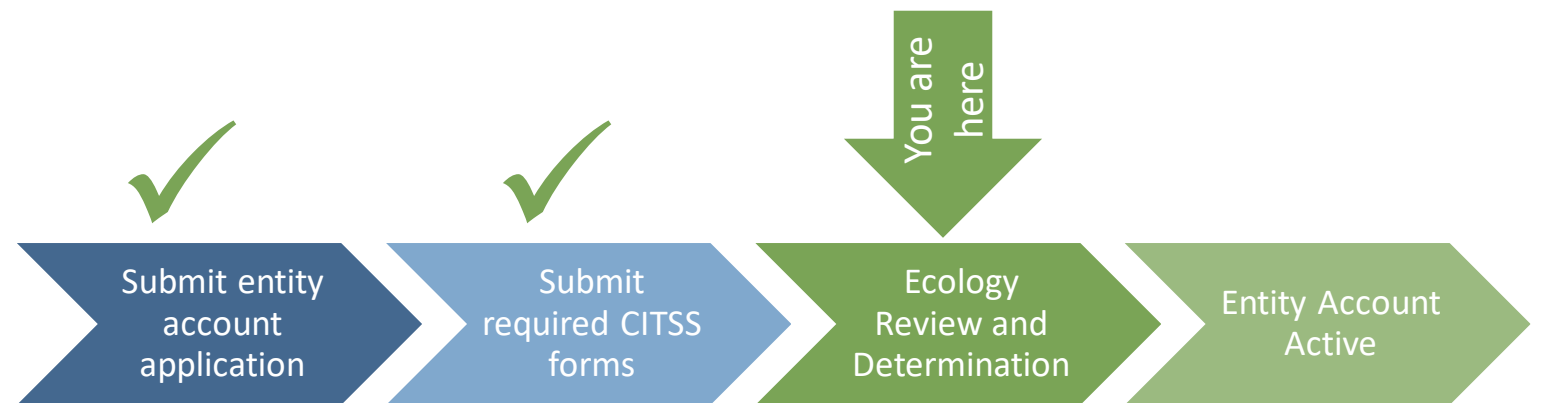
Do not send forms to individual Ecology staff or to the CCA Auctions mailbox!





# Section 5: Ecology Review and Decision

- Review process
- Timeline





# Review Process



# Timeline

- Allow 2 weeks minimum of process time for applications from date Ecology receives materials.
  - Winter 2022, influx of applications. Processing may take longer.
- If you have questions or concerns, contact Ecology at [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov)



# Section 6: Resources

## Forms:

- [Form 1: CITSS Entity Account Application Checklist](#)
- [Form 2: CITSS Account Application with Attestations Form](#)  
*(example only, generated in CITSS)*
- [Form 3: CITSS Corporate Associations and Structure Disclosure Form](#)

## Guides:

- [Entity Account Application Guide](#)
- [Guide for Corporate Associations and Structure Disclosure Form](#)
- [New User Registration & User Profile Management Guide](#)

## Website:

- [Auctions and trading webpage](#)

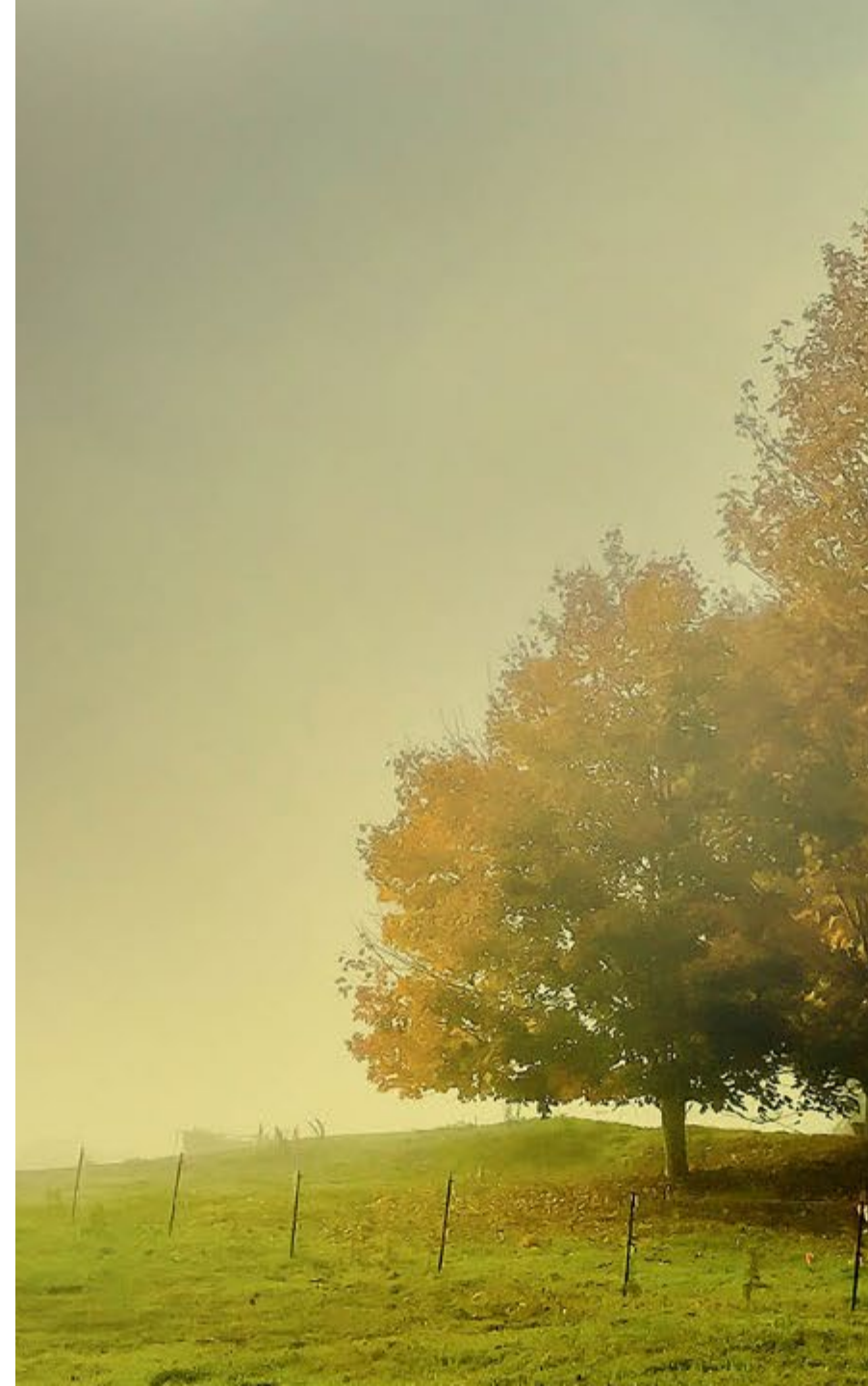


# Upcoming Trainings

## Auctions Training

- Early December 2022
- Sign up [for Auctions and Trading email alerts](#) to get training announcements.

All trainings will be recorded and shared on the [CCA auctions and trading webpage](#).





# Data Security

- How We Handle Your Sensitive Data
- Methods of Submitting Your Information



# How We Handle Your Sensitive Data

- The information you submit to us is treated as confidential and sensitive.
- It is protected from disclosure, by law.
- It is encrypted when stored.
- It is only accessible by...
  - Staff with a need-to-know
  - Staff who have passed a background check
- DocuSign, Box, and the Registrar email are all approved for receiving this type of information.

# Methods for submitting

- DocuSign
  - **Highly** recommended for speed and security reasons
  - Ensures all form fields are completed before submitting
- Box
  - Works like the key drop at a car rental
  - No one, not even you, can see your submission after you make it
- Email to [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov)
  - **We recommend you encrypt your message**
  - You can also password protect your file, and call us with the password



# Contact Information

- [RegistrarCCA@ecy.wa.gov](mailto:RegistrarCCA@ecy.wa.gov)
  - Submitting information/forms to Ecology
  - Secure mailbox
- [CCAuctions@ecy.wa.gov](mailto:CCAuctions@ecy.wa.gov)
  - General questions
  - Do not submit registration information to this mailbox
- Auctions and trading helpdesk phone: 360-407-6296
  - M – F, 9am – 4pm PT

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6800 or email Melanie Forster at [melanie.forster@ecy.wa.gov](mailto:melanie.forster@ecy.wa.gov), or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.