

EPE Reporting Tool Training

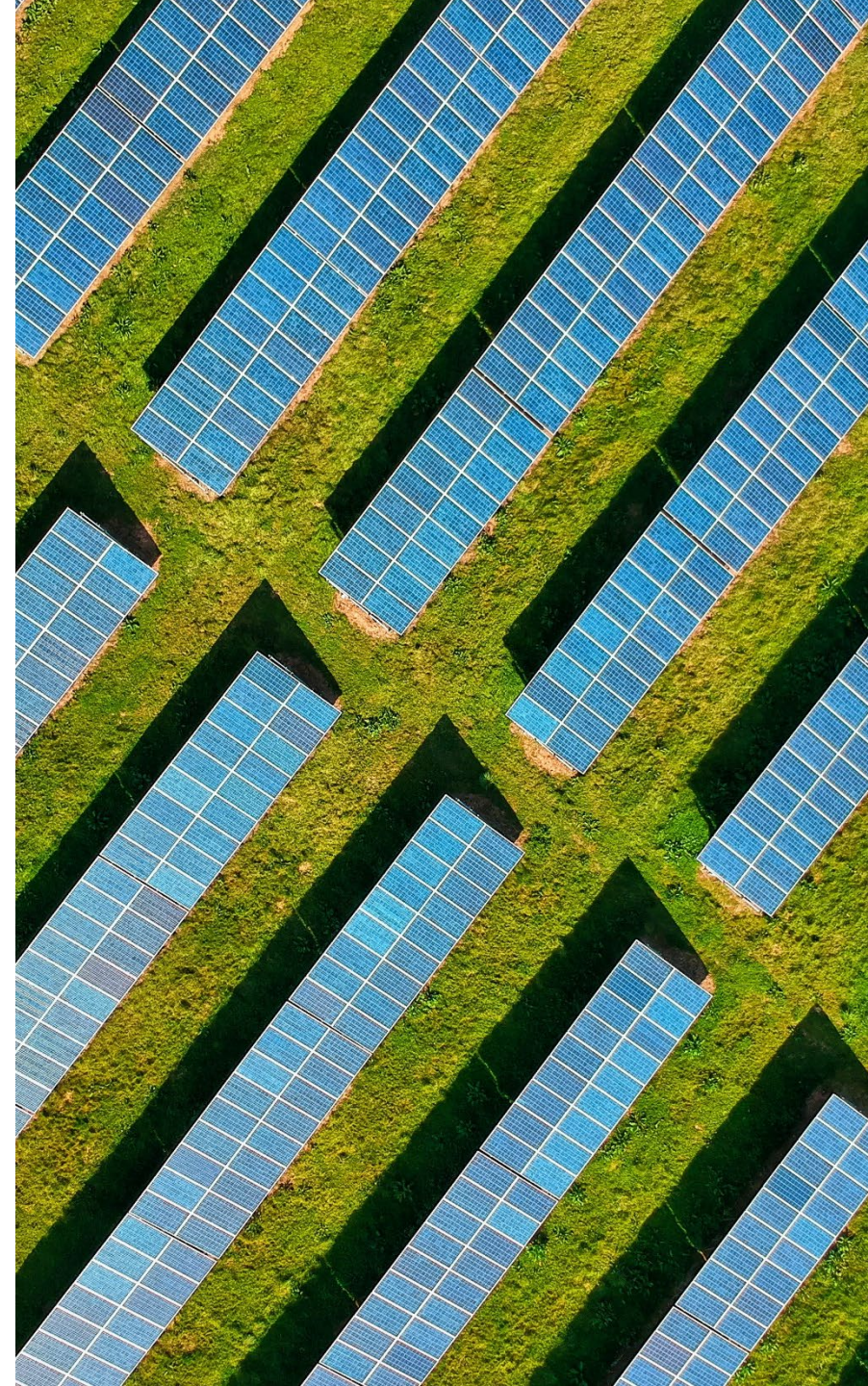
August 9, 2023

Presented by Emma Barrett
Emissions Reporting and Verification Section



Training Overview

- Introduction
- Reporting Information
 - Covered Emissions
 - Reporting Tools
 - EPE Reporting Dates
 - E-Tag, POR, and POD
 - Direct Delivery
 - Imported and Exported Electricity
- EPE Reporting Tool
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 - Uploading and Signing Reports



Introduction

- Beginning with the 2022 emissions year reported in 2023, reporting is mandatory for an owner or operator of any electric power entity (EPE) with total GHG emissions that exceed the reporting threshold of 10k MT CO_{2e} per WAC 173-441
- WAC 173-441-124 Calculation methods for electric power entities
- View the whitepaper: [Consideration of electricity imports and determination of the electricity importer under the Climate Commitment Act](#)
 - View Ecology's response to the whitepaper [here](#)
- Interim Guidance for Electric Power Entity Reporting

Reporting Information

- Reporting tools WAC 173-441-124
- GHG Inventory Program Documentation WAC 173-441-124(4)
- Record Retention WAC 173-441-050(6)
 - Records must be retained **10 years** from date of report
 - Records must be made available to Ecology within **15 business days** of request
- Third-Party Verification WAC 173-441-185
 - Beginning with 2023 emissions year reported in 2024
 - Threshold: 25,000 MT CO₂e or more per calendar year
 - Visit our [website](#) for more details and training dates

Questions?

Contact Ecology at
GHGReporting@ecy.wa.gov

Covered Emissions

WAC 173-446

- First Jurisdictional Deliverers with more than 25,000 metric tons of covered emissions are required to participate in the CCA's cap-and-invest program and obtain allowances to cover their emissions
- Covered Emissions
 - Include specified and unspecified imports
 - The first jurisdictional deliverer that reports GHG emissions under WAC 173-441 holds the compliance obligation for the covered emissions

Questions?

Contact Ecology at
GHGReporting@ecy.wa.gov

Reporting Tools

Ecology-provided Excel tools for calculating Emissions Factors and EPE Emissions per WAC 173-441-124:

- **Specified Source Registration Tool**
 - Required for each reporting entity claiming specified facilities or units for imported or exported electricity must register its anticipated specified sources with Ecology
- **EPE Reporting Tool**
 - Required for each reporting entity claiming imported or exported power
 - Updated with Emissions Factors each reporting year
- **MJRP Reporting Tool**
 - Required for all multijurisdictional retail providers
- **ACS Reporting Tool**
 - Required for all asset controlling suppliers approved by Ecology

Questions?

Contact Ecology at
GHGReporting@ecy.wa.gov

EPE Reporting Dates

Date	Activity
April 2	Specified Source Registration
May 1	ACS Designation Application
June 1	EPE Reporting Tool MJRP Reporting Tool ACS Reporting Tool
August 10	Completed Third Party Verification of Emissions Reports*

*Reporters that emit 25,000 MT CO₂e (including biogenic CO₂) or more per calendar year in total GHG emissions or have a CCA compliance obligation must have their report third party verified as specified in WAC 173-441-085.

e-Tag, POR, and POD

WAC 173-441-124(2)

- **“E-tag”** – an energy tag representing transactions scheduled to flow between or across BAAs and to and from locations listed in an affiliated registry
- **Final Point of Delivery (POD)** – the sink specified on the e-tag, where defined points have been established through the affiliated registry
- **First POD in WA** – the first defined point on the transmission system located inside WA at which imported electricity may be measured, consistent with defined points that have been established through the affiliated registry

e-Tag, POR, and POD cont.

WAC 173-441-124(2)

- **Point of Receipt (POR)** – the point on an electricity transmission or distribution system where an electricity receiver receives electricity from a deliverer
- **First POR** – the generation source specified on the e-tag where defined points have been established through the affiliated registry
 - When e-tags are not used to document electricity deliveries, the first POR is the location of the individual generating facility or unit or group of units

Direct Delivery

WAC 173-441-124(2)(a)

Direct Delivery of Electricity meets the following criteria:

- The facility has a first point of interconnection at a Washington scheduling point or within a power system
- The electricity is scheduled for delivery from the specified source to a Washington scheduling point or a power system via a continuous physical transmission path from interconnection of the facility in the balancing authority in which the facility is located to the Washington scheduling point or power system
- There is an agreement to dynamically transfer electricity from the facility to a Washington scheduling point or power system

Imported Electricity

WAC 173-441-124(2)

Imported electricity is generated outside Washington state with a final POD within the state and:

- Includes electricity from an organized market, such as the energy imbalance market (EIM)
- Includes imports from linked jurisdictions, but such imports shall be construed as having no emissions

The **Purchasing-selling entity (PSE)** is the entity that is identified on an e-tag for each physical path segment

Imported Electricity

WAC 173-441-124(2)(c)

The Electricity Importer is:

- Identified on the e-tag as the purchasing-selling entity (PSE) on the last segment of the e-tag's physical path with the point of receipt (POR) located outside WA and the POD located inside WA for electricity that is scheduled with an e-tag to a final POD into a BAA located entirely within WA
- The retail provider, marketer, or ACS that conducts an electricity transaction through the EIM that results in EIM power being delivered to final POD in WA for electricity imported through a centralized market
- The PSE on the e-tag at the last point on the physical path that is not the sink for electricity that is imported into the state to a designated scheduling point inside the BAA of a federal power marketing administration

For additional guidance on how to determine if you are an Electricity Importer, refer to **WAC 173-441-124(2)(c)**

Exported Electricity

WAC 173-441-124(2)(r)

Exported electricity - generated inside Washington state and delivered to serve load located outside Washington state

- Includes electricity delivered from a first POR inside WA, to the first POD outside WA, with a final POD outside WA
- Exported electricity delivered across BAAs is documented on e-tags with the first POR located inside WA and the final POD located outside WA

Exported electricity does not include:

- Electricity generated inside WA then transmitted outside of WA, but with a final POD inside WA
- Electricity generated inside WA that is allocated to serve WA retail customers of an MJRP, consistent with a cost allocation methodology approved by the WA UTC and the utility regulatory commission of at least one additional state in which the MJRP provides retail electric service

Exported Electricity

WAC 173-441-124(2)(o)

Electricity exporter – EPEs that deliver exported electricity

- The entity that exports electricity is identified on the e-tag as the PSE on the last segment of the tag's physical path, with the POR located inside WA and the POD located outside WA
- For electricity that is exported from a designated scheduling point in the BAA of a federal power marketing administration, the exporter is the PSE at the first point of the physical path of the e-tag that is not the generation source

EPE Reporting Tool

- EPE Reporting Tool Overview
- EPE Reporting Tool Walkthrough
- Uploading and Signing Reports: GHGReg/WEDGE Overview

Questions? Contact Ecology at GHGReporting@ecy.wa.gov

EPE Tool Overview

The EPE Reporting Tool is an Excel tool used to reported Imported and Exported power as defined in WAC 173-441-124

The EPE contains the following tabs:

- General reporter information (Start Here tab)
- Specified imported electricity
- Unspecified imported electricity
- Unspecified netted electricity
- Specified exported electricity
- Unspecified exported electricity

EPE Tool: Color coding system

- The EPE Reporting tool uses a color-coding system to signify cells that require reporter input on each tab

Color code
Light green cells require reporter input
Light blue cells are optional for a reporter to complete
Light gray cells calculate based on reporter input or are non-input
Light yellow cells indicate a searchable list. Enter * for full list, or start typing to search list

Example

Registered Specified Generation Source	Source ID	Primary Fuel	Location of Generation Source	Total EF	Aggregated First Point of Receipt (POR)	Notes
Select from dropdown. If not listed in dropdown, contact Ecology GHGReporting@ecy.wa.gov	Source ID	Based on largest share by MMBtu	Location of Generation Source	EF Published	Input First POR Code On NERC e-tag at, or near, the Source	
Facility Unit Name	Source ID	Primary Fuel	Jurisdiction Full	EF Published	WAC 173-441-124(2)(c) Aggregated First POI	Spec Imports Notes
Example Generation Source	999999	Natural Gas	WA	.447928		

EPE Tool: Validations

- Excel error messages
- Start Here tab error messages
- Verify Entry cells

Correct before uploading:

- Enter a value for all green cells on the "Start Here" tab.
- Enter the Entity Name on the "Start Here" tab.
- Enter a value for all green and yellow cells in the "Specified Imports" tab.
- Enter a value for all green and yellow cells in the "Unspecified Imports" tab.
- Enter a value for all green and yellow cells in the "Specified Exports" tab.
- Enter a value for all green and yellow cells in the "Unspecified Exports" tab.

Example

Registered Specified Generation Source <i>Select from dropdown. If not listed in dropdown, contact Ecology GHGReporting@ecy.wa.gov</i>	Source ID	Primary Fuel <i>Based on largest share by MMBtu</i>	Location of Generation Source	Total EF	Aggregated First Point of Receipt (POR) <i>Input First POR Code On NERC e-tag at, or near, the Source</i> <i>Searchable list. Enter * for full list, or start typing to search list</i>	E-Tagged or Metered?	MWh measured at the busbar or at the First Point of Delivery (POD) inside WA on NERC e-tag	Transmission Loss Factor Determination	Transmission Loss Factor
Facility Unit Name	Source ID	Primary Fuel	Jurisdiction Full	EF Published	Aggregated First POI	Tagged Metered	Specified Electricity Delivered	Transmission Loss Determination	Transmission Loss Correction
Example Generation Source	999999	Natural Gas	WA	.447928					Verify Entry
Example Generation Source	999999	Natural Gas	WA	.447928	Example.A	Tagged	100	Accounted For	1.00

EPE Tool: Generation Source

WAC 173-441-124(2)(ff)

- Specified Source vs. Unspecified Source
- The registered **specified** generation source is the generation source identified on the physical path of e-tags, where defined points have been established through the affiliated registry
- Specified Sources are registered using the Specified Source Registration tool each reporting year

Example

Registered Specified Generation Source	Source ID	Primary Fuel	Location of Generation Source	Total EF
Select from dropdown. If not listed in dropdown, contact Ecology GHGReporting@ecy.wa.gov	Source ID	Based on largest share by MMBtu	Location of Generation Source	Total EF
Facility Unit Name	Source ID	Primary Fuel	Jurisdiction Full	EF Published
Example Generation Source	999999	Natural Gas	WA	.447928

EPE Tool: Retail and EIM

WAC 173-441-124(2)

Retail Provider - an electric utility, MJRP, or Multijurisdictional consumer-owned utilities

Energy imbalance market (EIM) - the western energy imbalance market operated by the California independent system operator

Start Here Tab

Washington Retail Sales: (report all sales in MWh)	
Are you a Retail Provider in Washington? If yes, continue reporting retail sales information in this section	
Balancing Authority Area in which Retail Customers are Located If not listed in dropdown, enter BAA directly into cell - not a searchable list. <i>N/A if not a retail provider.</i>	
Total Washington Retail Sales - WAC 173-441-124(3)(c) (MWh)	
Data Source for Reported Retail Sales Value (Optional - Required for EIM Purchasers) Add description if "Other"	
Electrification - WAC 173-441-124(3)(c)(ii) - Optional Subset of retail sales serving electrification of shipping ports, truck stops, and motor vehicle (MWh)	
EIM Purchaser:	
Did you purchase any electricity through the Energy Imbalance Market (EIM) to serve Washington load in the data year?	
EIM Power Purchased (MWh)	

EPE Tool: e-Tag, POR, and POD

WAC 173-441-124(3)

- Examples of reporting POR and POD Codes

Example: Spec Exports

<p>Washington Generation Source</p> <p>Select from dropdown. If not listed in dropdown, contact Ecology GHGReporting@ecy.wa.gov</p>	<p>Source ID</p>	<p>Aggregated By Final Point of Delivery (POD) Input Final POD Code</p> <p>On NERC e-tag at, or near, the Sink</p> <p>Searchable list. Enter * for full list, or start typing to search list</p>	<p>Location of Final Point of Delivery (POD)</p>	<p>E-Tagged or Metered</p>
<p>Facility_Unit_Name</p>	<p>Source ID</p>	<p>WAC 173-441-124(3)(a)(vii) Aggregated_Final_POD</p>	<p>Jurisdiction_Full_Name</p>	<p>Tagged_Metered</p>
<p>Example Generation Source</p>	<p>999999</p>	<p>AB.BC</p>	<p>WA</p>	<p>Tagged</p>

Example: Unspec Imports

<p>Aggregated First Point of Receipt (POR) Input First POR Code On NERC e-tag at, or near, the Source</p> <p>Searchable list. Enter * for full list, or start typing to search list</p>	<p>Location of First Point of Receipt (POR)</p>	<p>Is this line item from a lesser of calculation? If so, select the generation source below (as reported in Spec Imports)</p> <p>Leave blank if not applicable</p> <p>Searchable List</p>	<p>E-Tagged or Metered?</p>	<p>MWh measured at the busbar or at the First Point of Delivery (POD) inside WA on NERC e-tag</p>	<p>Default emission factor for unspecified electricity imports per WAC 173-444-040.</p>	<p>Transmission Loss Factor Accounted for in EF.</p>
<p>WAC 173-441-124(2)(c) Aggregated First POR</p>	<p>Jurisdiction_Full_Name</p>	<p>Lesser_of?</p>	<p>Tagged_Metered</p>	<p>WAC 173-441-124(3)(a)(iii) Unspecified Electricity Delivered</p>	<p>(MT CO2e/MWh) Default Emissions</p>	<p>WAC 173-441-124(3)(b) Emission Loss Correction Factor</p>
<p>Example.A</p>	<p>WA</p>	<p></p>	<p>Tagged</p>	<p>1</p>	<p>0.437</p>	<p>1.000</p>

EPE Tool: FJD Assessment

WAC 173-441-124(2)(bb)

- Per WAC 173-441-124(2)(d), the First Jurisdictional Deliverer is the owner or operator of an electric generating facility in Washington state or an electricity importer.
- Per WAC 173-441-142(3)(d), retail providers that report as electricity importers or exporters also must separately report electricity imported from specified and unspecified sources by other electric power entities to serve their load, designating the electricity importer.

Example

First Jurisdictional Deliverer (FJD) Assessment	
Are YOU the PSE on the NERC eTag in the Physical Path table on the last Washington border crossing, or meet the FJD definition	Name of FJD Answer only if <u>not</u> FJD <i>Select from dropdown; if unlisted enter name into cell</i>
WAC 173-441-124(2)(bb)	
Are You First Deliverer ▾	First Deliverer List ▾
Yes	

EPE Tool: Lesser of Analysis

WAC 173-441-124(3)(b)(ii)(B)(VI)

- A lesser of analysis is applicable to imports from specified sources for which ecology has calculated an EF of zero, and for imports from Washington renewable portfolio standard (RPS) eligible resources
- Comparison between imports listed on e-Tag with the actual generation
 - If the import listed on the e-Tag is greater than scheduled generation, the generation is claimed as a specified import and the balance from the e-Tag is “substitute power” and claimed as an unspecified import
 - If the scheduled generation is greater than the tagged import, electricity on the e-Tag can be claimed as a specified import

Example

First Jurisdictional Deliverers Only		
Meter Data, & Lesser of Analysis WAC 173-441-124(3)(b)(ii)(B)(V) and (VI)		
Is this a zero emission or RPS eligible resource?	Is this resource excluded from the meter data requirement? <i>Select the applicable exclusion</i>	Is a Lesser of Analysis required?
Meter Data Zer	Meter Data Resource Excluded	Meter Data Le
		Verify Entry

EPE Tool: Netting

WAC 173-441-124(3)(a)(iii)(C)

- The amount of electricity imports of unspecified electricity are netted by exports of unspecified electricity to any jurisdiction not covered by a linked program by the same entity within the same hour
 - Reported using the **Unspec Netting** tab in the EPE Tool workbook on an hourly basis

Walkthrough

Download the EPE Reporting Tool [here](#)

GHGReg/WEDGE Overview

To upload annual GHG reports:

1. Log in to [Secure Access WA \(SAW\)](#).
2. Access the **Air Quality Application Portal**.
3. Open the **GHGReg/WEDGE** application.

The screenshot shows the Secure Access Washington (SAW) portal interface. It is divided into three main sections:

- Section 1 (Left):** A green header with the Washington State seal and the text "Your login for Washington state." Below this are buttons for "Sign Up!", "GET HELP", and "Español". Underneath is a "LOGIN" section with input fields for "Username" and "Password", and a "Submit" button.
- Section 2 (Middle):** A white box with a green header "ADD A NEW SERVICE". Below this is a list of services, with "Air Quality Application Portal" selected. It includes a green "Access Now" button and a red "Remove from my list" link. A note states: "Approval for the Air Quality Application Portal is automatic. If it shows as Pending please cancel the request by clicking the red Remove from my list and confirm by clicking REMOVE. Then re-request the Air Quality Application Portal." There are also links for "Contact AQPortal help desk" and "Remove from my list".
- Section 3 (Right):** A white box with a blue header "Greenhouse Gas Registration (GHGReg/WEDGE)". Below this is the text: "GHG Reporters and Verifiers – Register to report GHG emissions (WAC 173-441) and submit annual reports (NOT for state agencies, HFCs, or CFS)". At the bottom is a blue button labeled "Go To GHGReg/WEDGE".

Red callout boxes with numbers 1, 2, and 3 are placed over the "Sign Up!" button, the "Access Now" button, and the "Go To GHGReg/WEDGE" button, respectively.

Request the GHGReg/WEDGE Training and User Manual: GHGReporting@ecy.wa.gov

GHGReg/WEDGE Overview

4. In the GHGReg app, click on the **Enter Data** tab.
5. Enter **Reporter Information** and select **Next**.

The image shows two screenshots from the GHGReg/WEDGE app. The left screenshot displays the 'GHG Registration' app's main menu with a green background. A red circle with the number '4' highlights the 'Enter Data' option, which is also enclosed in a red rectangular box. The right screenshot shows the 'Reporter Information' form, which is highlighted with a red border and a red circle with the number '5' in the top right corner. The form is divided into two sections: 'User Information' and 'Reporter Information'. The 'User Information' section includes fields for First Name (Emma), Last Name (Barrett), Organization Name (ECY), and Email (emba461@ecy.wa.gov), along with an optional comments field. A green 'NEXT' button is located at the bottom left of this section. The 'Reporter Information' section includes a 'Reporter Name (Drop Down)' menu (set to 'Please Select'), an 'EPA GHG ID' field, a 'Mailing Address' field, 'City', 'State', and 'ZIP Code' fields, and a 'Reporting Year' dropdown menu (set to 2022).

Request the GHGReg/WEDGE Training and User Manual: GHGReporting@ecy.wa.gov

GHGReg/WEDGE Overview

6. Select **EPE Reporting Tool** option.
7. Upload the EPE Reporting Tool Excel file.
8. As a DR or ADR, sign the uploaded report electronically.

Step 1. Select task:

6

- Specified Sources Registration Tool.** This is an Excel tool provided by Ecology.
- REQUIRED: EPE Reporting Tool (xlsx).** This is an Excel tool provided by Ecology to report EPE emissions and information required by WAC 173-441.
- MJRP Tool (xlsx).** Required for Multijurisdictional retail providers. This is an Excel tool provided by Ecology.
- ACS Tool (xlsx).** Required for Asset controlling suppliers. This is an Excel tool provided by Ecology.
- Other (PDF or MS Office format).** This can be supplemental information you would like to provide or any file that was requested by Ecology.

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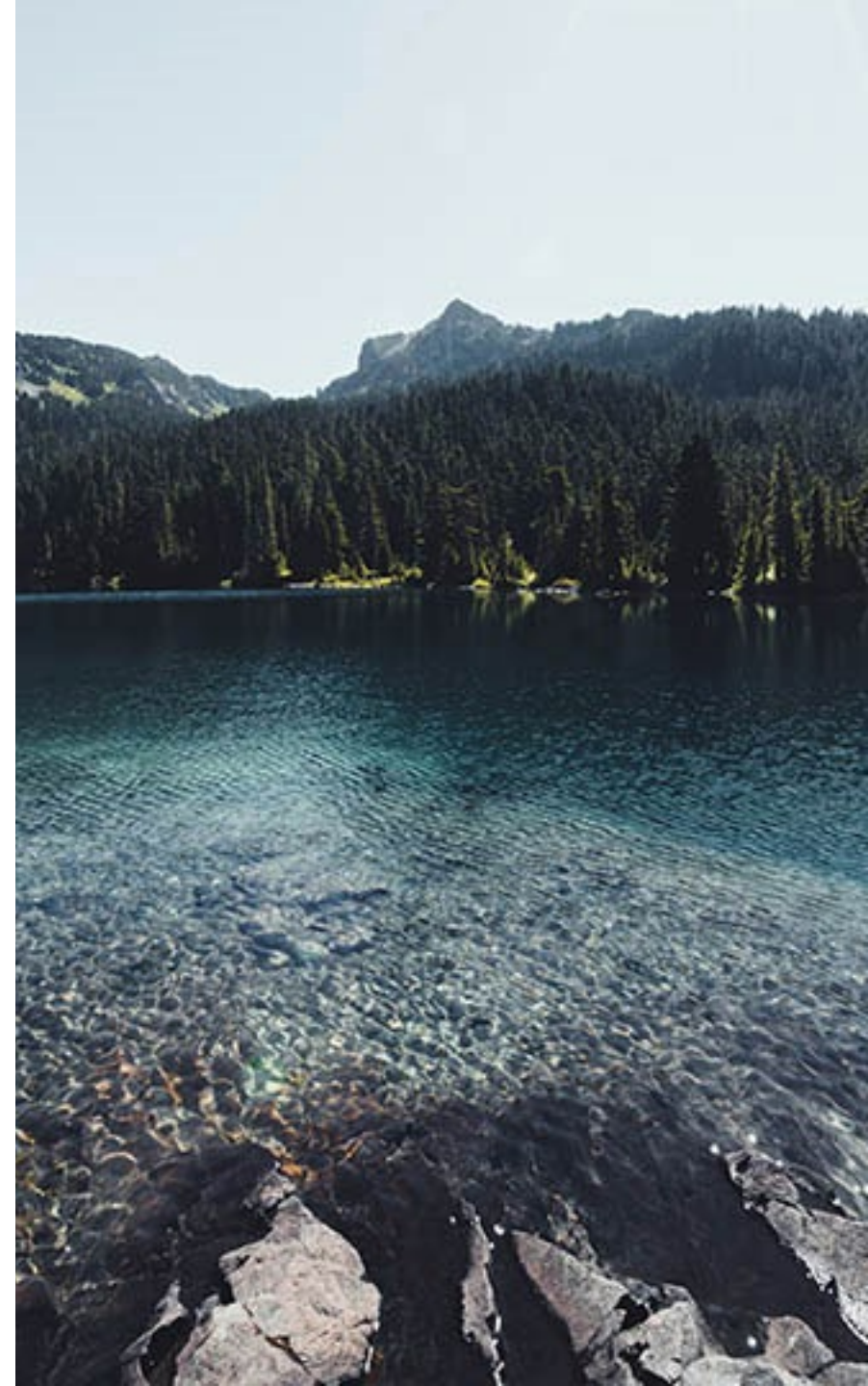
Request the GHGReg/WEDGE Training and User Manual: GHGReporting@ecy.wa.gov

Auction Participant Resources

For CITSS or Auction Platform trainings, guidance, and resources, please refer to our [Auctions Trainings and Resources webpage](#).

You can also [sign up for Auctions email alerts to stay up-to-date on future trainings, auction notices, and other information](#).

For direct support, contact CCAuctions@ecy.wa.gov



Thank you

Visit our [CCA GHG Reporting website](#) for additional EPE Reporting information and reporting resources.

Questions?

Contact Ecology at
GHGReporting@ecy.wa.gov

