CITSS Compliance Management Guide

Table of Contents

| Introduction | 4 |
|---|---|
| Compliance Overview | 4 |
| Compliance Reports | 4 |
| Emissions | 7 |
| True-Up Quantity | 8 |
| Compliance Obligations | 8 |
| Compliance Obligation Details | 9 |
| Compliance Obligation Information | |
| Instruments in Compliance Account to be Retired | |
| Remaining True-Up Quantity | |
| Facility Emissions | |
| Assigned True-Up Quantity | |
| Compliance Obligation (Data Export) | |
| Budget Years | |
| Obligation Type | |
| CITSS Entity ID | |
| Eligible Instruments for Retirement | |
| Notifications | |
| Appendices | |
| Appendix A - Access to CITSS | |
| Acknowledgments | |

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.

TABLE OF FIGURES

| Figure 1: CITSS Home Page | 5 |
|---|---|
| Figure 2: Representative Reports page | 6 |
| Figure 3: Emissions Report | 7 |
| Figure 4: True-Up Quantity Report | 8 |
| Figure 5: Compliance Obligations page | 9 |
| Figure 6: Compliance Obligation Information | |
| Figure 7: Instruments in Compliance Account to be Retired table | |
| Figure 8: Compliance Retirement Transfers table | |
| Figure 9: Remaining True-up Quantity | |
| Figure 10: Facility Emissions table | |
| Figure 11: Assigned True-up Quantity table | |
| Figure 12: Compliance Obligations (Data Export) Report page | |
| Figure 13: Eligible Instruments for Retirement page | |
| Figure 14: Eligible Instruments for Retirement page | |
| Figure 15: CITSS Home page with notifications displayed under "Reminders" | |
| Figure 16: Notifications page | |
| Figure 17: Notification Detail page | |

Glossary

- AVA Account Viewing Agent
- AAR Alternate Account Representative
- PAR Primary Account Representative
- Annual 30% of the covered emissions (or AEL) due November the year following the budget year.
 Obligation
- Assigned Emissions Level (AEL)
 In the absence of an annual greenhouse gas report which meets reporting requirements under WAC 173-441-050, and/or third-party verification requirements under WAC 173-441-085, Ecology assigns an emissions level which the compliance obligation will be based upon.
- Budget Year The year in which covered emissions for an obligation occurred.
- CCA
 Climate Commitment Act
- CITSS Compliance Instrument Tracking System Service
- Covered The reported and verified emissions for which a compliance obligation is based upon.
- Covered Entity Any entity or facility covered under WAC 173-446 of the Climate Commitment Act required to participate in the program
- GMP An entity that is not responsible for greenhouse gas emissions but participates in the market. May be an individual or an organization.
- Opt-In Entity An entity that is responsible for greenhouse gas emissions in Washington that is not a Covered Entity but voluntarily participates in the program
- Participant Participating natural person or legal entity in the program.
- Quadrennial Compliance Obligation
 The full obligation for remaining covered emissions that has not yet been met by annual compliance events.
- Rule Chapter 173-446 WAC: Climate Commitment Act Program Rule
- Shortfall The difference between the amount that was actually surrendered for a compliance obligation and what should have been surrendered. A 1:1 penalty.
- True-up and True-up Quantity
 Emissions Intensive, Trade Exposed facilities are provided allocation based upon emissions and production data of two years prior to the allocation year. When final verification of emissions and production data are available, Ecology adjusts the allocation equal to the change in emissions and production data. The True-up allowances are of vintage two years later than the initial allocation budget year. True-up Quantity is a value of future vintage allowances which may be used

toward a current compliance obligation.

- Untimely A penalty of three times the shortfall amount. Surrender Obligation
- WCI, Inc Western Climate Initiative, Inc

Introduction

The Compliance Instrument Tracking System Service (CITSS) Compliance Management Guide assists account representatives and entities in understanding compliance obligations.

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

- 1. <u>CITSS New User Registration and User Profile Management Guide</u>
- 2. CITSS Entity Account Application Guide
- 3. <u>CITSS Compliance Instrument Transfers Guide</u>
- 4. CITSS Compliance Management Guide

Additional guidance and updated versions of publications will be made available on the <u>Auctions and</u> <u>Trading Trainings and Resources Webpage</u>.

Compliance Overview

Compliance with the Washington cap-and-invest program requires covered and opt-in entities to surrender compliance instruments (allowances and/or offset credits) equal to the compliance obligation for a given period of time. Each metric ton of CO₂-equivalent (MTCO₂-e) must be covered by a compliance instrument (an allowance or offset credit). On the deadline of each compliance obligation, CITSS removes and retires instruments from the entity's compliance account.

Emissions that are verified pursuant to WAC 173-441-085 or an Assigned Emissions Level (AEL) pursuant to WAC 173-441-086, are the basis for which compliance obligations are calculated under the cap-and-invest program.

Compliance Reports

CITSS provides detailed reports and tables for Primary Account Representatives (PARs), Alternate Account Representatives (AARs), and Account Viewing Agents (AVAs) to consult during the compliance process. Information for current and/or future obligations are accessible in CITSS upon approval.

To access compliance information, select "Representative Reports" in the left-hand menu on the home page (Figure 1).

Figure 1: CITSS Home Page

| Contact Us | My Account | S | | | | | |
|-----------------------|-----------------|---------------------------|----------------------------------|-------------------|---------------------|-------------------|---------|
| Ny User Profile | Name | Operating Name | Account Type | Account Number | Jurisdiction | Account Status | Actions |
| Account Registration | WA Company A | WA Operating Company A | (g) Annual Allocation Holding | WA1000-996 | Washington State | Active | View |
| epresentative Reports | WA Company A | WA Operating Company A | Limited Use Holding | WA1000-997 | Washington State | Active | View |
| lossary | WA Company A | WA Operating Company A | Compliance | WA1000-998 | Washington State | Active | View |
| | WA Company A | WA Operating Company A | General | WA1000-999 | Washington State | Active | View |
| | WA Company B | WA Operating Company B | (c) Annual Allocation Holding | WA1001-992 | Washington State | Active | View |

The "Compliance Reports" section (Figure 2) contains six reports related to compliance:

- 1. **EMISSIONS:** Provides information of emissions entered into CITSS which calculate applicable compliance obligations.
- 2. **TRUE-UP QUANTITY:** Applicable only to Emissions Intensive, Trade Exposed (EITE) facilities which receive no cost allocation pursuant to WAC 173-446-220(2). This is the amount of future vintage allowances that may be used to meet specific compliance obligations.
- 3. **COMPLIANCE OBLIGATIONS:** Displays details of current and previous compliance obligations.
- 4. COMPLIANCE OBLIGATIONS (DATA EXPORT): A CSV export of the Compliance Obligations.
- 5. **ELIGIBLE INSTRUMENTS FOR RETIREMENT:** Generates a list of instruments in the order which they are retired for specific compliance obligations from an entity's compliance account.
- 6. **NOTIFICATIONS:** Provides a list of obligations that are not associated with covered emissions. An example includes a notification for when a Shortfall is not surrendered.

Figure 2: Representative Reports page

| Log Out Home Contact Us My User Profile | Representative Reports This page allows a user to view or download Representative Reports. Representative Reports provide information accounts. Most Representative Reports are configurable, allowing users to select criteria for custom reports. The transfers. The Transfer Event Audit Report lists more detailed information about each transfer. The Entity Account Entity Monthly Statement provides a statement of account balances and transfers. The Emissions Report presents Description accounts are presented by the Description accounts are presented by the Description accounts. | to support user management of CITSS Fransfer History lists compliance instrument Balance Report lists account balances. The facility emissions. The True-Up Quantity | | | | | | |
|--|---|---|--|--|--|--|--|--|
| Representative Reports | Report lists the true-up quantity assigned by year. The Compliance Obligations Report allows access to detailed information and status for current or past compliance obligations. The Compliance Obligation (Data Export) Report presents approved compliance obligations. The Eligible Instruments for Retirement Report provides a list of compliance instruments that can be used during a selected obligation period. The Notifications Report provides information about current or past notifications. To prepare a Representative Report, select the "Continue" button in the Action column on the right. CITSS will open a report screen to select criteria for the selected report. Transfer and Balance Reports | | | | | | | |
| | Report Name Action Transfer History Continue | | | | | | | |
| | Transfer Event Audit Report Entity Account Balance Report | Continue | | | | | | |

Event Reports

| Report Name | Action |
|--------------------|----------|
| Event Applications | Continue |

Continue

Compliance Reports

Entity Monthly Statement

| Report Name | Action |
|--------------------------------------|----------|
| Emissions | Continue |
| True-Up Quantity | Continue |
| Compliance Obligations | Continue |
| Compliance Obligations (Data Export) | Continue |
| Eligible Instruments for Retirement | Continue |
| Notifications | Continue |

To display any compliance report, select "Continue" in the "Action" column of the desired report. Each report is described in detail in following sections.

**NOTE: Search results are presented in a table and may span multiple pages. The table can sort the data in ascending or descending order by clicking the header for the desired column. To display other pages, select the desired page from the lower left corner of the table. To display more results, increase the "results per page" value. To export the table into either a CSV or Excel document, select the desired file type from the lower right corner of the table. Select "Clear" to reset the table to its default view.

Emissions

The "Emissions" page (Figure 3) provides the emissions uploaded into CITSS by budget year for each facility associated with an entity the PAR/AAR represents. The table can be exported as either a CSV or Excel document.

The search function allows PARs/AARs to filter by budget year, CITSS entity ID, Entity Legal Name, Facility Name, and GHG Reporting ID. Select the "Search" button to filter based on any entered criteria.

Figure 3: Emissions Report

| Log Out | Emissions | | | | | | |
|---|---|----------------------|--|--|--|--|--|
| Home Contact Us My User Profile Account Registration | This page allows a user to produce an Emissions Report. The search function allows searching by Budget Year, CITSS Entity ID, Entity Legal Name, Facility Name, and GHG Emissions Reporting ID. Selecting the "Search" button generates the Emissions Report for the selected criteria. The search results are presented in tabular form in the bottom half of the screen and may be more than one page in length. The table is sortable (ascending or descending) by clicking on the column titles. Additional pages are accessed using the page numbers below the table on the left. This table can be exported in its entirety to CSV or Excel format by selecting the appropriate link below the table on the right. Selecting the "Clear" button clears the search fields. | | | | | | |
| Representative Reports | Budget Year | 2013 2014 2015 | | | | | |
| | CITSS Entity ID | | | | | | |
| | Entity Legal Name | | | | | | |
| | Facility Name | | | | | | |
| | GHG Emissions Reporting ID | | | | | | |
| | Results per page | | | | | | |
| | Search Clear | | | | | | |

| Budget Year | CITSS Entity ID | Entity Legal Name | Facility Name | GHG Emissions Reporting ID | Emissions (metric tons CO ₂ e) | Updated Date/Time | |
|---------------------|--------------------|----------------------|------------------|-------------------------------|--|----------------------------|--|
| 2023 | WA1000 | WA Company A | WA Facility A | 1111 | 6,803,469 | 2024-08-29 17:41:01 EDT | |
| 2023 | WA1000 | WA Company A | WA Facility B | 2222 | 405,038 | 2024-08-29 17:41:01 EDT | |
| 2023 | WA1001 | WA Company B | WA Facility 1 | 4444 | 5,566,951 | 2024-08-29 17:41:01 EDT | |
| 2023 | WA1001 | WA Company B | WA Facility 2 | 4444 | 6,013,049 | 2024-08-29 17:41:01 EDT | |
| CSV Excel 4 records | | | | | | | |

True-Up Quantity

Define True-up

The "True-Up Quantity" page (Figure 4) provides the True-Up Quantity in CITSS by budget year for each facility associated with an entity the PAR/AAR represents. The table can be exported as either a CSV or Excel document.

The search function allows PARs and AARs to filter by budget year, CITSS entity ID, Entity Legal Name, Facility Name, and GHG Reporting ID. Select the "Search" button to filter based on any entered criteria.

The budget year in the table is not the Assigned Vintage of the True-Up Quantity but is the year in which emissions occurred that are informing the amount of the True-Up Quantity. For a given budget year, the Assigned Vintage of True-Up Quantity is two years later. For example, True-Up Quantity for budget year 2023 would be assigned vintage 2025.

Figure 4: True-Up Quantity Report

| Log Out | True-U | p Quanti | ty | | | | | | | |
|---|--|---|--|---------------|---------------|-------------------|----------------------------|--|--|--|
| Home Contact Us My User Profile Account Registration | This page allow Facility Name, results are pres the page numb on the right. Se | This page allows a user to produce a True-Up Quantity Report. The search function allows searching by Budget Year, CITSS Entity ID, Entity Legal Name, Facility Name, and GHG Emissions Reporting ID. Selecting the "Search" button generates the True-Up Quantity Report for the selected criteria. The search results are presented in tabular form. The table is sortable (ascending or descending) by clicking on the column titles. Additional pages are accessed using the page numbers below the table on the left. This table can be exported in its entirety to CSV or Excel format by selecting the appropriate link below the table on the right. Selecting the "Clear" button clears the search fields. | | | | | | | | |
| Representative Reports Glossary | Budget Year | | 2013 () 2014 () 2015 () | | | | | | | |
| | CITSS Entity I | D | | | | | | | | |
| | Entity Legal N | ame | | | | | | | | |
| | Facility Name | | | | | | | | | |
| | GHG Emission | ns Reporting ID | | | | | | | | |
| | Results per pa | age | 10 🗸 | | | | | | | |
| | Search | Clear | | | | | | | | |
| | Rudget | CITES | Entitul anal | Facility | CHC Emissions | Assigned True IIn | Undeted | | | |
| | Year | Entity ID | Name | Name | Reporting ID | Quantity | Date/Time | | | |
| | 2023 | WA1000 | WA Company A | WA Facility A | 1111 | 500 | 2024-08-29 17:52:59 EDT | | | |
| | 2023 | WA1001 | WA Company B | WA Facility 2 | 4444 | 800 | 2024-08-29 17:52:59 EDT | | | |
| | | | | | | <u>CS</u> | <u>SV Excel</u> 2 records | | | |

Compliance Obligations

Information for compliance obligations is available when the Department of Ecology: 1) uploads emissions in CITSS and 2) approves the obligation in CITSS. This timeline can vary, but typically falls within late September to early October. PARs and AARs receive an email from CITSS when the compliance obligation is available for review.

The "Compliance Obligations" page (Figure 5) allows PARs, AARs, and AVAs to search for and view compliance obligations entities which they represent. The search can be filtered by budget year(s), obligation type, CITSS entity ID, and Entity Legal Name. Select the "Search" button to filter based on any entered criteria.

The page defaults to show "Current" compliance obligations, but past obligations can be accessed by changing the tab at the top of the page to "Past."

To view the "Compliance Obligation Details" page, select the hyperlinked CITSS Entity ID.

Figure 5: Compliance Obligations page.

| Log Out | Compliance Obligations | | | | | | | | | |
|---|--|----------------------------|-----------------------------|--------------------|-------------------------|--------------------------|----------------------------|--|--|--|
| Home Contact Us My User Profile Account Registration Representative Reports | This page allows users to view information regarding current or past Compliance Obligations by selecting the appropriate tab at the top of the page. The Obligation Period column identifies the Budget Year(s) and the type of Compliance Obligation. Selecting the hyperlink in the CITSS Entity ID column switches to the Compliance Obligation Detail page which presents additional information about the selected Compliance Obligation. If the Compliance Obligation status is In Progress or Not Processed, the hyperlink is unavailable. The search function allows searching by Budget Year(s), Obligation Type, CITSS Entity ID, and Entity Legal Name. The search results are presented in tabular form in the bottom half of the screen and may be more than one page in length. The table is sortable (ascending or descending) by clicking on the column titles. Additional pages are accessed using the page numbers below the table on the left. This table can be exported in its entirety to CSV or Excel format by selecting the appropriate link below the table on the right. Selecting the "Clear" button clears the search fields. | | | | | | | | | |
| | Current Past | Current Past | | | | | | | | |
| | Budget Year(s) | | 2013 2013-2014 2015 | | | Î | | | | |
| | Obligation Type Annual Triennial Quadrennial | | | | | | | | | |
| | CITSS Entity ID | | | | | | | | | |
| | Entity Legal Nar | ne | | | | | | | | |
| | Results per page | 2 | 10 🗸 | | | | | | | |
| | Search Clea | r | | | | | | | | |
| | Obligation Period | Compliance Deadline | Obligation Period Status | CITSS Entity ID | Entity Legal Name | Compliance Obligation | Updated Date/Time | | | |
| | 2023 Annual | 2024-11-01 20:00:00 EDT | Open | <u>WA1000</u> | WA Company A | 2,162,553 | 2024-08-29 18:13:24 EDT | | | |
| | 2023 Annual | 2024-11-01 20:00:00 EDT | Open | <u>WA1001</u> | WA Company B | 3,474,000 | 2024-08-29 18:13:40 EDT | | | |
| | | | | | | <u>CSV</u> | Excel 2 records | | | |
| | | | | | | | | | | |

Compliance Obligation Details

The compliance obligation is calculated based upon covered emissions or AEL entered into CITSS. Once emissions or AEL are entered into CITSS and obligations are approved, PARs, AARs, and AVAs can review "Pending" obligations in detail prior to the obligation deadline.

PARs, AARs, and AVAs can access "Compliance Obligations Details" pages for current and past obligations. The information presented for current obligations differs from that of past obligations. For example, a current obligation would indicate instruments **to be retired**, while a past obligation would present as instruments **that were retired**.

The "Compliance Obligation Details" page contains up to five sections:

- Compliance Obligation Information
- Instruments in the Compliance Account to be Retired
- Remaining True-Up Quantity

- Facility Emissions
- Assigned True-Up Quantity

Each section is described in detail below.

Compliance Obligation Information

This section (Figure 6) provides an overview of basic information relating to the current or past obligation. The information at the top of this section includes the obligation period, CITSS Entity ID, CITSS Legal Name, Entity Operating Name, Compliance Account Number, Compliance Status, Compliance Deadline, and the Updated Date/Time.

- The Compliance Status for <u>current obligations</u> may be either <u>PENDING FULFILLED</u> or <u>PENDING</u> UNFULFILLED. "Pending" means the compliance deadline has not yet passed for the obligation.
 - If the status shows "fulfilled," the entity has enough instruments in the compliance account to meet the obligation.
 - If the status shows "unfulfilled," the entity does not have enough instruments in the compliance account to meet the obligation.
- The Compliance Status for <u>past obligations</u> may be either Fulfilled or Unfulfilled.
 - If the status shows "fulfilled," the entity had enough instruments in the compliance account to meet the obligation.
 - If the status shows "unfulfilled," the entity did not have enough instruments in the compliance account to meet the obligation.

The rest of the information in this section presents like a math equation:

- **COMPLIANCE OBLIGATION:** The number of instruments the entity is required to hold in its compliance account by the compliance deadline. **Annual Obligations are equal to 30% of the annual emissions.** A table of "Facility Emissions" is available on this page.
- **INSTRUMENTS RETIRED:** The number of instruments held in the compliance account at the compliance deadline. For a current obligation, this value will be "0."
- **BALANCE TO FULFILL OBLIGATION:** Indicates the difference between Compliance Obligation and the Instruments Retired. This value will equal the obligation until the compliance is processed November 1.
- **OFFSET LIMITS:** Washington State allows offset credits to meet a portion of a compliance obligation, subject to limits based on the type of offset credit:
 - Direct Environmental Benefits to the State on Tribal Lands Offset Limit: Provides the maximum number of this offset type which an entity may use for the obligation. This value is limited to 3% of annual emissions.
 - Direct Environmental Benefits to the State Not on Tribal Lands Offset Limit: Provides the maximum number of this offset type which an entity may use for the obligation. This value is limited to 5% of annual emissions.
- **INSTRUMENTS IN COMPLIANCE ACCOUNT TO BE RETIRED:** The number of eligible instruments held in the compliance account that will be used for the compliance obligation.
- ADDITIONAL INSTRUMENTS NEEDED IN COMPLIANCE ACCOUNT: Indicates the difference between the obligation and instruments in the compliance account to be retired. This is the number of instruments that are still needed to be placed into the compliance account by the compliance deadline.

Figure 6: Compliance Obligation Information

| Compliance Obligation Inform | ation | | |
|----------------------------------|--------------------------|-----|--|
| Obligation Period | 2023 Annual | | |
| CITSS Entity ID | WA1000 | | |
| Entity Legal Name | WA Company A | | |
| Entity Operating Name | WA Operating Compan | yА | |
| Compliance Account Number | WA1000-998 | | |
| Compliance Status | Pending Unfulfilled? | | |
| Compliance Deadline | 2024-11-01 20:00:00 E | DT? | |
| Updated Date/Time | 2024-08-29 18:13:24 EDT? | | |
| | | | |
| Compliance Obligation | 2,162,5 | 53 | |
| Instruments Retired | | 0 | |
| Balance to Fulfill Obligation | 2,162,55 | 3 ? | |
| | | | |
| Direct Environmental Benefits to | 216,255 ? | | |
| Limit | | | |
| Direct Environmental Benefits to | 360,425 ? | | |
| the State Not on Tribal Lands | | | |
| Instruments in Compliance | 1 12 | 5 ? | |
| Account to be Retired | 1, 12 | ~ | |
| Additional Instruments Needed in | 2,161,42 | 8 ? | |
| Compliance Account | | | |

Instruments in Compliance Account to be Retired

This section (Figure 7) shows the instruments in the compliance account that are eligible to meet the obligation. This section will only appear for current obligations. The table displays the instruments by vintage and by type (allowance or offset credit).

| Instruments in Compliance Account to be Retired ? | | | | | | | | | |
|---|---------------------|-----------|--------------|--|----------------------|----------|----------------------|--|--|
| Vintage | Jurisdiction | Туре | Sub- Type | Offset Type | Offset Project ID | Quantity | Receiving Account | | |
| 2016 | Washington State | Offset | | Ozone Depleting Substances Projects | WA2016-1 | 25 | Retirement | | |
| 2023 | | Allowance | | | | 1,100 | Retirement | | |

Figure 7: Instruments in Compliance Account to be Retired table

Completed Retirement Transfers

This section will retitle from "Instruments in Compliance Account to be Retired" to "Completed Retirement Transfers" (Figure 8) after the compliance period has ended and compliance has processed, and instruments were transferred from the compliance account to the Jurisdiction Retirement Account.

Figure 8: Compliance Retirement Transfers table

| fransfer D | Vintage | Jurisdiction | Туре | Sub-Type | Offset Type | Offset Project ID | Quantity | Receiving Account |
|---------------|---------|---------------------|-----------|--|---|----------------------|------------|----------------------|
| 181088 | 2023 | Washington State | Offset | | Ozone Depleting Substances Projects | 1701 | 1,607,798 | Retirement |
| 181089 | 2024 | Washington State | Offset | | Livestock Projects | 1701-D | 2,679,663 | Retirement |
| 181090 | | | Allowance | Price Containment Reserve Allowance | | | 10,000,000 | Retirement |

Remaining True-Up Quantity

This section (Figure 9) shows only for entities which are assigned True-up. The table displays the eligible True-up Vintages by year and amount. This table updates once instruments have been retired from the compliance account that are of the eligible future vintage.

Figure 9: Remaining True-up Quantity

| F | Remaining True-up Quantity ? | |
|---|------------------------------|--------------------|
| | Eligible True-up Vintages | Remaining Quantity |
| 1 | 2024 | 0 |
| | 2025 | 500 |
| | | |

Facility Emissions

This section (Figure 10) shows the emissions entered into CITSS by the Department of Ecology. The sum of these emissions calculates the entity's compliance obligation for the given obligation.

Figure 10: Facility Emissions table

| Budget Year | Facility Name | Facility Operating Name | GHG Emissions Reporting ID | Emissions (metric tons CO2e) |
|-------------|---------------|-------------------------|----------------------------|------------------------------|
| 2023 | WA Facility A | WA Operating Facility A | 1111 | 6,803,46 |
| 2023 | WA Facility B | WA Operating Facility B | 2222 | 405,0 |

Assigned True-Up Quantity

This section (Figure 11) shows the total True-Up quantity of each assigned vintage the entity has been assigned by facility. This table does not update after each compliance obligation deadline.

Figure 11: Assigned True-up Quantity table

| Assigned True | -up Quantity ? | | | |
|---------------|-------------------------|----------------------------|------------------|--------------------|
| Budget Year | Facility Operating Name | GHG Emissions Reporting ID | Assigned Vintage | Assigned Quantity |
| 2023 | WA Operating Facility A | 1111 | 2025 | 500 |
| | | | | CSV Excel 1 record |
| | | | | |

Compliance Obligation (Data Export)

PARs, AARs, and AVAs may download an export of an entity's compliance obligation(s) as a CSV document. Representatives must select a budget year in order to generate a report. The "Obligation Type" and "CITSS Entity ID" fields are optional to narrow the results of the export (Figure 12).

Figure 12: Compliance Obligations (Data Export) Report page

| Log Out | Compliance Obligations (Data Export) Report |
|---------------------------------------|--|
| Home Contact Us My User Profile | This page allows users to produce a Compliance Obligations (Data Export) Report. The report summarizes the status of current and past Compliance Obligations including Compliance Status, Compliance Deadline, the Compliance Obligation, the Offset Limit, the number of instruments that are needed or have been retired, and other details. |
| Account Registration | The search function allows searching by Budget Years, Obligation Type, and CITSS Entity ID. The Obligation Type and CITSS Entity ID selections are optional. Selecting the "Submit" button generates the Compliance Obligation Report. Report generation may take several minutes. CITSS will prompt the use |
| Representative Reports | to return to this page to check if the report is ready. This webpage can be refreshed by selecting the browser refresh button, pressing F5 on most Windows computers, or using command-R in Mac and Linux. A hyperlink will be presented on this page when the report is ready to be viewed or downloaded in CSV format. |
| Glossary | |
| | Budget Years * 2023-2026 V |
| | Obligation Type Select 🗸 |
| | CITSS Entity ID |
| | Submit |

The below are the fields included in the export

- CITSS Entity ID
- Entity Legal Name
- Entity Operating Name
- Compliance Account Number
- Budget Years
- Obligation Type
- Compliance Obligation
- Offset Limit
- Adjusted Offset Limit
- Direct Environmental Benefits to the State on Tribal Lands Offset Limit
- Direct Environmental Benefits to the State Not on Tribal Lands Offset Limit
- Allowances Retired
- Adjusted Allowances Retired
- Offsets Retired
- Adjusted Offsets Retired
- Direct Environmental Benefits to the State on Tribal Lands Offsets Retired
- Direct Environmental Benefits to the State Not on Tribal Lands Offsets Retired

- Total Instruments Retired
- Adjusted Total Instruments Retired
- Allowances in Compliance Account to be Retired
- Offsets in Compliance Account to be Retired
- Balance (Shortfall)
- Compliance Status
- Compliance Deadline
- Obligation Updated Date/Time
- Date/Time Report Generated

Budget Years

To generate a report, a user must select a budget years range. The obligation type and CITSS Entity ID search fields are optional.

Obligation Type

The obligation type is optional. The obligation types available to search include:

- Triennial (California and Quebec only)
- Quadrennial
- Shortfall
- Untimely Surrender
- Under-Reported Emissions
- Under-Reported Emissions Shortfall
- Under-Reported Emissions Untimely Surrender
- Offset Invalidation Shortfall
- Offset Invalidation Untimely Surrender

Annual

While Annual obligations are not displayed as an option to select, Annual obligations will automatically generate in the absence of selecting an obligation type.

Annual obligations are equal to 30% of the annual emissions from the previous year.

Quadrennial

This search criteria results in the quadrennial compliance obligations, which are equal to the sum of:

- The remainder of year 1 emissions, year 2 emissions, and year 3 emissions, and
- The entirety of year 4 emissions.

Shortfall

If an entity fails to surrender the required instruments by the compliance deadline, a shortfall is created. Shortfall Obligations are equal to the compliance obligation minus the amount of instruments that were actually retired. This obligation is generated concurrently to the Untimely Surrender Obligation.

Untimely Surrender

If an entity fails to surrender the required instruments by the compliance deadline, an untimely surrender is created. Untimely Surrender Obligations are equal to three times the Shortfall Obligation. This obligation is generated concurrently to the Shortfall Obligation.

Under-Reported Emissions

This search criteria results in the Under-Reported Emissions (URE) obligations. URE obligations are equal to the difference between the original emissions data for a budget year and the updated emissions data for the same budget year.

Under-Reported Emissions (Shortfalls and Untimely Surrenders)

When entities fail to surrender the Under-Reported Emissions obligation, shortfall and untimely surrender obligations are created.

- The URE Shortfall is equal to the URE obligation minus the amount of instruments that were actually retired.
- The URE Untimely Surrender is equal to three times the shortfall.

Offset Invalidation

When offsets issued by the Department of Ecology for a past compliance period are invalidated¹, the entity which used those instruments for compliance must replace the instruments to maintain environmental integrity.

Offset Invalidation (Shortfalls and Untimely Surrenders)

When entities fail to surrender the Offset Invalidation obligation, shortfall and untimely surrender obligations are created.

- The Offset Invalidation Shortfall is equal to the Offset Invalidation obligation minus the amount of instruments that were actually retired.
- The Offset Invalidation Untimely Surrender is equal to three times the shortfall.

CITSS Entity ID

The CITSS Entity ID field is an optional search criterion. This can refine search results to a single entity for account representatives on multiple entity accounts. Enter the entity ID and select "Submit" to generate the report for a single entity.

Upon submission of search criteria, CITSS generates a report. CITSS will display the message "Your Compliance Obligation Report is being prepared. Please return to this page to download it." (Error! Reference source not found.). This report may take several minutes to generate. You may refresh the page or leave and return to it. Once available, a hyperlink will appear at the bottom of the page (Error! Reference source not found.).

¹ WAC 173-446-580

Eligible Instruments for Retirement

The "Eligible Instruments for Retirement" page allows PARs, AARs, and AVAs to view instruments that are able to be surrendered to be meet specific obligations.

Allowances and offset credits are retired from compliance accounts **only**. Compliance instruments held in other accounts do not count toward meeting a compliance obligation.

While CITSS processes compliance for each obligation, CITSS determines the valid compliance instruments and retires each from the compliance account in a specific order based on the specific obligation.

**NOTE: CITSS will not retire more than the obligation from the compliance account, even if there are more instruments held in the compliance account than the obligation.

To view the "Eligible Instruments for Retirement", users must select a Jurisdiction, Budget Year(s), and Obligation Type (Figure 13). Users may optionally enter a CITSS Entity ID but are not required to.

| Figure 13 | 8: Eligible | Instruments | for Retirem | ent page |
|-----------|-------------|-------------|-------------|----------|
|-----------|-------------|-------------|-------------|----------|

| Log Out | Eligible Instruments for Retirement | |
|---------------------------------------|---|---------------------------------|
| Home Contact Us My User Profile | This page allows users to view a list of eligible instruments with the retirement order for an obligation period. Enter the Jurisdiction, Budget Yea Obligation Type, then select the "Submit" button to generate the list. If a California or Washington State jurisdiction entity that you represent has assigned a True-Up Quantity, entering the entity ID will show the remaining True-up Quantity that can be used to satisfy a compliance obligation selected Budget Year(s) and Obligation Type. | r(s) and s been n for the |
| Account Registration | Jurisdiction * Select V | |
| Representative Reports | Budget Year(s) * Select 🗸 | |
| Glossary | Obligation Type * Select V CITSS Entity ID | |
| | Submit Clear | |

Select "Submit" to generate the list for the specified Jurisdiction, Budget Year(s), and Obligation Type (Figure 14).

Figure 14: Eligible Instruments for Retirement page

| Log Out | Eligible Instruments for Retirement |
|---------------------------------------|---|
| Home Contact Us My User Profile | This page allows users to view a list of eligible instruments with the retirement order for an obligation period. Enter the Jurisdiction, Budget Year(s) and Obligation Type, then select the "Submit" button to generate the list. If a California or Washington State jurisdiction entity that you represent has been assigned a True-Up Quantity, entering the entity ID will show the remaining True-up Quantity that can be used to satisfy a compliance obligation for the selected Budget Year(s) and Obligation Type. |
| | Jurisdiction * Washington State V |
| Representative Reports | Budget Year(s) * 2023 V |
| Glossan | Obligation Type * Annual |
| Glossary | CITSS Entity ID |
| | Submit Clear The following information is provided as guidance. Users should consult the Regulation for specific retirement order requirements. The CITSS instrument retirement order for this obligation is: |
| | Offset credits providing Direct Environmental Benefits to the State and on Tribal Lands. a. Oldest retired first. b. Limited to 3% of the emissions with a compliance obligation. Offset credits providing Direct Environmental Benefits to the State and not on Tribal Lands. a. Oldest retired first. b. Limited to 5% of the emissions with a compliance obligation. Price Containment Reserve Allowances. Allowances of vintage equal to the obligation budget year or earlier. a. Oldest retired first. S. Allowances allocated for the purpose of True-up and transferred to the compliance account. a. Oldest retired first. |
| Notifications | |
| | |

The Notifications page allows users to view information on current or previous notifications, which can range from informational reminders to warnings for obligations.

CITSS sends an email to PARs and AARs when a notification has been created for an entity they represent. A "Reminders" pane appears at the top of the page when logging into CITSS (Figure 15).

| ot Us | Reminders | | | | | | |
|-------------------|---|---|--|--|---|---|--------------------------------|
| er Profile | Туре | Due Dat | e | Lin | k | | |
| Int Pagistration | Informational | | | Not | fications page | | |
| in Registration | 2023 Annual | 2024-09- | 10 18:00:00 EDT | Con | Compliance Obligations page | | |
| sentative Reports | | | | | | | 2 re |
| | | | | | | | |
| ar y | My Accoun | S | | | | | |
| ai y | My Accoun | S Operating Name | Account Type | Account | Jurisdiction | Account | Actio |
| ar y | My Accoun Name WA Company | Operating Name | Account Type | Account Number WA1000-5556 | Jurisdiction | Account Status Active | Actio |
| ан у | My Accoun Name WA Company A | S Operating Name WA Operating Company A | Account Type Electricity Allocation Holding | Account Number WA1000-5556 | Jurisdiction Washington State | Account Status Active | Actio |
| ан у | My Accoun Name WA Company A WA Company A | S Operating Name WA Operating Company A WA Operating Company A | Account Type Electricity Allocation Holding (g) Annual Allocation Holding | Account Number WA1000-5556 WA1000-996 | Jurisdiction Washington State Washington State | Account Status Active Active | Action View |
| ar y | My Accoun Name WA Company A WA Company A WA Company A | S Operating Name WA Operating Company A WA Operating Company A WA Operating Company A | Account Type Electricity Allocation Holding (g) Annual Allocation Holding Limited Use Holding | Account Number WA1000-5556 WA1000-996 WA1000-997 | Jurisdiction Washington State Washington State Washington State | Account Status Active Active Active | Action |
| ar y | My Accoun Name WA Company A WA Company A WA Company A WA Company A | S Operating Name WA Operating Company A | Account Type Electricity Allocation Holding (g) Annual Allocation Holding Limited Use Holding Compliance | Account Number WA1000-5556 WA1000-996 WA1000-997 WA1000-998 | Jurisdiction Washington State Washington State Washington State | Active Active Active Active Active | Action View View View |

Figure 15: CITSS Home page with notifications displayed under "Reminders"

Notifications can be accessed by the homepage (if displayed) or though the Compliance Reports.

PARs, AARs, and AVAs can search current and past notifications by Notification Name, Notification Type, CITSS entity ID, and entity legal name (Figure 16).

The search table yield the following fields:

- Notification Name: Name given to the notification by the Department of Ecology.
- Notification Type: Type of notification.
- Due Date: Deadline for the specific notification. If blank, there is no due date associated with the notification.
- CITSS Entity ID: The Entity ID for the entity the notification corresponds to.
- Entity Legal Name: The legal name of the entity as is entered in CITSS.
- Entity Operating Name: The operating name of the entity as is entered in CITSS.
- Quantity: The amount of instruments associated with the notification that must be in the compliance account by the Due Date. If blank, there is no quantity associated with the notification.
- Updated Date/Time: The last date and time the notification was modified.

Figure 16: Notifications page

| Log Out | Notifications | | | | | | |
|---------------------------------------|---|---|----------------------------------|--|---|--|--|
| Home Contact Us My User Profile | A notification is used to provide a depending on the purpose of the | n informational reminde notification. | r or to notify | an entity of a uniqu | e obligation. The inform | nation included i | n a notification varies |
| Account Registration | This page allows users to view in Name column identifies the notifi additional information about the s | formation regarding cur cation. Selecting the hypelected notification. | rent or past r perlink in the | notifications by select CITSS Entity ID col | cting the appropriate ta lumn switches to the Ne | b at the top of th otification Detail | e page. The Notification page which presents |
| Representative Reports | The search function allows searching by Notification Name, Notification Type, CITSS Entity ID, and Entity Legal Name. The search results are presented in tabular form in the bottom half of the screen and may be more than one page in length. The table is sortable (ascending or descending) by clicking on the column titles. Additional pages are accessed using the page numbers below the table on the left. This table can be exported in its entirety to CSV or Excel format by selecting the appropriate link below the table on the right. Selecting the "Clear" button clears the search fields. | | | | | | rch results are presented in ending) by clicking on the |
| Glossary | | | | | | | |
| | Current Past | | | | | | |
| | Notification Name | | | | | | |
| | Notification Type | Triennial S Triennial L Offset Inva | hortfall - Not Intimely Surr | Surrendered ender - Not Surrend | lered | | |
| | CITSS Entity ID | | | | | | |
| | Entity Legal Name | | | | | | |
| | Search Clear | | | | | | |
| | Notification Name | Notification Type | Due Date | CITSS Entity ID | Entity Legal Name | Quantity | Updated Date/Time |
| | Upcoming Compliance Deadline | Informational | | <u>WA1000</u> | WA Company A | | 2024-09-10 18:20:55 EDT |
| | | | | | | <u>C</u> | SV Excel 1 record |
| | | | | | | | |

To access the Notification Detail (Figure 17) page, select the hyperlinked CITSS Entity ID.

Figure 17: Notification Detail page

| Log Out | Notification Detail | |
|---------------------------------------|---|--|
| Home Contact Us My User Profile | The details of the selected notification are Quantity fields will contain the surrender r notification is "open" then compliance with | presented below. If this notification imposes an obligation for the surrender of instruments, the Due Date and equirements. Detailed information about this notification is presented in the Description field. If the Status of this in the action is required by the Due Date. |
| Account Registration | Notification Information | |
| Representative Reports | Notification Name | Upcoming Compliance Deadline |
| Glossary | Notification Type | Informational |
| | Due Date | |
| | CITSS Entity ID | WA1000 |
| | Entity Legal Name | WA Company A |
| | Entity Operating Name | WA Operating Company A |
| | Quantity | |
| | Description | The Compliance Obligation for 2023 emissions is November 1, 2024 at 5pm Pacific Time. |
| | Notification Status | Open |
| | Updated Date/Time | 2024-09-10 18:20:55 EDT |
| | | |

Back

Appendices

Appendix A - Access to CITSS

Registered users can access CITSS at <u>https://www.wci-citss.org</u>. 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, and Chrome)
- Storing CITSS usernames 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.

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