

Washington State Climate Commitment Act

CITSS Compliance Instrument Transfer Guide

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Contents

CITSS Compliance Instrument Transfer Guide	1
Introduction	2
Entity Accounts	3
Overview of the Transfer Process	4
Naming Conventions	5
Account Numbers and Entity Reference Codes	5
Transferring allowances within an entity’s own accounts or to Jurisdiction Accounts	6
Transferring allowances to another entity	8
Transfer Statuses	9
Transfer Proposals	11
Selecting Instruments to Transfer	11
Transfer Types	13
Transfer Type Detail	14
Transfer Approval	34
Transfer Acceptance	38
Transfer History	42
Transfer History for All Accounts	42
Transfer History for One Account	44
Transfer Details	45
Resources	47
Appendices	47
Appendix A – Access to CITSS	47
Acknowledgments	47

The information in this document is based on the requirements set forth in the Climate Commitment Act (CCA), Chapter 70A.65 RCW, and the CCA Program Rule, Chapter 173-446 WAC (collectively referred to as CCA Requirements). If there is any apparent conflict between this document and the CCA Requirements, the CCA Requirements shall control.

Initialisms and Acronyms

AVA	Account Viewing Agent
AAR	Alternate Account Representative
PAR	Primary Account Representative
CCA	Climate Commitment Act
CITSS	Compliance Instrument Tracking System Service
WCI, Inc	Western Climate Initiative, Inc
Participant	Participating natural person or legal entity
Covered Entity	Any entity or facility covered under WAC 173-446 of the Climate Commitment Act required to participate in the cap-and-invest program
Opt-In Entity	An entity with emissions in Washington State that is not required to participate in the program.
GMP	General Market Participant
Rule	Rule respecting the cap-and-invest program for greenhouse gas emissions allowances

Introduction

The Compliance Instrument Tracking System Service (CITSS) Compliance Instrument Transfer Guide assists entities in transferring compliance instruments (allowances or offset credits) between their own accounts, other Washington-registered entities' accounts and Jurisdiction Auction and Allocation accounts.

This manual is fourth in a series of CITSS guidance published by Ecology:

1. [CITSS New User Registration and User Profile Management Guide](#)
2. [CITSS Entity Account Application Guide](#)
3. CITSS Entity Account Management Guide
4. CITSS Entity Transfers Guide

Additional guidance and updated versions of publications will be made available on the [Auctions and Market Trainings and Resources Webpage](#).

QUESTION:

“Can I transfer allowances from my Washington entity to an entity in another Emissions Trading System (ETS)?”

ANSWER:

No, you cannot transfer allowances between entity accounts in Washington and other jurisdictions. The Washington cap-and-invest program is separate from California’s cap-and-trade program and the cap-and-trade system of Québec (which are linked), and the Nova Scotia cap-and-trade program (which is not linked with another jurisdiction).

Entity Accounts

There are three types of entity accounts in CITSS: Holding (general) Accounts, Compliance Accounts, and Limited Use Holding Accounts (LUHAs).

Holding (general) Account

Each entity has a Holding Account. Transfers of allowances to other entities takes place between Holding Accounts. Allocation of no-cost allowances to Emissions Intensive Trade Exposed (EITE) entities and electric utilities are placed into the entity’s Holding Account.

Compliance Account

Compliance Accounts are only assigned to Covered and Opt-In entities. The Compliance Account is used to surrender instruments to meet a compliance obligation. **Once instruments are placed into the compliance account, they can no longer be traded, sold, or consigned to auction.**

Ecology will place a specified percentage of no-cost allowances into the Compliance Account of natural gas utilities at the discretion of the entity.

Limited Use Holding Account (LUHA)

Limited Use Holding Accounts (LUHA) are assigned to eligible Electric and Natural Gas utilities. No-cost allowances to Natural Gas utilities are placed into the LUHA. Once allowances are placed in to the LUHA, they can no longer be removed. From the LUHA, allowances can only be transferred to the Jurisdiction Auction Account for consignment.

Ecology will place a specified percentage of no-cost allowances into the LUHA of natural gas utilities at the discretion of the entity.

Overview of the Transfer Process

Entities can conduct three types of transfers:

1. Internal transfers between their own accounts (Figure 3);
2. Transfers from their accounts to Washington Jurisdiction Accounts (Figure 3); and
3. Transfers to other entities (Figure 4).

Figure 1: Internal transfers and transfers to jurisdiction accounts¹.

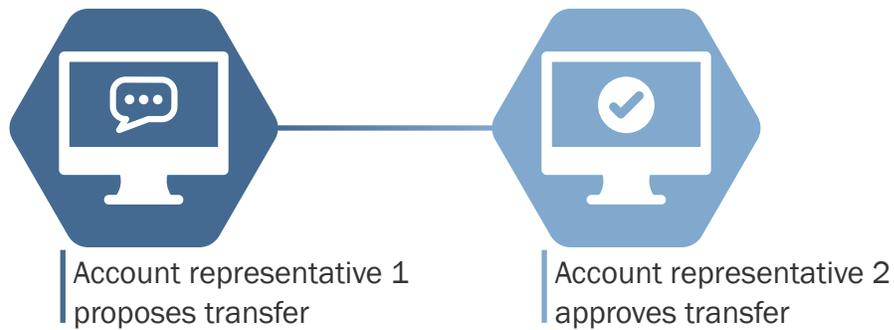
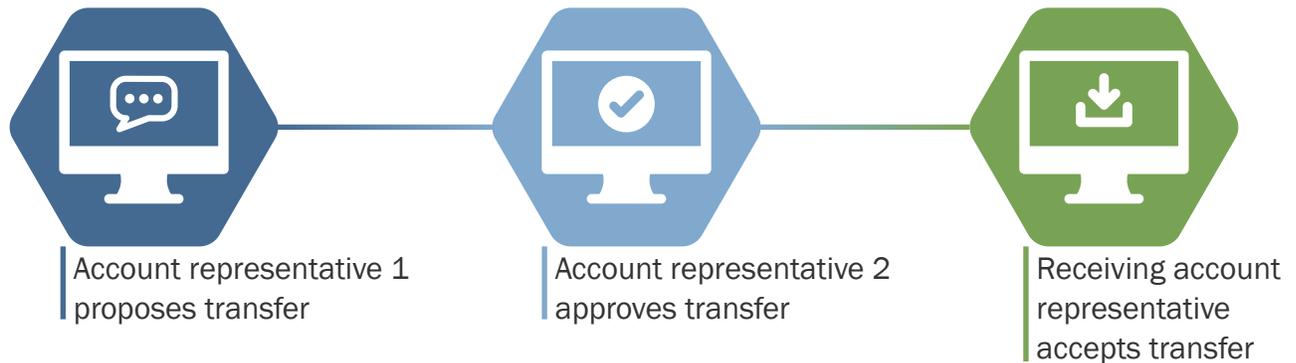


Figure 2: Transfers between entity general accounts



¹Transfers to the Jurisdiction Retirement account for voluntary retirement require acceptance by the Jurisdiction for the transfer to be complete.

Naming Conventions

Sending entity The entity proposing the transfer of compliance instruments.

Receiving entity The entity receiving the proposed allowances of compliance instruments (aka the beneficiary of the transfer).

Agreement Date The date a contract or agreement to transfer emission allowances is accepted by the parties involved. It is the date a contract is signed. The agreement date and transaction date may be different.

Transaction Date The expected date when the terms of the agreement will be complete. This is typically the date of transfer of compliance instruments and payment.

Contract Expiration Date The date the contract expires for transfers resulting from futures markets or other transaction services. It is the same date when the price for the emission allowance transfer is established.

Account Numbers and Entity Reference Codes

To transfer to other entities, sending entities must have the receiving entity's General Account Number and Entity Reference Code. Account Numbers are available on the User Homepage in the MY ACCOUNTS box in the ACCOUNT NUMBER column.

Note

Your account number begins with "WA."

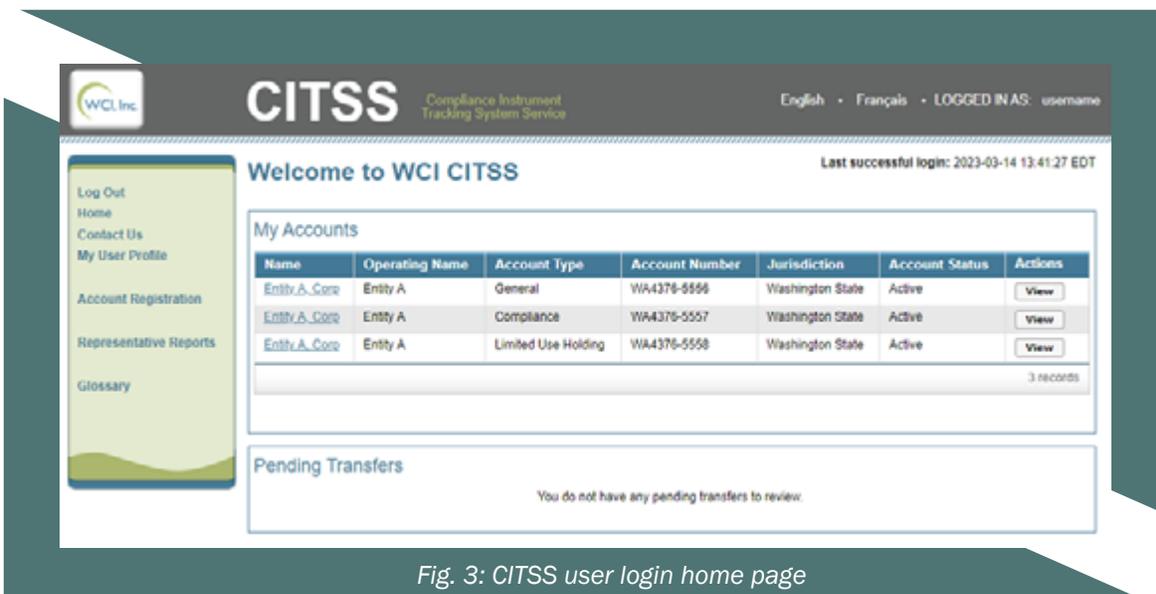


Fig. 3: CITSS user login home page

Your Entity Reference Code is in the General Tab on the Account Detail page. Select the hyperlinked **ENTITY NAME** in the **NAME** column to access the Account Detail Page.

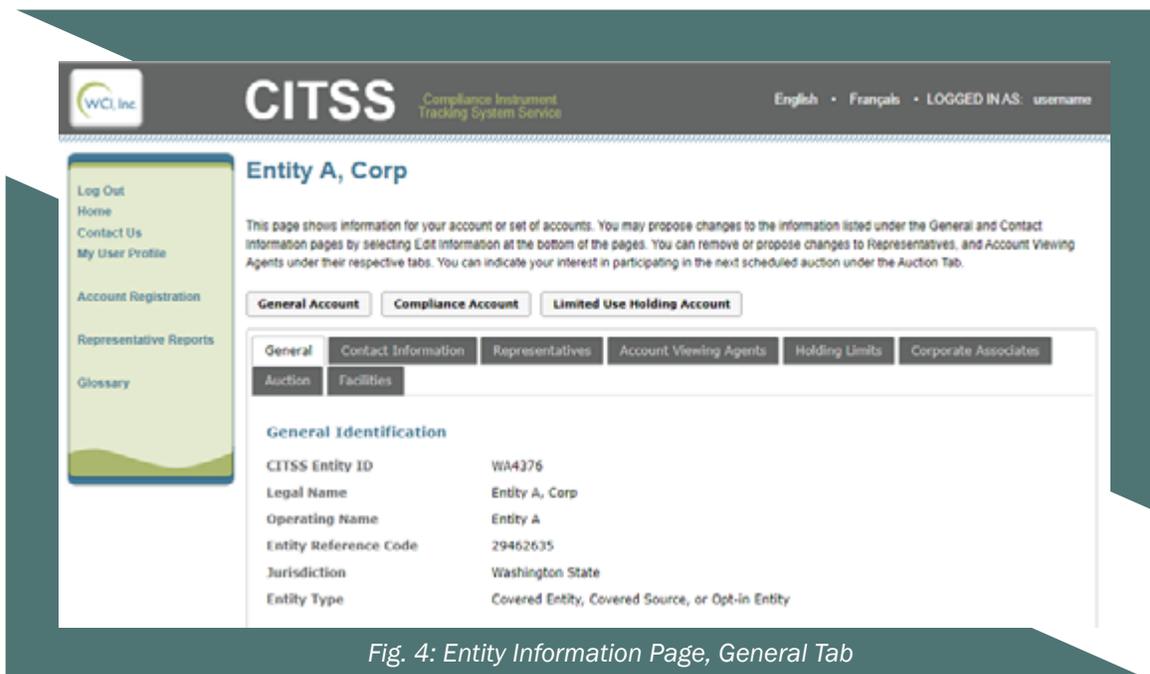


Fig. 4: Entity Information Page, General Tab

Transferring allowances within an entity's own accounts or to Jurisdiction Accounts

There are some situations where an entity will transfer instruments within their own accounts. Transferring emissions allowances to an entity's own compliance account or LUHA, or to the Jurisdiction Auction Account for consignment must occur within a specific timeframe in CITSS:

- Step 1.** An account representative proposes transfer of allowances between accounts.
- Step 2.** Another account representative approves the transfer no later than 2 calendar days after it is proposed by 11:59 pm ET.

If the transfer is not accepted by the second account representative of the sending entity within the above timeframe, the transfer will expire, and the emissions allowances will not transfer. An AAR or PAR can propose the transfer again to reinitiate the process.

Table 1: Visualization of transfer timeline within an entity's own accounts or to Jurisdiction Accounts²

Step	Responsible Party	Day 0	Day 1	Day 2
1	Sending Entity Representative 1	Transfer Proposed	-	-
2	Sending Entity Representative 2	Approval Window closes 11:59pm ET on Day 2		

EXAMPLE (Internal):

John and Jane are account representatives for the same entity.

John proposes a transfer from the Holding Account to the Compliance Account on January 1 (DAY 0). Jane must approve the proposed transfer no later than January 3rd at 11:59 pm Eastern Time (DAY 2). Jane approves the transfer before the deadline.

The transfer is now complete, and the instruments have been transferred from the Holding Account to the Compliance Account.

EXAMPLE (to Jurisdiction):

John and Jane are account representatives for Entity A.

John proposes a transfer from the Limited Use Holding Account (LUHA) to the Washington State Jurisdiction Auction Account on January 1 (DAY 0). Jane must approve the proposed transfer no later than January 3rd at 11:59 pm Eastern Time (DAY 2). Jane approves the transfer before the deadline.

The transfer is now complete, and the instruments have been transferred from the LUHA to the Washington Jurisdiction Auction account for consignment.

The proposed allowances will be subtracted from the sending's account balance to reflect a transfer in progress.

Account representatives may approve transfers sooner than two days after proposal. There is no penalty for completing transfers earlier than the deadline to approve them.

² Entity transfers to the Jurisdiction Retirement account do require acceptance by the Jurisdiction

Transferring allowances to another entity

Entities may transfer allowances between their Holding account and another Washington-registered entity's Holding Account. Transferring emissions allowances to another entity (three-step) must occur within a specific timeframe in CITSS:

- Step 1:** An account representative from the sending entity proposes the transfer.
- Step 2:** A second account representative from the sending entity approves the transfer no later than 2 calendar days after it is proposed by 11:59 pm ET.
- Step 3:** An account representative from the receiving entity accepts the transfer no later than 3 calendar days after it is proposed by 11:59 pm ET.

If the transfer is not accepted by the receiving within the above timeframe, the transfer will expire, and the emissions allowances will not transfer. An AAR or PAR must propose the transfer to reinitiate the process again.

Table 2: Visualization of transfer timeline between two entities

Step	Responsible Party	Day 0	Day 1	Day 2	Day 3
1	Sending Entity Representative 1	Transfer Proposed	-	-	-
2	Sending Entity Representative 2	Approval Window closes 11:59pm ET on Day 2			-
3	Receiving Entity Representative	Acceptance Window closes at 11:59pm on Day 3			

EXAMPLE:

John and Jane are account representatives for Entity A. Mark and Molly are account representatives for Entity B.

John proposes a transfer from Entity A to Entity B on January 1 (DAY 0). Jane must approve the proposed transfer no later than January 3rd at 11:59pm Eastern Time (DAY 2). Jane approves the transfer before the deadline.

Mark **or** Molly must accept the transfer from Entity A no later than January 4th at 11:59pm (DAY 3). Mark is out of office on vacation, so Molly accepts the transfer before the deadline

The transfer is now complete, and the instruments have been transferred from Entity A to Entity B.

Compliance instruments remain the property of the sending entity until the transfer status is Complete in CITSS in the account transfer history and the transfer history report. The proposed allowances will be subtracted from the sending entity’s account balance to reflect a transfer in progress.

CITSS is based on Eastern Time (ET). A “day” begins at 12:00am ET and ends at 11:59pm ET. Day 1 is 24 hours after the transfer has been proposed or the Settlement Date of a contract agreement.

Transfers may be completed sooner than the maximum three-day timeframe. There is no penalty to completing transfers earlier. If the transfer expires, account representatives can propose another transfer at any time.

Transfer Statuses

Transfer Statuses display in transfers records, which can be found in the Transfer History Report for all your entity accounts and in the Transfer History for each respective entity account. They are the third column in Fig. 5.

Transfer ID	Event Date	Status	Transfer Type	Transferring Account Name	Transferring Account Type	Receiving Account Name	Receiving Account Type	Quantity
153634	2023-02-11 00:01:01 EST	Expired	General - Exchange	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153635	2023-02-11 00:01:01 EST	Expired	Compliance	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5557)	Compliance	5,000
153636	2023-02-11 00:01:01 EST	Expired	Limited Use Holding	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5558)	Limited Use Holding	5,000
153637	2023-02-11 00:01:01 EST	Expired	Voluntary Retirement	Entity A, Corp (WA4376-5556)	General	Washington State (WAJ985-984)	Retirement	5,000
153633	2023-02-11 00:01:01 EST	Expired	General - OTC > 3 Days/Multiple/Combined	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153632	2023-02-08 17:03:06 EST	Complete	General - OTC <= 3 Days	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153629	2023-02-08 11:40:59 EST	Cancelled	General - OTC <= 3 Days	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	500
153628	2023-02-07 11:23:10 EST	Complete	Compliance	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5557)	Compliance	1,000
153623	2023-01-15 18:25:59 EST	Complete	Limited Use Holding	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5558)	Limited Use Holding	50
153622	2023-01-15 18:07:04 EST	Complete	Administrative	Entity A, Corp (WA4376-5556)	General	Washington State (WAJ985-987)	Auction	2,500,000

1 2 3 4 5 Next CSV Excel 1-10 of 44 records

Fig. 5: Transfer History Report for Entity A, Corp

Propose The transfer request has been initiated (proposed) by an account representative of the sending entity and is awaiting approval from another account representative of the sending entity.

If the transfer is between two different entities' General Accounts, the receiving entity cannot view the proposed transfer until it is approved by the second account representative of the sending.

Approved The transfer has been agreed to (approved) by the second account representative of the sending. In the two-step process, the transfer is now complete. In the three-step process, the receiving is notified there is a transfer request to review and approve prior to being considered complete. The transfer will display on the account representative home page under Pending Transfers. An account representative of the receiving must accept or decline the transfer.

Complete The transfer request is finished (completed), and the allowance(s) have been transferred out of the sending's account to the receiving's account. Upon approval of a transfer in the two-step process, the transfer is deemed Complete. Upon acceptance of a transfer request in the three-step process, the transfer is deemed Complete.

Cancelled The transfer request has been voided (cancelled) by the sending account representative. Only the representative that initially proposed the transfer can cancel a proposed transfer.

If the proposed transfer was to another entity, the receiving will not receive notification of a transfer request. Allowances will not be transferred.

Denied The transfer request has been prevented (denied) by the second account representative of the sending. The account representative that proposed the transfer is notified that the transfer request has been denied. If the transfer was to another entity, the receiving was not notified of a transfer request. Allowances have not been transferred.

Declined The transfer request has not been approved (declined) by the receiving. The representatives of both entities are notified that the transfer request has been declined. No allowances will be transferred.

Expired The transfer request was not approved within the timeframe allotted for transfers. No allowances will be transferred.

Transfer Proposals

An account representative can view the entities they represent on the CITSS home page after logging in, under the My Accounts heading.

Step 1. Log into CITSS

Step 2. Select “View” in the Actions Column of the entity General Account

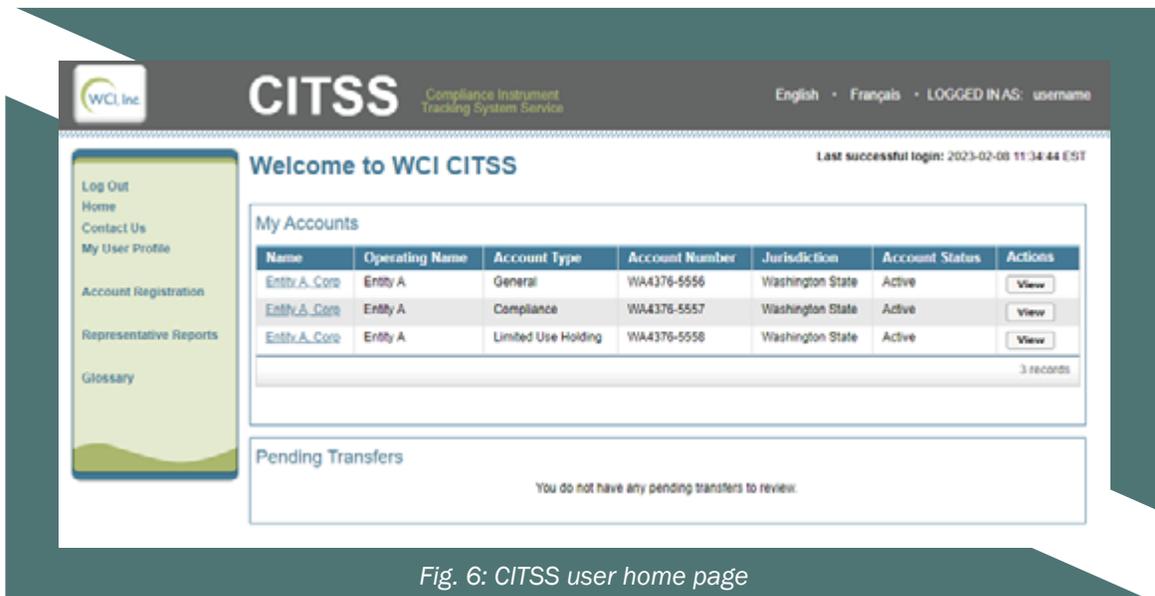


Fig. 6: CITSS user home page

Selecting Instruments to Transfer

The General Account page provides overall information on the account, including account number, account type, status, balance, and available account balance.

The **HOLDINGS** tab provides information on the types of compliance instruments held in the compliance account. They are organized by vintage, type, subtype, offset type, project ID, and special category. Some columns are only applicable to offset credits and will not display information for emission allowance records.

Selecting the “Initiate Transfer” button begins the transfer process.

The screenshot shows the CITSS interface for 'Entity A, Corp General Account (WA4376-5556)'. The page includes a navigation menu on the left with options like 'Log Out', 'Home', 'Contact Us', and 'My User Profile'. The main content area displays account information and a table of holdings. The account details are as follows:

Account Number	WA4376-5556
Account Type	General
Account Status	Active
Account Balance	1,098,950
Available Account Balance	1,098,950

The Holdings tab is active, showing a table with the following data:

Vintage	Jurisdiction	Type	Sub-Type	Offset Type	Offset Project ID	Special Category	Quantity	Initiate Transfer
2023		Allowance					498,950	Initiate Transfer
2026		Allowance					600,000	Initiate Transfer

At the bottom of the table, there are links for 'CSV', 'Excel', and a note '2 records'.

Fig. 7: CITSS Holding (general) Account Detail page, holdings tab

The **TRANSFERS** tab provides information on all transfers in and out of the account. Account representatives can also access this transfer history information from the “Transfer History” report under Representative Reports on the left side menu.

The screenshot shows the CITSS interface for 'Entity A, Corp General Account (WA4376-5556)'. The page includes a navigation menu on the left with options like 'Log Out', 'Home', 'Contact Us', and 'My User Profile'. The main content area displays account information and a table of transfers. The account details are as follows:

Account Number	WA4376-5556
Account Type	General
Account Status	Active
Account Balance	1,098,950
Available Account Balance	1,098,950

The Transfers tab is active, showing a table with the following data:

Transfer ID	Event Date	Status	Transferring Account Name	Receiving Account Name	Quantity Proposed	Quantity Transferred
153629	2023-02-08	Cancelled	Entity A, Corp (WA4376-5556)	WA Company A (WA1000-1000)	-500	
153621	2023-02-08	Complete	Washington State (WA)985-989	Entity A, Corp (WA4376-5556)	600,000	600,000
153628	2023-02-07	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5557)	-1,000	-1,000
153623	2023-01-15	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5558)	-50	-50
153622	2023-01-15	Complete	Entity A, Corp (WA4376-5556)	Washington State (WA)985-987	-2,500,000	-2,500,000
153618	2023-01-13	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5557)	-17,000,000	-17,000,000
153617	2023-01-13	Complete	Washington State (WA)985-989	Entity A, Corp (WA4376-5556)	20,000,000	20,000,000

At the bottom of the table, there are links for 'CSV', 'Excel', and a note '7 records'.

Fig. 8: Entity Holding (general) Account detail page, transfers tab

Transfer Types

After initiating the transfer, you will be prompted to select the type of transfer:

1. Over-the-Counter (OTC) Agreement with delivery in no more than 3 days
2. Over-the-Counter (OTC) Agreement with delivery more than 3 days or involving multiple transfers or combining compliance instruments with other products
3. Exchange Agreement (not to an Exchange Clearing Service Provider)
4. To Compliance Account³
5. To Limited Use Holding Account⁴
6. Exchange Agreement to a Clearing House (not applicable in Washington at this time)
7. Voluntary Retirement (more information in Compliance Guidance.)

The above transfer types are from an entity's general (holding) account. Entities with LUHAs can transfer allowances from the LUHA to the Jurisdiction Auction Account for consignment. For more guidance on consignment, see [Consignment Guidance].

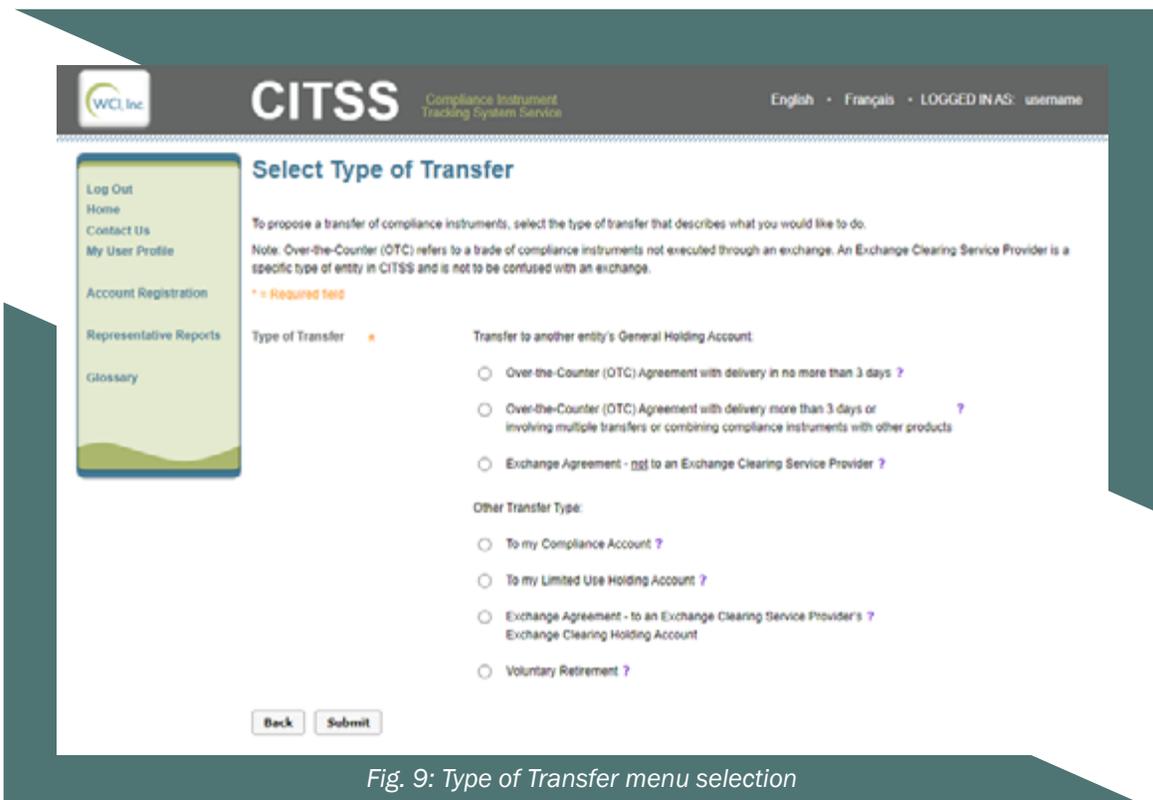


Fig. 9: Type of Transfer menu selection

³ This option will only appear if your entity is assigned a compliance account

⁴ This option will only appear if your entity is assigned a LUHA

Transfer Type Detail

This section provides information for each of the seven (7)⁵ possible transfer scenarios from an entity's holding (general) account.

1. Over-the-Counter (OTC) Agreement with delivery in no more than 3 days

This transfer type is for contract agreements with a receiving entity where the transaction is expected to be completed in no more than 3 days after entering into the agreement.

Follow the steps to select the instruments to transfer and select the radio button for "Over-the-Counter (OTC) Agreement with delivery in no more than 3 days."

Transferring Account Information

The Transferring Account Detail box displays the information about the sending entity. This information is automatically entered by CITSS.

- General Account Number
- Account Type
- Entity Legal Name
- Entity Operating Name
- Compliance Instrument
- Account Balance
- Available Account Balance

⁵ Entities that do not have compliance accounts and/or LUHAs will not see options to transfer to a compliance account or LUHA.

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Transfer to General Account-OTC with Delivery in No More Than 3 Days

You may use this page to propose a transfer of compliance instruments to another entity's General Holding Account for an over-the-counter (OTC) agreement for which delivery will take place no more than three days from the date the parties enter into the transaction agreement. Compliance instruments will not be transferred in CITSS until the following steps have been completed:

Step 1: A PAR or AAR from the transferring entity proposes the transfer request in CITSS. After selecting Submit, Step 1 will be completed and the transfer request will be proposed. The account representatives for the transferring entity will be notified via email.

Step 2: A PAR or AAR from the transferring account approves the transfer request in CITSS. Except for individual account holders, the approving representative must be different than the PAR or AAR who proposes the transfer request. The transfer request must be approved by midnight (Eastern Time) of the second calendar day following proposal of the transfer request. After selecting Process Transfer, Step 2 will be completed and the transfer request will be approved. The account representatives for the transferring and receiving entity will be notified via email.

Step 3: A PAR or AAR from the receiving entity accepts the transfer request in CITSS. The transfer request must be accepted by midnight (Eastern Time) of the third calendar day following proposal of the transfer request. After selecting Process Transfer, Step 3 will be completed and the transfer request will be accepted. The account representatives for the transferring and receiving entity will be notified via email.

Entities may enter a price of zero if the transaction agreement does not contain a price for compliance instruments and the proposed transfer:

- is between entities with a direct corporate association.
- is part of a transaction agreement that combines compliance instruments and other products without pricing information.
- by a California entity meets the criteria stipulated in the California Cap-and-Trade regulation. Refer to the Regulation for guidance before entering \$0 as the price.
- by a Washington entity, meets the criteria stipulated in the Washington cap and invest regulation. Select an option in the drop down menu below.

Refer to the Regulation for specific requirements.

Transferring Account Detail	
Account Number	WA4376-5556
Account Type	General
Legal Name	Entity A, Corp
Operating Name	Entity A
Compliance Instrument	2023 Allowance
Account Balance	488,950
Available Account Balance	488,950

Fig. 10: Transfer to General Account, no more than 3 days information page

Receiving Account Transfer Information

The sending entity account representatives should communicate with the receiving entity account representatives to collect the information required to execute the transfer. Fields marked with an orange asterisk (*) are required.

Account Number*

The account number of the receiving entity consists of the prefix “WA” (Washington) and two (2) series of four (4) digits separated by a hyphen. Example: WA1234-5678. This information is found on the entity’s Account Detail Page.

Entity Reference Code*

The Entity Reference Code of the receiving consists of eight (8) numbers. This information is found on the entity’s Account Detail Page. **This is not the same as the entity account number.**

Quantity*

The amount of compliance instruments to be transferred. This value must not exceed the sending entity's available account balance. **Enter whole numbers only.**

Agreement Date*

The date a contract agreement is accepted by the parties involved in the transaction of compliance instruments.

Expected Termination Date

The date the accepted terms of the contract agreement are completed. This is typically the date of transfer of compliance instruments and payment.

Expected Termination Date Not Specified

Check this box if the termination date was not specified in the contract agreement.

Price \$*

The sending should enter the **average price** for each emissions allowance (**not** the total price of the transaction). For example, if 1,000 allowances are transferred at \$40 per allowance, \$40 should be entered as the price **not** \$40,000.

A price of 0.00 may be entered for five scenarios described in the dropdown of the following field.

If the price is \$0.00, transfer:

There are five scenarios where a transfer may be priced at \$0.00. The transfer is:

1. between parties with a direct corporate association (CAG);
2. part of a transaction agreement that combines compliance instruments and other products without pricing information;
3. from an electric utility to an entity operating a generation facility under an agreement that has no pricing information;
4. from an electric utility to a federal power administrator for emissions associated with imported power; or
5. an offset transfer to replace invalidated offset credits.

Currency

Specify USD (United States Dollar) as the currency involved in the transaction.

Receiving Account and Transfer Information

Account Number * ?

Entity Reference Code * ?

Quantity * ?

Agreement Date * ?

Expected Termination Date ?

Expected Termination Date Not Specified ?

Price \$ * ?

If the price is \$0.00, transfer: ?

Currency ?

Comment

By clicking on the Submit button, 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.

Password *

Fig. 11: Receiving Account and Transfer Information

View the Transfer Request

Upon successful submission of the transfer proposal, the account representative of the sending entity is taken to the Compliance Instrument Transfer Detail page.

The box at the top of the page displays the information entered about the receiving entity as well as the type of transfer. The transfer is given a unique Transfer ID; it is a six-digit ID.

The ACCOUNTS section displays information on the general accounts of both the transferring and receiving entities.

The TRANSFER EVENT HISTORY section displays the current status of the transfer, when the status was changed, any comments, and who changed the status of the transfer.

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Compliance Instrument Transfer Detail

Detailed transfer information for this transfer, identified by the unique Transfer ID, is provided below. The status of this transfer request (Proposed, Approved, Accepted) is dependent on which steps in the transfer process have been completed by the account representatives for the transferring and receiving entities. The transfer request must be Approved by midnight (Eastern Time) of the second calendar day following the transfer proposal. The request can only be Approved by a different account representative than the individual that proposed the transfer request. The transfer request must be Accepted by an account representative of the receiving entity by midnight (Eastern Time) of the third calendar day following the transfer proposal.

Account Number	WA4376-5556
Account Type	General
Transfer ID	153668
Type	General - OTC <= 3 Days
Compliance Instrument	2023 Allowance
Transfer Status	Proposed ?
Agreement Date	2023-03-14
Expected Termination Date	
Expected Termination Date Not Specified	Yes
Price	\$25.00
Currency	USD
If the price is \$0.00, transfer	
Quantity	5,000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company B
Operating Name	Entity A	WA Operating Company B
Account Number	WA4376-5556	WA1001-1004
Account Type	General	General

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-03-14 13:55:02 EDT		User Name

[Back](#) [Cancel Proposed Transfer](#)

Fig. 12: Transfer Detail

Approve the Transfer Request

When a transfer is proposed, a second representative of the sending entity must approve the transfer. See Transfer Approval section.

Over-the-Counter (OTC) Agreement with delivery more than 3 days or involving multiple transfers or combining compliance instruments with other products

This transfer type is for contract agreements with a receiving entity where:

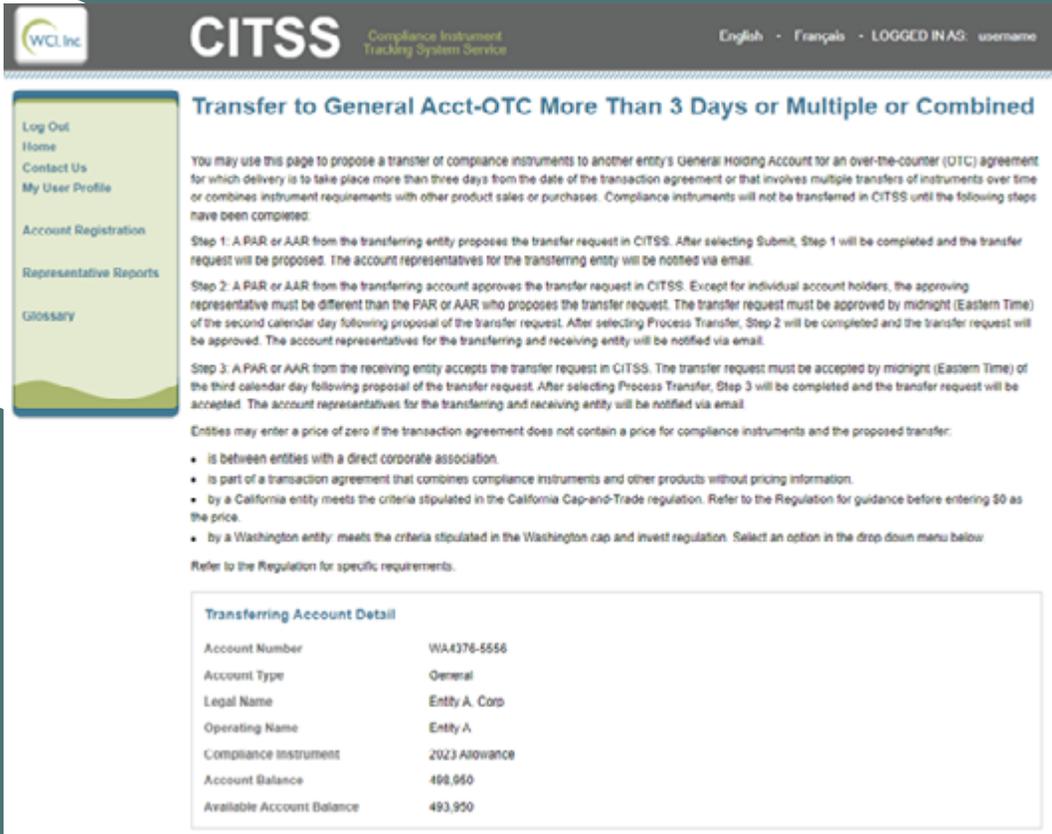
- the transaction is expected to be completed more than three (3) days after entering into the agreement,
- the transaction involves the transfer of several allowances, or
- the allowances are tied to other products being purchased or sold.

Follow the steps to select the instruments to transfer and select the radio button for “Over-the-Counter (OTC) Agreement with delivery in more than 3 days or involving multiple transfers or combining compliance instruments with other products.”

Sending Account Information

The Transferring Account Detail box displays the information about the sending entity. This information is automatically entered by CITSS.

- General Account Number
- Account Type
- Entity Legal Name
- Entity Operating Name
- Compliance Instrument
- Account Balance
- Available Account Balance



The screenshot shows the CITSS (Compliance Instrument Tracking System Service) web application. The page title is "Transfer to General Acct-OTC More Than 3 Days or Multiple or Combined". The main content area contains instructions and three steps for the transfer process. A "Transferring Account Detail" box is visible at the bottom, displaying the following information:

Transferring Account Detail	
Account Number	WA4376-5558
Account Type	General
Legal Name	Entity A, Corp
Operating Name	Entity A
Compliance Instrument	2023 Allowance
Account Balance	498,950
Available Account Balance	493,950

Fig. 13: Transfer to General Account, more than 3 days information page

Receiving Account and Transfer Information

The sending entity account representatives should communicate with the receiving entity account representatives to collect the information required to execute the transfer. Fields marked with an orange asterisk (*) are required.

Account Number*

The account number of the receiving entity consists of the prefix “WA” (Washington) and two series of four digits separated by a hyphen. Example: WA1234-5678. This information is found on the entity’s Account Detail Page.

Entity Reference Code*

The Entity Reference Code of the receiving consists of eight (8) numbers. This information is found on the entity’s Account Detail Page. This is not the same as the entity account number.

Quantity*

The amount of compliance instruments to be transferred. This value must not exceed the sending entity’s available account balance. Enter whole numbers only.

Agreement Date*

The date a contract agreement is accepted by the parties involved in the transaction of compliance instruments.

Expected Termination Date

The date the accepted terms of the contract agreement are completed. This is typically the date of transfer of compliance instruments and payment.

Expected Termination Date Not Specified

Check this box if the termination date was not specified in the contract agreement.

Does the agreement provide for further transfers after this one?

If the agreement allows for additional transfers after this transfer, select “Yes.” Otherwise, select “No.”

Does the agreement provide for transfers of other products?

If the agreement allows for transfer of other products with allowances, select “Yes.” Otherwise, select “No.”

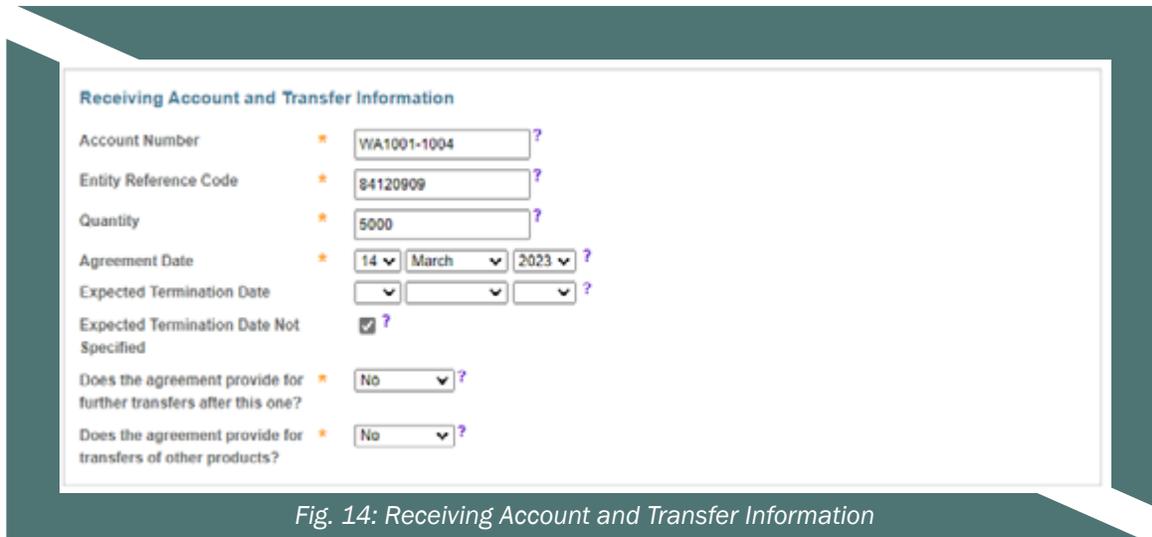


Fig. 14: Receiving Account and Transfer Information

Pricing Information* (Enter data for one of the following)

1. Fixed Price \$

Fixed Price

If the agreement provides for a fix price per emissions allowance, enter the average price for each emissions allowance (not the total price of the transaction). A price of \$0.00 may be entered for five scenarios described in the dropdown of the following field.

If the price is \$0.00, transfer:

There are five scenarios where a transfer may be priced at 0.00:

1. Is between parties with a direct corporate association (CAG)
2. Is part of a transaction agreement that combines compliance instruments and other products without pricing information
3. Is from an electric utility to an entity operating a generation facility under an agreement that has no pricing information
4. Is from an electric utility to a federal power administrator for emissions associated with imported power
5. Is an offset transfer to replace invalidated offset credits

Currency

Specify the USD (United States Dollar) as the currency involved in the transaction.

2. Cost Base + Margin

Cost Base

If the agreement provides for a base price and margin, enter the average base price (not the total price of the transaction)

Margin

If the agreement provides for a base price and margin, enter the average margin price (not the total price of the transaction)

Currency

Specify the USD (United States Dollar) as the currency involved in the transaction

3. Other Pricing Method

Pricing Method Description

If the agreement provides for a method other than fixed price or cost base + margin, describe the pricing method.

Pricing Information (enter data for one of the following): *

1) Fixed Price

Fixed Price \$?

If the price is \$0.00, transfer: ?

Currency ?

2) Cost Base + Margin

Cost Base \$?

Margin \$?

Currency ?

3) Other Pricing Method

Pricing Method Description ?

Comment

By clicking on the Submit button, 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.

Password *

Fig. 15: Pricing Information for transfers of multiple instruments or more than 3 days delivery

View the Transfer Request

Upon successful submission of the transfer proposal, the account representative of the sending entity is taken to the Compliance Instrument Transfer Detail page.

The box at the top of the page displays the information entered about the receiving entity as well as the type of transfer. The transfer is given a unique Transfer ID; it is a six-digit ID.

The [ACCOUNTS](#) section displays information on the general accounts of both the transferring and receiving entities.

The [TRANSFER EVENT HISTORY](#) section displays the current status of the transfer, when the status was changed, any comments, and who changed the status of the transfer.

- Log Out
- Home
- Contact Us
- My User Profile
- Account Registration
- Representative Reports
- Glossary

Compliance Instrument Transfer Detail

Detailed transfer information for this transfer, identified by the unique Transfer ID, is provided below. The status of this transfer request (Proposed, Approved, Accepted) is dependent on which steps in the transfer process have been completed by the account representatives for the transferring and receiving entities. The transfer request must be Approved by midnight (Eastern Time) of the second calendar day following the transfer proposal. The request can only be Approved by a different account representative than the individual that proposed the transfer request. The transfer request must be Accepted by an account representative of the receiving entity by midnight (Eastern Time) of the third calendar day following the transfer proposal.

Account Number	WA4376-5556
Account Type	General
Transfer ID	153660
Type	General - OTC > 3 Days/Multiple/Combined
Compliance Instrument	2023 Allowance
Transfer Status	Proposed ?
Agreement Date	2023-03-14
Expected Termination Date	
Expected Termination Date Not Specified	Yes
Does the agreement provide for further transfers after this one?	No
Does the agreement provide for transfers of other products?	No
Fixed Price	\$20.00
Currency	USD
If the price is \$0.00, transfer	
Cost Base	
Margin	
Pricing Method Description	
Quantity	5,000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company B
Operating Name	Entity A	WA Operating Company B
Account Number	WA4376-5556	WA1001-1004
Account Type	General	General

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-03-14 13:55:52 EDT		User Name

Fig. 16: Transfer detail page

Approve the Transfer Request

When a transfer is proposed, a second representative of the sending entity must approve the transfer. See Transfer Approval section.

Exchange Agreement Transfer to General Account - not to an Exchange Clearing Service Provider

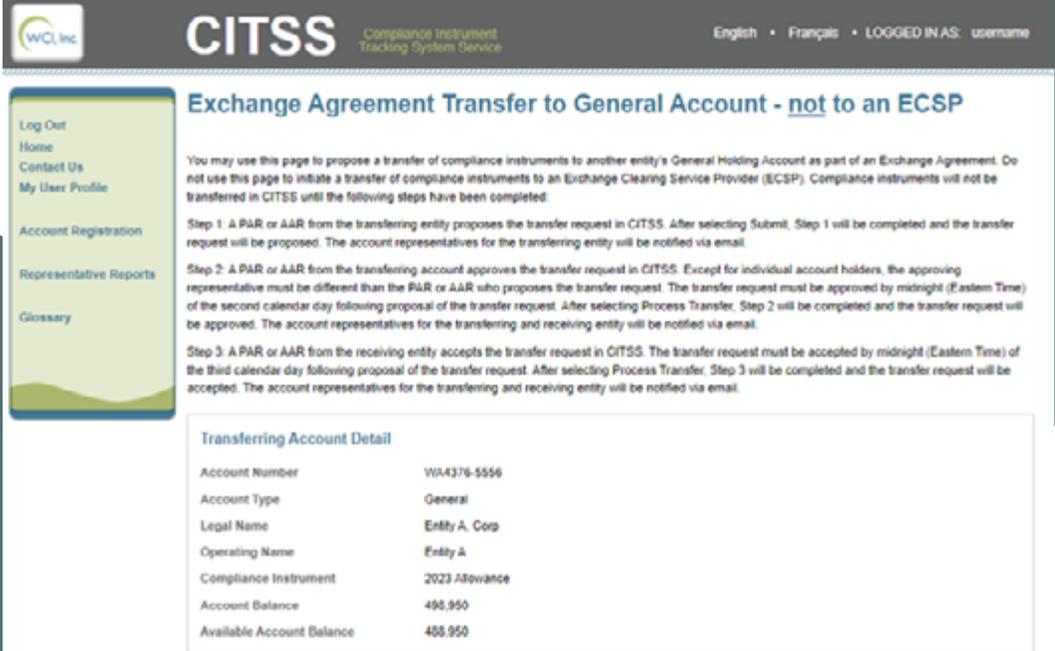
This transfer type is for contract agreements with a receiving where the agreement involves stock exchange or other transaction service.

Follow the steps to select the instruments to transfer and select the radio button for “Exchange Agreement Transfer to General Account – not to an Exchange Clearing Service Provider.”

Sending Account Information

The Transferring Account Detail box displays the information about the sending entity. This information is automatically entered by CITSS.

- General Account Number
- Account Type
- Entity Legal Name
- Entity Operating Name
- Compliance Instrument
- Account Balance
- Available Account Balance



The screenshot shows the CITSS (Compliance Instrument Tracking System Service) web interface. The page title is "Exchange Agreement Transfer to General Account - not to an ECSP". The main content area contains instructions and three steps for the transfer process. A table at the bottom displays the "Transferring Account Detail" for the sending entity.

Transferring Account Detail	
Account Number	WA4376-5556
Account Type	General
Legal Name	Entity A, Corp
Operating Name	Entity A
Compliance Instrument	2023 Allowance
Account Balance	498,950
Available Account Balance	488,950

Fig. 17: Exchange agreement transfer page

Receiving Account Transfer Information

The sending entity account representatives must communicate with the receiving entity account representatives to collect the information required to execute the transfer. Fields marked with an orange asterisk (*) are required.

Account Number*

The account number of the receiving entity consists of the prefix “WA” (Washington) and two series of four digits separated by a hyphen. Example: WA1234-5678. This information is found on the entity’s Account Detail Page.

Entity Reference Code*

The Entity Reference Code of the receiving consists of eight numbers. This information is found on the entity’s Account Detail Page. This is not the same as the entity account number.

Quantity*

The amount of compliance instruments to be transferred. This value must not exceed the sending entity’s available account balance. Enter whole numbers only.

Exchange and Contract Description Code

Choose the exchange code used to trade the allowances being transferred, and the code that the stock exchange assigned the contract. If the exchange code is not listed, see the following field.

Exchange and Contract Description Code is not available above

If the exchange and contract code is not available, check this box.

Other Exchange

Complete this field if you selected the box above.

Other Contract Description Code

Complete this field if you selected the box above.

Date of Close of Trading for the Contract*

The date the contract expires. This is also the date the price of the transfer is established.

Price at Close of Trading for the Contract*

The price of allowances for the contract code established when the stock exchanged closes the day the contract expires.

Currency*

Specify the USD (United States Dollar) as the currency involved in the transaction.

Receiving Account and Transfer Information

Account Number * WA1001-1004 ?

Entity Reference Code * 84120909 ?

Quantity * 5000 ?

Exchange and Contract Description Code Description 79 ?

Exchange and Contract Description Code is not available above ?

Other Exchange ?

Other Contract Description Code ?

Date of Close of Trading for the Contract * 14 March 2023 ?

Price at Close of Trading for the Contract * 25 ?

Currency * USD ?

Comment

By clicking on the Submit button, 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.

Password *

Fig. 18: Receiving account and transfer information

View the Transfer Request

Upon successful submission of the transfer proposal, the account representative of the sending entity is taken to the Compliance Instrument Transfer Detail page.

The box at the top of the page displays the information entered about the receiving entity as well as the type of transfer. The transfer is given a unique Transfer ID; it is a six-digit ID.

The ACCOUNTS section displays information on the general accounts of both the transferring and receiving entities.

The TRANSFER EVENT HISTORY section displays the current status of the transfer, when the status was changed, any comments, and who changed the status of the transfer.

The screenshot displays the CITSS (Compliance Instrument Tracking System Service) interface. The header includes the WCL Inc. logo, the title 'CITSS', and navigation options for English and Français, along with a 'LOGGED IN AS: username' indicator. The main content area is titled 'Compliance Instrument Transfer Detail' and provides detailed information for a specific transfer. A left-hand navigation menu includes links for Log Out, Home, Contact Us, My User Profile, Account Registration, Representative Reports, and Glossary. The transfer details are as follows:

Account Number	WA4376-5556
Account Type	General
Transfer ID	153670
Type	General - Exchange
Compliance Instrument	2023 Allowance
Transfer Status	Proposed ?
Exchange and Contract Description Code	Description 79
Date of Close of Trading for the Contract	2023-03-14
Price at Close of Trading for the Contract	\$25.00
Currency	USD
Quantity	5,000

Below the details is an 'Accounts' section with a table comparing the transferring and receiving accounts:

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company B
Operating Name	Entity A	WA Operating Company B
Account Number	WA4376-5556	WA1001-1004
Account Type	General	General

The 'Transfer Event History' section shows a single event:

Event	Event Date	Comment	Action By
Proposal	2023-03-14 13:58:07 EDT		User Name

At the bottom of the page, there are two buttons: 'Back' and 'Cancel Proposed Transfer'.

Fig. 19: Transfer detail page

Approve the Transfer Request

When a transfer is proposed, a second representative of the sending must approve the transfer. See Transfer Approval section.

Transfer to Compliance Account

This transfer type is for entities to transfer allowances to their compliance account to meet a compliance obligation.

Compliance Accounts are assigned to Covered/Opt-in entities **only**. Once instruments are transferred into a compliance account, **they can no longer be accessed by the entity**. Instruments in compliance accounts can only be accessed by Ecology.

Follow the steps to select the instruments to transfer and select the radio button for “Transfer to Compliance Account.”

Sending Account Information

The Transferring Account Detail box displays the information about the sending entity. This information is automatically entered by CITSS.

- General Account Number
- Account Type
- Entity Legal Name
- Entity Operating Name
- Compliance Instrument
- Account Balance
- Available Account Balance

Receiving Account and Transfer Information

CITSS populates the receiving account information with the entity’s compliance account information. Fields marked with an orange asterisk (*) are required.

Quantity*

The amount of compliance instruments to be transferred. This value must not exceed the sending entity’s available account balance. **Enter whole numbers only.**

Propose Transfer from: General Account

You may use this screen to transfer compliance instruments from your General Holding Account to your Compliance Account. **Transferring compliance instruments to your Compliance Account is a permanent action.** Compliance instruments will not be transferred to your Compliance Account until the following steps have been completed:

Step 1: A PAR or AAR from the transferring account proposes the transfer request in CITSS. After selecting Submit, Step 1 will be completed and the transfer request will be proposed in CITSS and the account representatives for the transferring account will be notified via email.

Step 2: A PAR or AAR from the transferring account approves the transfer request in CITSS. Except for individual account holders, the representative that approves a transfer request must be different than the representative that proposed the transfer request. The transfer request must be approved by midnight (Eastern Time) of the second calendar day following the date the transfer was initially proposed.

A transfer request to the Compliance Account **DOES NOT** require Acceptance, and is completed upon Approval by the second representative.

Transferring Account Detail	
Account Number	WA4376-5556
Account Type	General
Legal Name	Entity A, Corp
Operating Name	Entity A
Compliance Instrument	2023 Allowance
Account Balance	490,950
Available Account Balance	483,960

Account Number	WA4376-5557
Account Name	Entity A, Corp
Account Type	Compliance
Quantity	<input type="text" value="5000"/>
Comment	<input type="text"/>

By clicking on the Submit button, 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 173-448 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.

Password

Fig. 20: To Compliance Account Transfer Page

View the Transfer Request

Upon successful submission of the transfer proposal, the account representative of the sending entity is taken to the Compliance Instrument Transfer Detail page.

The box at the top of the page displays the information entered about the receiving as well as the type of transfer. The transfer is given a unique Transfer ID; it is a six-digit ID.

The **Accounts** section displays information on the general account and compliance account of the entity.

The **Transfer Event History** section displays the current status of the transfer, when the status was changed, any comments, and who changed the status of the transfer.

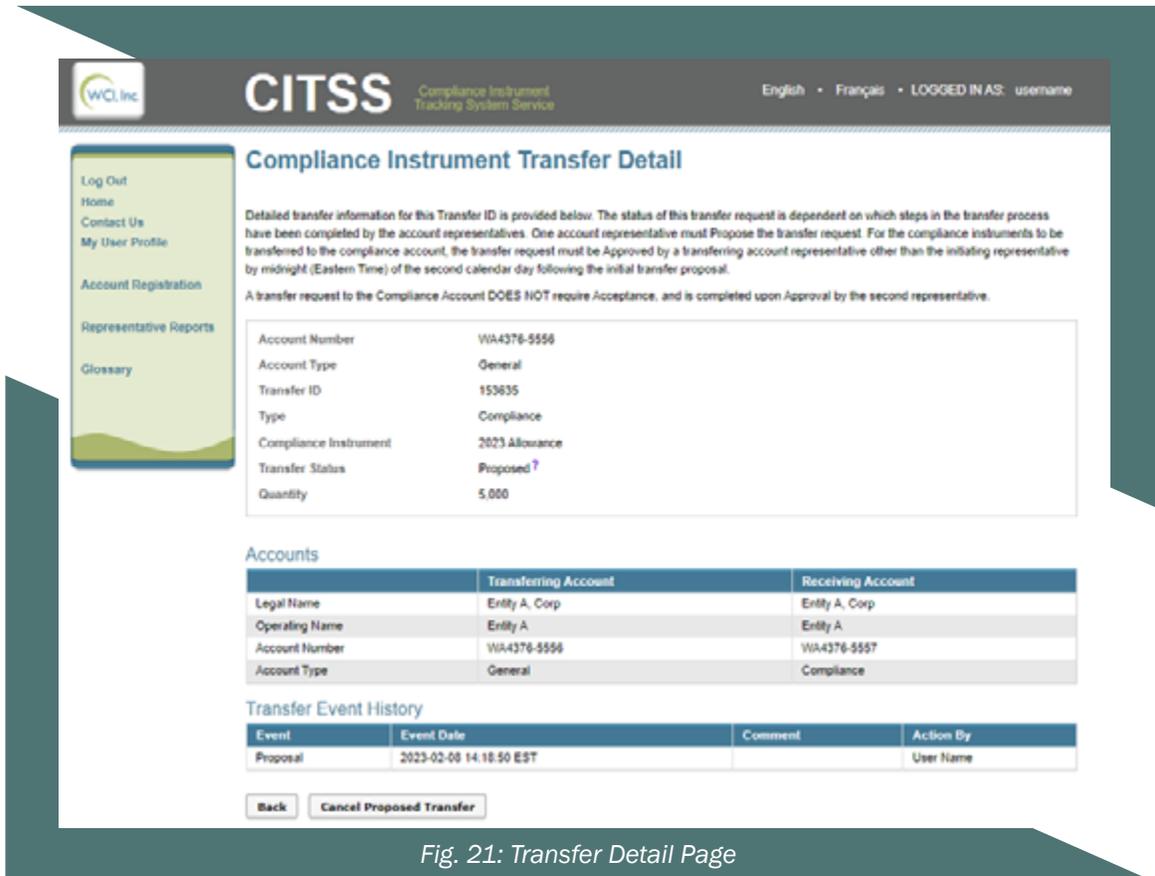


Fig. 21: Transfer Detail Page

Approve the Transfer Request

When a transfer is proposed, a second representative of the sending entity must approve the transfer. See Transfer Approval section.

Transfer to Limited Use Holding Account

This transfer type is for entities to transfer allowances to their Limited Use Holding Account (LUHA).

LUHAs are assigned to electric and natural gas utilities **only**. Once instruments are transferred into a LUHA, **they can no longer be accessed by the entity**. Instruments in LUHAs can only be transferred by the entity to the Jurisdiction Auction Account for consignment.

Follow the steps to select the instruments to transfer and select the radio button for “Transfer to Limited Use Holding Account.”

Sending Account Information

The Transferring Account Detail box displays the information about the sending entity. This information is automatically entered by CITSS.

- General Account Number
- Account Type
- Entity Legal Name
- Entity Operating Name
- Compliance Instrument
- Account Balance
- Available Account Balance

The screenshot displays the CITSS (Compliance Instrument Tracking System Service) interface. At the top, the logo for WCL Inc. and the text 'CITSS Compliance Instrument Tracking System Service' are visible, along with language options (English, Français) and a 'LOGGED IN AS: username' indicator.

The main heading is 'Propose Transfer from: General Account'. Below this, there are instructions: 'You may use this screen to transfer compliance instruments from your General Holding Account to your Limited Use Holding Account. **Transferring compliance instruments to your Limited Use Holding Account is a permanent action.** Compliance instruments will not be transferred to your Limited Use Holding Account until the following steps have been completed.'

Step 1: A PAR or AAR from the transferring account proposes the transfer request in CITSS. After selecting Submit, Step 1 will be completed and the transfer request will be proposed in CITSS and the account representatives for the transferring account will be notified via email.

Step 2: A PAR or AAR from the transferring account approves the transfer request in CITSS. Except for individual account holders, the representative that approves a transfer request must be different than the representative that proposed the transfer request. The transfer request must be approved by midnight (Eastern Time) of the second calendar day following the date the transfer was initially proposed.

A transfer request to the Limited Use Holding Account DOES NOT require Acceptance, and is completed upon Approval by the second representative.

The 'Transferring Account Detail' table is as follows:

Account Number	WA4376-5556
Account Type	General
Legal Name	Entity A, Corp
Operating Name	Entity A
Compliance Instrument	2023 Allowance
Account Balance	498,950
Available Account Balance	478,950

The 'Receiving Account and Transfer Information' section includes:

- Account Number: WA4376-5558
- Account Name: Entity A, Corp
- Account Type: Limited Use Holding
- Quantity: 5000
- Comment: (empty text box)

Below the form is a disclaimer: 'By clicking on the Submit button, 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 173-448 WAC and 70A.05 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.'

At the bottom, there is a 'Password' field and 'Cancel' and 'Submit' buttons.

Fig. 22: Transfer to Limited Use Holding Account

Receiving Account and Transfer Information

CITSS populates the receiving account information with the entity's LUHA information. Fields marked with an orange asterisk (*) are required.

Quantity*

The amount of compliance instruments to be transferred. This value must not exceed the sending entity's available account balance. Enter whole numbers only.

View the Transfer Request

Upon successful submission of the transfer proposal, the account representative of the sending is taken to the Compliance Instrument Transfer Detail page.

The box at the top of the page displays the information entered about the receiving as well as the type of transfer. The transfer is given a unique Transfer ID; it is a six-digit ID.

The **Accounts** section displays information on the general account and LUHA of the entity.

The **Transfer Event History** section displays the current status of the transfer, when the status was changed, any comments, and who changed the status of the transfer.

The screenshot shows the CITSS Compliance Instrument Tracking System Service interface. The page title is "Compliance Instrument Transfer Detail". It provides detailed information for a transfer request, including account details, transfer ID, type, and status. Below this, there are sections for "Accounts" and "Transfer Event History".

Compliance Instrument Transfer Detail

Detailed transfer information for this Transfer ID is provided below. The status of this transfer request is dependent on which steps in the transfer process have been completed by the account representatives. One account representative must Propose the transfer request. For the compliance instruments to be transferred to the Limited Use Holding Account, the transfer request must be Approved by a transferring account representative other than the initiating representative by midnight (Eastern Time) of the second calendar day following the initial transfer proposal.

A transfer request to the Limited Use Holding Account DOES NOT require Acceptance, and is completed upon Approval by the second representative.

Account Number	WA4376-5556
Account Type	General
Transfer ID	153636
Type	Limited Use Holding
Compliance Instrument	2023 Allowance
Transfer Status	Proposed ?
Quantity	5,000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	Entity A, Corp
Operating Name	Entity A	Entity A
Account Number	WA4376-5556	WA4376-5556
Account Type	General	Limited Use Holding

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-02-08 14:29:39 EST		User Name

[Back](#) [Cancel Proposed Transfer](#)

Fig. 23: : Limited Use Holding Account Transfer Detail Page

Approve the Transfer Request

When a transfer is proposed, a second representative of the sending must approve the transfer. See Transfer Approval section.

Exchange Agreement - to an Exchange Clearing Service Provider's Exchange Clearing Holding Account

At this time, Exchange Clearing Holding Accounts are not assigned to entities in the Washington cap-and-invest program for purposes of facilitating an exchange clearing agreement.

Voluntary Retirement

This transfer type is for entities to transfer allowances to the Jurisdiction Retirement Account.

Once instruments are transferred into the Jurisdiction Retirement Account, they can no longer be accessed by the entity. Allowances transferred for voluntary retirement do not meet a compliance obligation for an entity.

More information about transfers to the Jurisdiction Retirement Account can be found in the Compliance Guide.

Transfer Approval

All proposed transfers are listed on the CITSS homepage under the “Pending Transfers” section. Account representatives are also notified via an automated email from CITSS that a transfer has been proposed. In the **two-step transfer process**, once a transfer is approved the transfer is considered Complete.

For transfers proposed by Covered/Opt-In and General Market Participant Organization entities, **a different account representative must approve the proposed transfer.**

Individual General Market Participants can propose and approve transfers if there are no other account representatives assigned to the account. If there is at least one other account representative assigned to an individual GMP account, the other account representative will have to approve any proposed transfers.

To confirm the proposed transfer, the second account representative must:

- Step 1.** Log in to CITSS
- Step 2.** Select the Transfer ID of the pending transfer on the CITSS homepage
- Step 3.** Review the transfer information
- Step 4.** Approve/deny transfer
- Step 5.** Enter password to agree to the attestation
- Step 6.** Select Process Transfer

Note

Once the second account representative selects to process transfer, the transfer cannot be reversed by the sending entity.

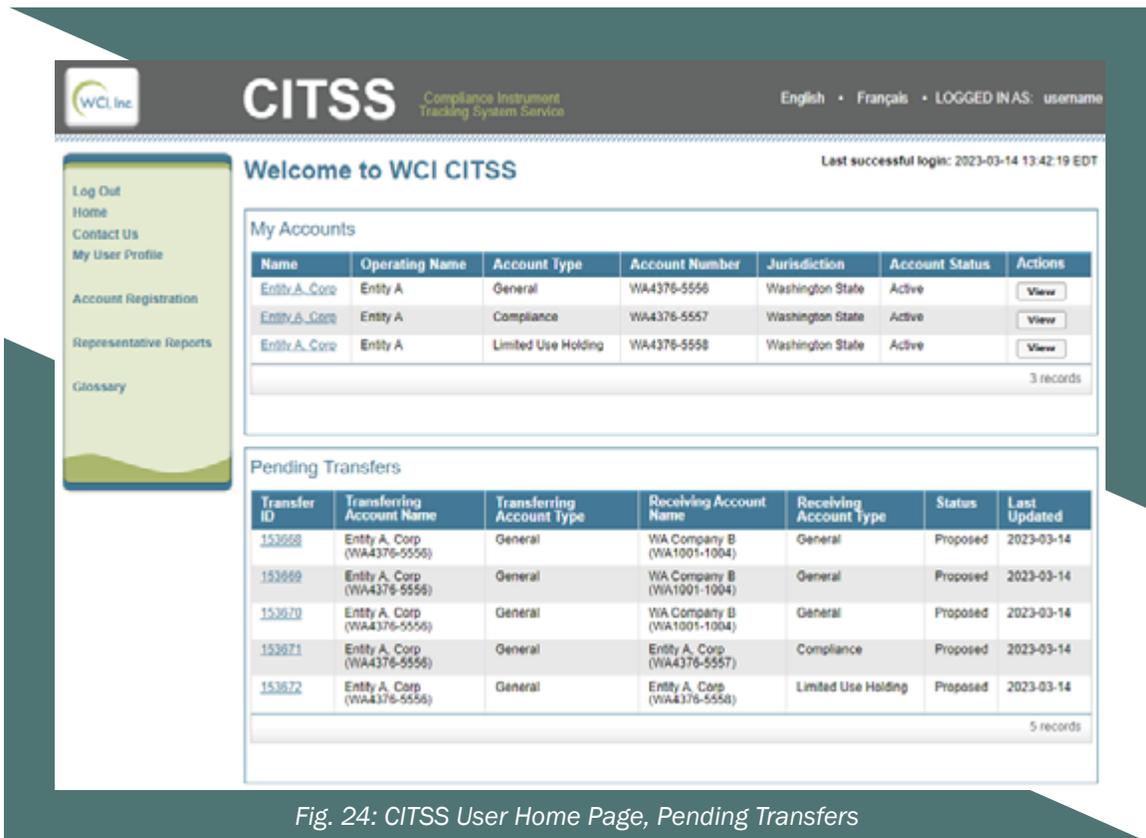


Fig. 24: CITSS User Home Page, Pending Transfers

WCL Inc. **CITSS** Compliance Instrument Tracking System Service English • Français • LOGGED IN AS: annwilson

Compliance Instrument Transfer Detail

Detailed transfer information for this transfer, identified by the unique Transfer ID, is provided below. The status of this transfer request (Proposed, Approved, Accepted) is dependent on which steps in the transfer process have been completed by the account representatives for the transferring and receiving entities. The transfer request must be Approved by midnight (Eastern Time) of the second calendar day following the transfer proposal. The request can only be Approved by a different account representative than the individual that proposed the transfer request. The transfer request must be Accepted by an account representative of the receiving entity by midnight (Eastern Time) of the third calendar day following the transfer proposal.

Account Number	WA4376-5556
Account Type	General
Transfer ID	153668
Type	General - OTC <= 3 Days
Compliance Instrument	2023 Allowance
Transfer Status	Proposed ?
Agreement Date	2023-03-14
Expected Termination Date	
Expected Termination Date Not Specified	Yes
Price	\$25.00
Currency	USD
If the price is \$0.00, transfer	
Quantity	5.000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company B
Operating Name	Entity A	WA Operating Company B
Account Number	WA4376-5556	WA1001-1004
Account Type	General	General

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-03-14 13:55:02 EDT		User Name

Fig. 25: Transfer Detail Page for Approval

Approve/Deny Transfer

A transfer to another general holding account in CITSS has been proposed. You must either approve or deny this transfer request by midnight (Eastern Time) of the second calendar day following the proposal of the transfer request. If you approve this transfer request, the receiving entity account representatives will be notified via email of your approval. An account representative from the receiving entity will need to accept or decline this transfer for the transfer to be completed.

* = Required field

Decision * Approve Deny

Comment

By clicking on the Submit button, 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.

Password *

Process Transfer

Back

Fig. 26: Approve/Deny Transfer Page

Once the second account representative has approved the transfer, the General Account detail page will appear with a success message at the top indicating the transfer has been approved.

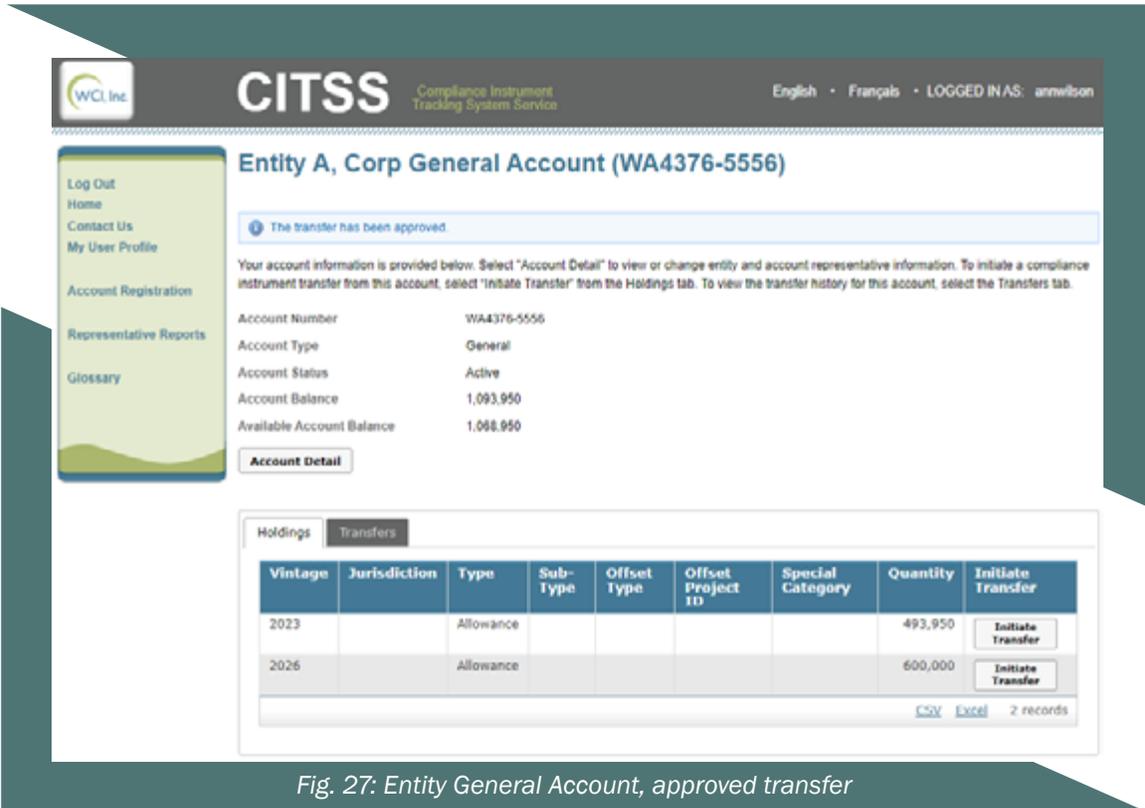


Fig. 27: Entity General Account, approved transfer

Under the TRANSFERS Tab of the General Account, the transfer status will be changed to “Approved.”

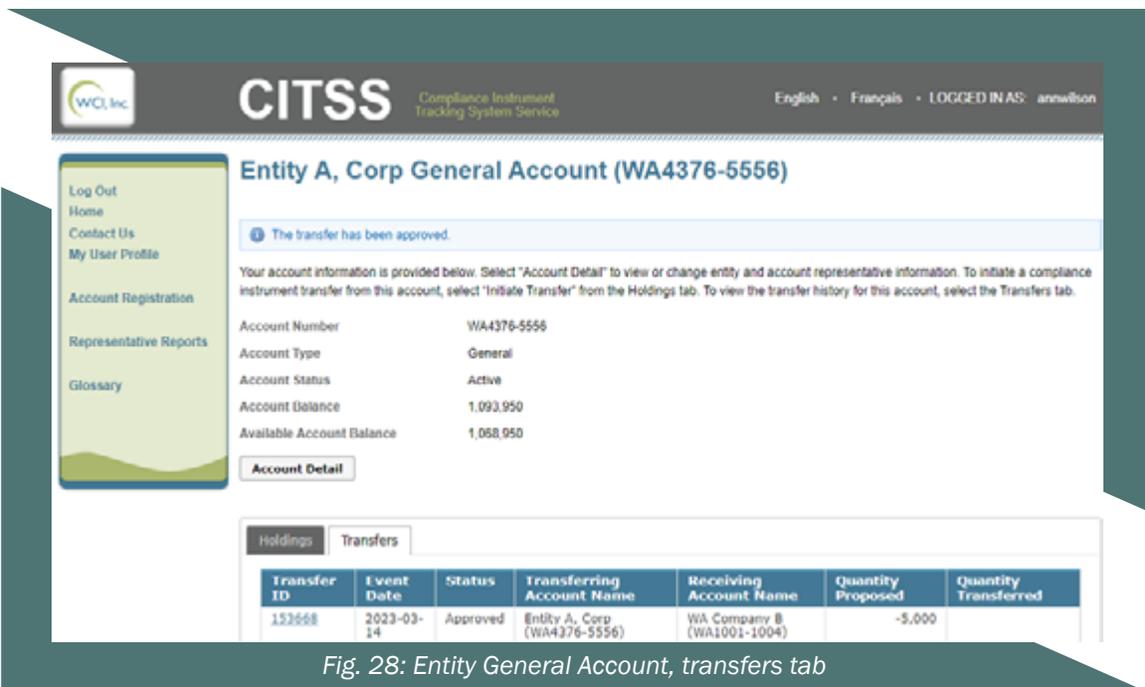


Fig. 28: Entity General Account, transfers tab

Transfer Acceptance

Three-step transfers must be accepted by an account representative of the receiving entity. Once a transfer is accepted by the receiving entity, the transfer is considered complete.

For transfers proposed by Covered/Opt-In and General Market Participant Organization entities, a different account representative must approve the proposed transfer.

Individual General Market Participants can propose and approve transfers if there are no other account representatives assigned to the account. If there is at least one other account representative assigned to an individual GMP account, the other account representative will have to approve any proposed transfers.

- Step 1.** Log in to CITSS
- Step 2.** Select the Transfer ID of the pending transfer on the CITSS homepage (“Approved” status)
- Step 3.** Review the transfer information
- Step 4.** Accept/decline transfer
- Step 5.** Enter password to agree to the attestation
- Step 6.** Select Process Transfer

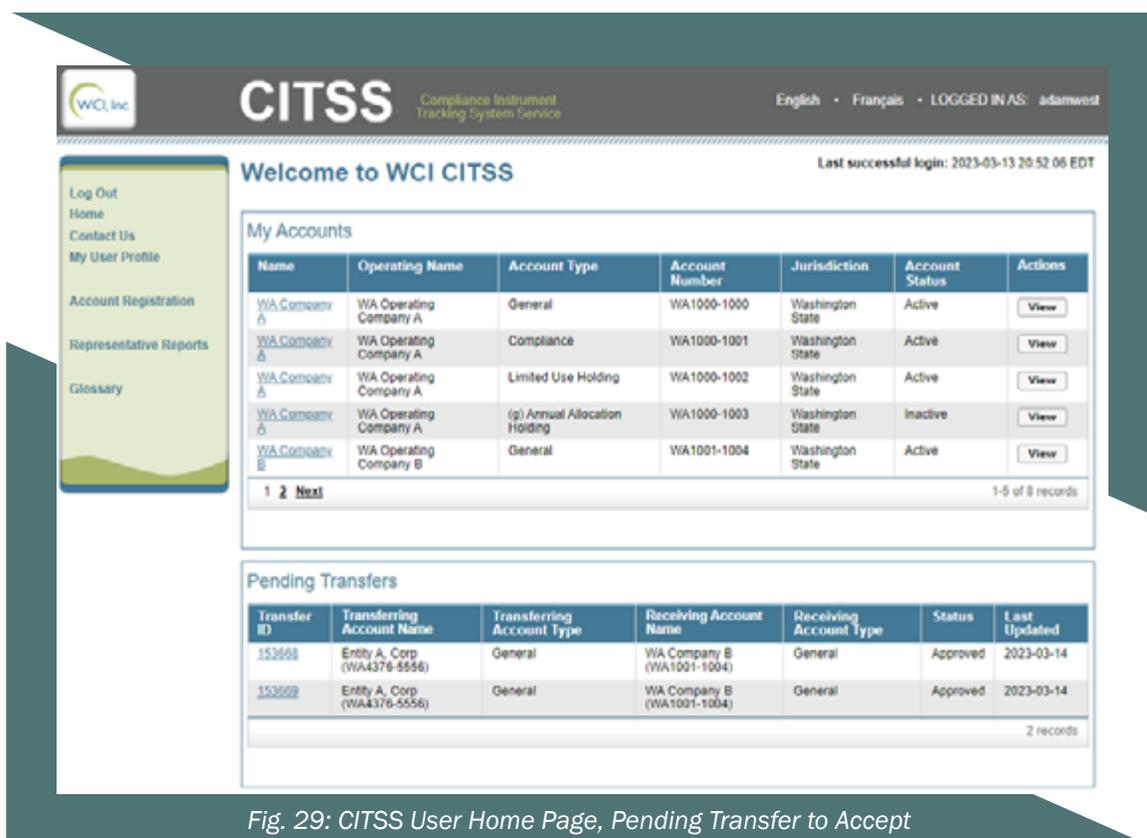


Fig. 29: CITSS User Home Page, Pending Transfer to Accept



- Log Out
- Home
- Contact Us
- My User Profile
- Account Registration
- Representative Reports
- Glossary

Compliance Instrument Transfer Detail

Detailed transfer information for this transfer, identified by the unique Transfer ID, is provided below. The status of this transfer request (Proposed, Approved, Accepted) is dependent on which steps in the transfer process have been completed by the account representatives for the transferring and receiving entities. The transfer request must be Approved by midnight (Eastern Time) of the second calendar day following the transfer proposal. The request can only be Approved by a different account representative than the individual that proposed the transfer request. The transfer request must be Accepted by an account representative of the receiving entity by midnight (Eastern Time) of the third calendar day following the transfer proposal.

Account Number	WA1001-1004
Account Type	General
Transfer ID	153668
Type	General - OTC <= 3 Days
Compliance Instrument	2023 Allowance
Transfer Status	Approved ?
Agreement Date	2023-03-14
Expected Termination Date	
Expected Termination Date Not Specified	Yes
Price	\$25.00
Currency	USD
If the price is \$0.00, transfer	
Quantity	5,000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company B
Operating Name	Entity A	WA Operating Company B
Account Number	WA4376-5555	WA1001-1004
Account Type	General	General

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-03-14 13:55:02 EDT		
Approval	2023-03-14 14:00:35 EDT		

Fig. 30: Transfer Detail Page to Accept

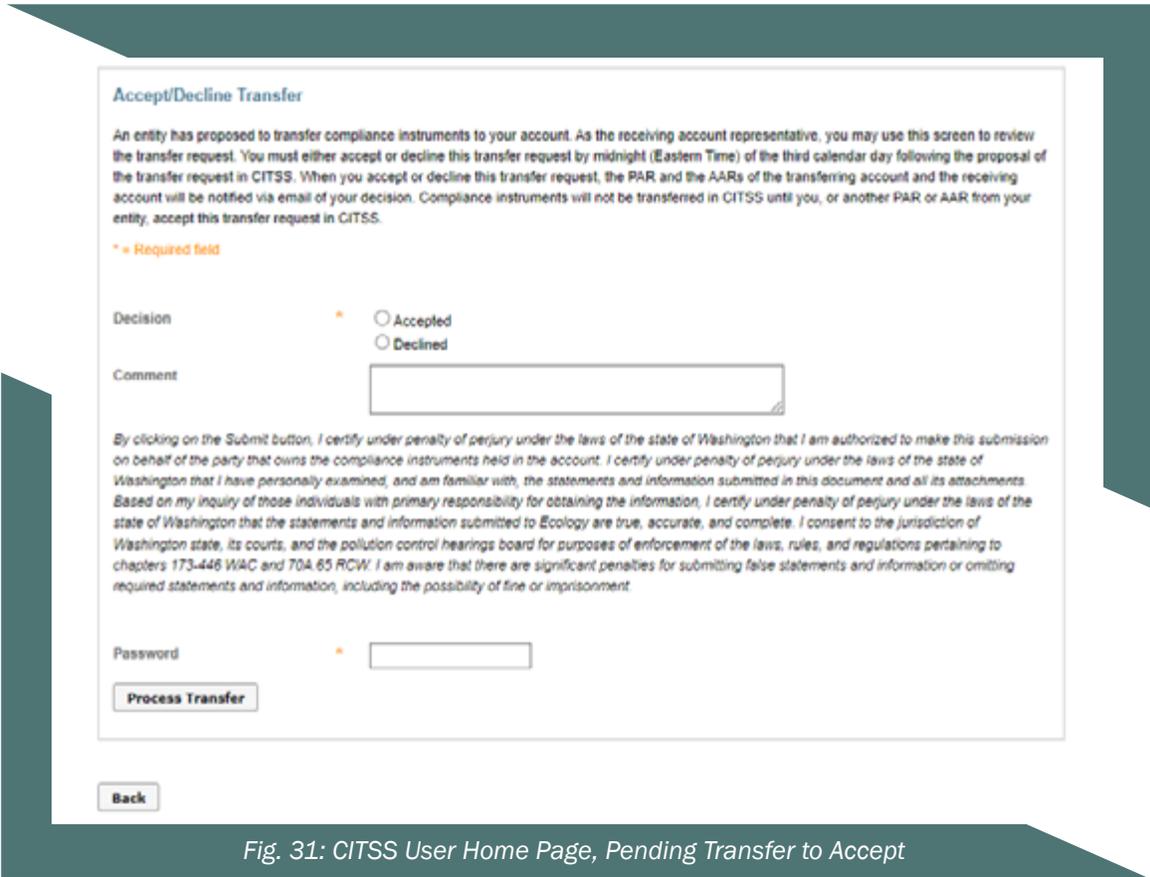


Fig. 31: CITSS User Home Page, Pending Transfer to Accept

Once an account representative of the receiving (receiving entity) has accepted the transfer, the General Account detail page will appear with a success message at the top indicating the transfer has been accepted. The compliance instruments have successfully been transferred to the account.

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WA Company B General Account (WA1001-1004)

The transfer has been accepted and the compliance instruments transferred to your account

Your account information is provided below. Select "Account Detail" to view or change entity and account representative information. To initiate a compliance instrument transfer from this account, select "Initiate Transfer" from the Holdings tab. To view the transfer history for this account, select the Transfers tab.

Account Number: WA1001-1004
 Account Type: General
 Account Status: Active
 Account Balance: 30,915
 Available Account Balance: 30,915

Account Detail

Holdings **Transfers**

Vintage	Jurisdiction	Type	Sub-Type	Offset Type	Offset Project ID	Special Category	Quantity	Initiate Transfer
2015	Washington State	Offset		Livestock Projects	WA2015-1	Direct Environmental Benefits in the State Not On Tribal Land	615	Initiate Transfer
2016	Washington State	Offset		Ozone Depleting Substances Projects	WA2016-1	Direct Environmental Benefits in the State and On Tribal Land	300	Initiate Transfer
2023		Allowance					30,000	Initiate Transfer

[CSV](#) [Excel](#) 3 records

Fig. 32: Entity General Account, accepted transfer

Under the **TRANSFERS** tab of the General Account, the transfer status will be changed to “Complete.”

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WA Company B General Account (WA1001-1004)

The transfer has been accepted and the compliance instruments transferred to your account

Your account information is provided below. Select "Account Detail" to view or change entity and account representative information. To initiate a compliance instrument transfer from this account, select "Initiate Transfer" from the Holdings tab. To view the transfer history for this account, select the Transfers tab.

Account Number: WA1001-1004
 Account Type: General
 Account Status: Active
 Account Balance: 30,915
 Available Account Balance: 30,915

Account Detail

Holdings **Transfers**

Transfer ID	Event Date	Status	Transferring Account Name	Receiving Account Name	Quantity Proposed	Quantity Transferred
153668	2023-03-14	Complete	Entity A, Corp (WA4376-5556)	WA Company B (WA1001-1004)	5,000	5,000

Fig. 33: Entity General Account, transfers tab

Transfer History

Account representatives can view an entity’s transfer history for all accounts or by individual account⁶.

Transfer History for All Accounts

- Step 1.** Log into CITSS
- Step 2.** Select “Representative Reports” from the left side menu
- Step 3.** Select “Continue” for the “Transfer History” Report under Transfer and Balance Reports



Fig. 34: Representative Reports

⁶ “Individual account” refers to account types, such as a holding account, compliance account, or LUHA.

On the report page, an account representative can filter and refine search results for transfers conducted across all accounts. Account representatives can search by:

- Transfer ID
- Status (see Transfer Statuses section above for a description of different statuses)
- Transfer Type
- Transferring Account Name
- Transferring Account Number
- Transferring Account Type
- Receiving Account Name
- Receiving Account Number
- Receiving Account Type
- Event Date From
- Event Date To
- Results per Page

Select “Search” to generate results. Select “Clear” to erase search criteria.

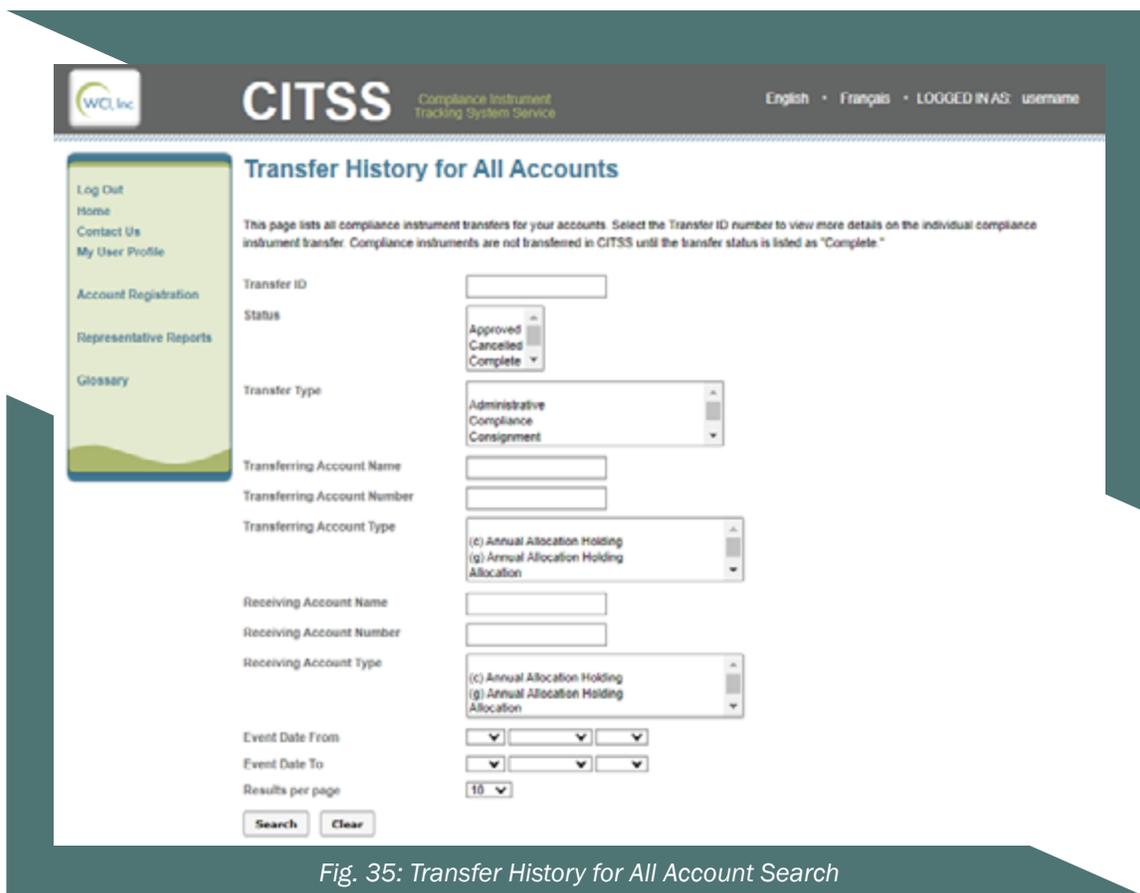


Fig. 35: Transfer History for All Account Search

The table below the search criteria can be exported as a CSV or Excel file. If search criteria is entered, the exported CSV or Excel file will contain only the refined results.

Transfer ID	Event Date	Status	Transfer Type	Transferring Account Name	Transferring Account Type	Receiving Account Name	Receiving Account Type	Quantity
153632	2023-02-08 17:03:06 EST	Complete	General - OTC <= 3 Days	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153637	2023-02-08 14:34:03 EST	Proposed	Voluntary Retirement	Entity A, Corp (WA4376-5556)	General	Washington State (WAJ985-984)	Retirement	5,000
153636	2023-02-08 14:29:39 EST	Proposed	Limited Use Holding	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5558)	Limited Use Holding	5,000
153625	2023-02-08 14:18:50 EST	Proposed	Compliance	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5557)	Compliance	5,000
153634	2023-02-08 13:31:10 EST	Proposed	General - Exchange	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153633	2023-02-08 13:04:43 EST	Proposed	General - OTC > 3 Days/Multiple/Combined	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	5,000
153629	2023-02-08 11:40:59 EST	Cancelled	General - OTC <= 3 Days	Entity A, Corp (WA4376-5556)	General	WA Company A (WA1000-1000)	General	500
153631	2023-02-08 11:40:42 EST	Complete	Jurisdiction	Washington State (WAJ985-989)	Issuance	Entity A, Corp (WA4376-5556)	General	600,000
153628	2023-02-07 11:23:10 EST	Complete	Compliance	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5557)	Compliance	1,000
153623	2023-01-15 18:25:59 EST	Complete	Limited Use Holding	Entity A, Corp (WA4376-5556)	General	Entity A, Corp (WA4376-5558)	Limited Use Holding	50

1 2 Next [CSV](#) [Excel](#) 1-10 of 14 records

Fig. 36: Transfers History Records for all accounts (that meet criteria)

Transfer History for One Account

- Step 1.** Log into CITSS
- Step 2.** Select “View” for the account to review on the CITSS homepage under My Accounts
- Step 3.** Select the Transfers Tab

Transfers for an individual account cannot be filtered. Entire transfer histories for individual accounts can be exported as either CSV or Excel.

CITSS Compliance Instrument Tracking System Service

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Entity A, Corp General Account (WA4376-5556)

Your account information is provided below. Select "Account Detail" to view or change entity and account representative information. To initiate a compliance instrument transfer from this account, select "Initiate Transfer" from the Holdings tab. To view the transfer history for this account, select the Transfers tab.

Account Number: WA4376-5556
 Account Type: General
 Account Status: Active
 Account Balance: 1,093,950
 Available Account Balance: 1,068,950

Account Detail

Holdings | **Transfers**

Transfer ID	Event Date	Status	Transferring Account Name	Receiving Account Name	Quantity Proposed	Quantity Transferred
153632	2023-02-08	Complete	Entity A, Corp (WA4376-5556)	WA Company A (WA1000-1000)	-5,000	-5,000
153637	2023-02-08	Proposed	Entity A, Corp (WA4376-5556)	Washington State (WAJ985-984)	-5,000	
153636	2023-02-08	Proposed	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5558)	-5,000	
153635	2023-02-08	Proposed	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5557)	-5,000	
153634	2023-02-08	Proposed	Entity A, Corp (WA4376-5556)	WA Company A (WA1000-1000)	-5,000	
153633	2023-02-08	Proposed	Entity A, Corp (WA4376-5556)	WA Company A (WA1000-1000)	-5,000	
153629	2023-02-08	Cancelled	Entity A, Corp (WA4376-5556)	WA Company A (WA1000-1000)	-500	
153631	2023-02-08	Complete	Washington State (WAJ985-989)	Entity A, Corp (WA4376-5556)	600,000	600,000
153628	2023-02-07	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5557)	-1,000	-1,000
153623	2023-01-15	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5558)	-50	-50
153622	2023-01-15	Complete	Entity A, Corp (WA4376-5556)	Washington State (WAJ985-987)	-2,500,000	-2,500,000
153618	2023-01-13	Complete	Entity A, Corp (WA4376-5556)	Entity A, Corp (WA4376-5557)	-17,000,000	-17,000,000
153617	2023-01-13	Complete	Washington State (WAJ985-989)	Entity A, Corp (WA4376-5556)	20,000,000	20,000,000

[CSV](#) [Excel](#) 13 records

Fig. 37: Transfer History for All Account Search

Transfer Details

Transfer details are provided by the Transfer ID from either the Transfer History Report or the Transfers Tab for individual accounts.

The details page shows all events involved in transfer process with time and date stamps. CITSS operates on Eastern Time (ET). All times shown are in ET.

All account representatives of both entities involved in a transfer can view any comments left during the transfer process. The names of account representatives are not disclosed, but the name and account numbers of the transferring and receiving accounts are available.



CITSS

Compliance Instrument
Tracking System Service

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Compliance Instrument Transfer Detail

Detailed transfer information for this transfer, identified by the unique Transfer ID, is provided below. The status of this transfer request (Proposed, Approved, Accepted) is dependent on which steps in the transfer process have been completed by the account representatives for the transferring and receiving entities. The transfer request must be Approved by midnight (Eastern Time) of the second calendar day following the transfer proposal. The request can only be Approved by a different account representative than the individual that proposed the transfer request. The transfer request must be Accepted by an account representative of the receiving entity by midnight (Eastern Time) of the third calendar day following the transfer proposal.

Account Number	WA4376-5556
Account Type	General
Transfer ID	153632
Type	General - OTC <= 3 Days
Compliance Instrument	2023 Allowance
Transfer Status	Complete ?
Agreement Date	2023-02-08
Expected Termination Date	
Expected Termination Date Not Specified	Yes
Price	\$25.00
Currency	USD
If the price is \$0.00, transfer	
Quantity	5,000

Accounts

	Transferring Account	Receiving Account
Legal Name	Entity A, Corp	WA Company A
Operating Name	Entity A	WA Operating Company A
Account Number	WA4376-5556	WA1000-1000
Account Type	General	General

Transfer Event History

Event	Event Date	Comment	Action By
Proposal	2023-02-08 12:32:49 EST		User Name
Approval	2023-02-08 16:57:29 EST		Ann Wilson
Acceptance	2023-02-08 17:03:06 EST		
Completion	2023-02-08 17:03:06 EST		

[Back](#)

Log Out
Home
Contact Us
My User Profile
Account Registration
Representative Reports
Glossary

Fig. 38: Transfer Detail Page, completed transfer

Resources

CITSS New User Registration and User Profile Management Guide

[CITSS Entity Account Application Guide](#)

CITSS Entity Account Management Guide

[CITSS homepage](#)

[CITSS support webpage](#)

Auction Platform Guide

[WCI Auction Platform](#)

[Ecology CCA Auctions and Market webpage](#)

[Ecology Climate Commitment Act webpage](#)

If you have additional questions, please contact us at RegistrarCCA@ecy.wa.gov or 360-407-6296.

Appendices

Appendix A - Access to CITSS

Registered users can access CITSS at <https://www.wci-citss.org>. Take note of the information in the [GUIDELINES FOR USE](#) section of the CITSS home page.

- Do not use your browser's back arrow.
- Do not switch between English and French.
- Use a compatible web browser (Microsoft Edge, Firefox, Safari, Chrome, and Opera)
- Storing CITSS user names and passwords in your browser makes your account less secure.
- Please avoid using your browsers "autofill" function as this may result in improper data entry and return errors.

Acknowledgments

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