## Electronic Greenhouse Gas Data Collection and Management: Some Key Insights

#### U.S. GHG Reporting Program



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#### Presentation Outline



- U.S. GHG Data System Overview
- Key Business Challenges for the Data System
- Insights for System Design and Development
  - Architecture
  - Data collection
  - High quality data = high quality submissions
  - Coordination of software and regulation development
  - Electronic signature
  - Managing entity relationships



## Overview of EPA Electronic Greenhouse Gas Data System

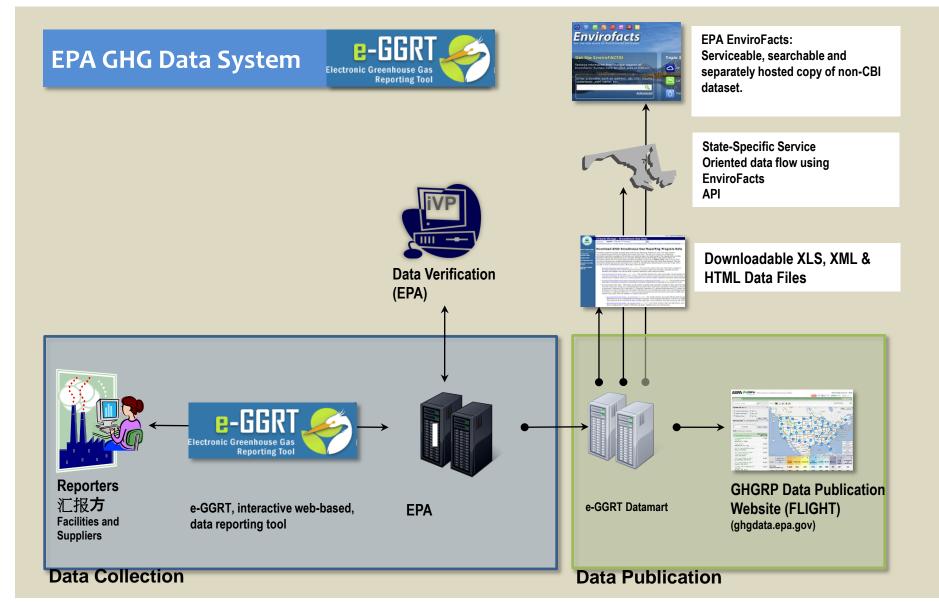
#### **GHG Data System Overview**



- Greenhouse Gas Data System Supports
  - Collection, verification and publication of GHG Data collected under the Mandatory Reporting of Greenhouse Gases Rule (40 CFR Part 98)
- Key Components
  - Electronic Greenhouse Gas Reporting Tool (e-GGRT)
  - Integrated Verification Process (iVP)
  - Publication Portal (FLIGHT)
  - Business Intelligence (Spago)
- Related
  - EPA EnviroFacts
  - EPA Central Data Exchange (CDX), Facility Registry Service (FRS)

#### **Electronic Reporting Data Flow**







## **Key Development Challenges**

## The System Development Business Challenge



- **2007, December:** FY2008 Appropriations Act
- 2009, April: GHG Reporting Rule Proposed
- 2009, October: GHG Reporting Rule Finalized
  - Electronic reporting only (1<sup>st</sup> for EPA)
  - Collect GHG data across most sectors of economy
  - Over two dozen unique industry source categories
  - Multiple GHG measurement methodologies
  - Multiple tiers
  - Dozens of fuels and fuel types
  - Sensitive or confidential data
  - Thousands of expected reporters
  - Thousands of users, all new entrants with steep learning curve
  - Has to support EPA verification of the data
- 2010, October & December: Technical corrections and clarifications
- 2010, December: Proposal to defer collection of inputs to equations
- 2011, March: (initial) First reporting deadline
- 2011, September: (final) First reporting deadline

## Data Collected under US GHG Reporting Program



#### Facility or supplier information includes:

- Name, address, latitude/longitude (in some cases)
- North American Industrial Classification Codes (NAICS)
- Parent company information

#### GHG emissions include:

- CO2 equivalent emissions (metric tons)
  - across all applicable sources
  - by each applicable subpart (source category) at the facility
  - excluding biogenic emissions
  - biogenic emissions
- CO2 equivalent quantity from supplier categories (metric tons)
- CH4, N20 emissions for the facility by subpart
- Emissions of each fluorinated GHG (F-Gas)

#### Data Collected, cont'd



#### Special Data Includes:

- Explanation of calculation methodology changes during the reporting year
- Description of Best Available Monitoring Methods (BAMM) used during the reporting year
- Requests for extension of the use of Best Available Monitoring Methods
- Supporting documentation (document upload) for BAMM extension requests
- Identification of each data element for which a missing data procedure was used
- Total number of hours in the year that a missing data procedure was used for each element
- Geologic sequestration monitoring, reporting and verification plan (document upload under Subpart RR)

## Data Collected (3)



- Source Specific Data Includes\*: (Example from Subpart Q, Iron and Steel)
  - Unit identification
  - Unit type (e.g. taconite indurating furnace, Electric Arc Furnace etc...)
  - Annual CO2 emissions for each unit
  - Annual quantity taconite pellets, coke, sinter, iron and raw steel for each unit
  - Method used (i.e. carbon mass balance or site-specific emission factor) for each unit
  - Annual mass of each process inputs and outputs to determine CO2 emissions
  - Annual volume of each type of gaseous and liquid fuel

<sup>\*</sup>in some cases collection of specific data elements may have been deferred



# Special Challenge: Confidential Business Information (CBI)

## Approach to Confidentiality Determinations (1)



- Case-by-case confidentiality determinations not practical, given the number or reporters (~8,000) and data elements (~2,000)
  - Would not result in timely release of data
  - Burden on reporters and the agency
- From 2010-2012, the EPA proposed confidentiality determinations for the data elements required to be reported using a notice and comment process.
- The confidentiality of each reported data element was determined using a twostep approach:
  - 1. Grouping data elements into 11 data categories (e.g., inputs to emission equations, emissions, and unit/process operating characteristics that are not inputs to emission equations for direct emitter source categories) and
  - 2. Making confidentiality determinations either categorically or on the basis of individual data elements.
- The EPA has now largely finalized confidentiality determinations for data elements except those in the "inputs to emission equations" category. (EPA proposed a rule addressing inputs in September 2013)

## Examples



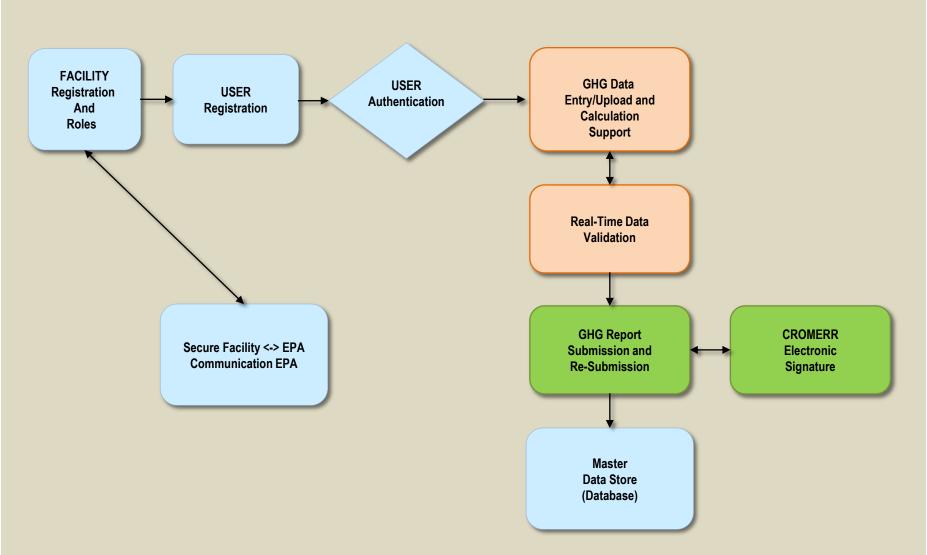
Source Category	Description of Data	Status (confidentiality determination as of 12/2013)
Q: Iron and Steel	Unit Identification Number	Emission Data
	Unit type	Emission Data
	Annual CO2 emissions for each unit	Emission Data
	Annual quantity taconite pellets, coke, sinter, iron and raw steel for each unit	СВІ
	Method used	Emission Data
	Carbon content of each process input used to determine CO2 emissions	Input to Emission Equation Deferred Until 2015
C: Combustion	Unit ID number	Emission Data
	Maximum rated heat input capacity	Emission Data
	Types of fuel combusted during the report year	Emission Data
	Methodology (i.e. Tier) used to calculate emissions	Emission Data
	Annual CO2 mass emissions for each type of fuel combusted during the reporting year	Emission Data



## **Design and Development Insights**

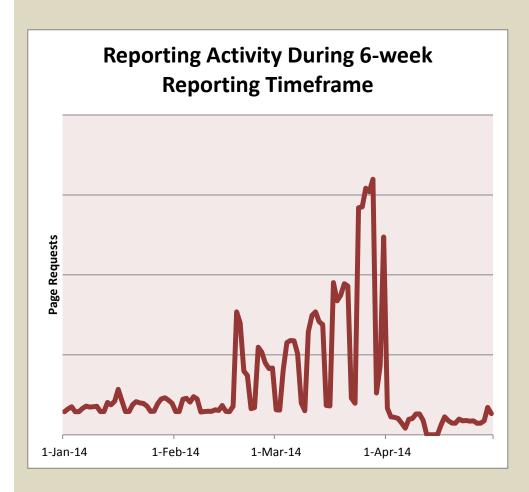
### Include Key Electronic Reporting Functions





#### Manage Load through Architecture



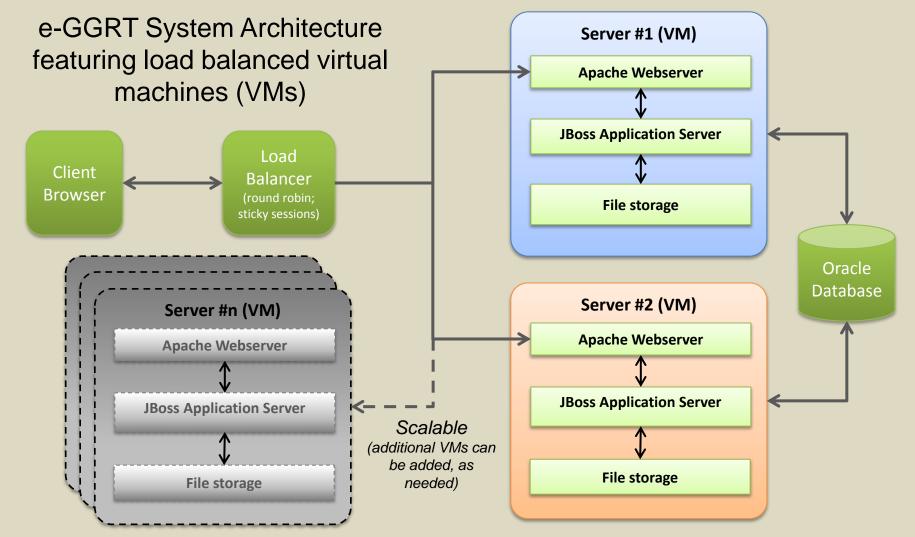


- Scalability
- Annual reporting deadline results in spikes in usage
- Architecture permits addition/removal of servers without disruption



#### Scalable Architecture





### Support Different Electronic Data Formats



Web-Form Data

**Document Upload** 

XLS Spreadsheet-Form Upload

XML Upload





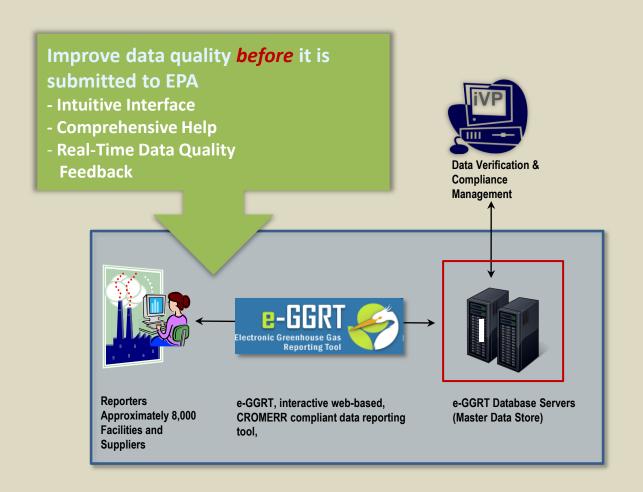


Data Format	Used For
Numerical data, via web- form	Emissions and activity data, entered directly into e-GGRT web-form fields
Free text, via web-form	Explanations of exceptions and special circumstances, entered directly into e-GGRT web-form
Documents (PDF, XLS, Doc, ZIP etc)	MRV plans under subpart RR, Supporting information under subpart W BAMMs
Numerical/text via XLS smart form	Used in certain subpart modules to ingest facility's GHG data, compatible with verification module
Numerical/text via XML file	Used in lieu of web-forms to upload GHG annual report into e-GGRT

## High Quality Data begins with High Quality Submissions



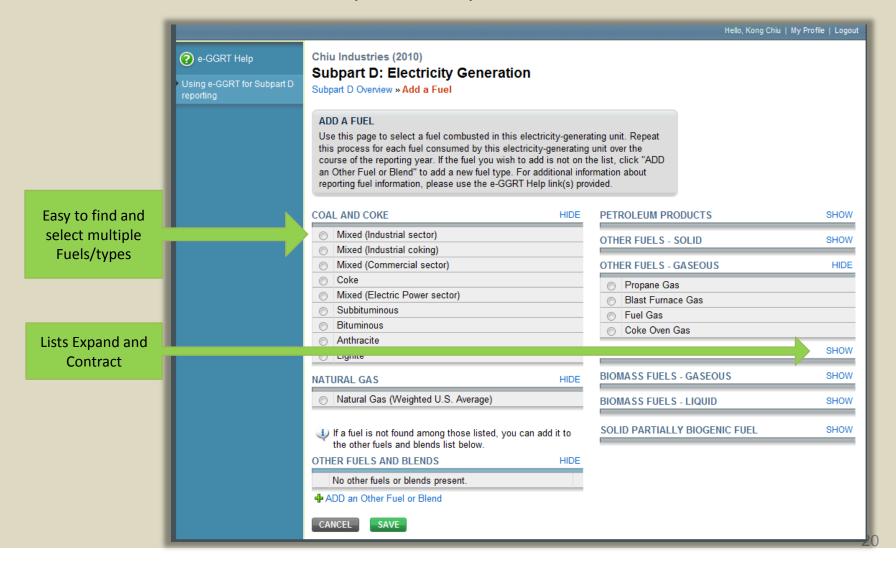
## Design software and system to improve data quality <u>before</u> user submits it to EPA



## High Quality Submissions (cont'd)



Intuitive User Interface (Table C-1)



## High Quality Submissions (cont'd)



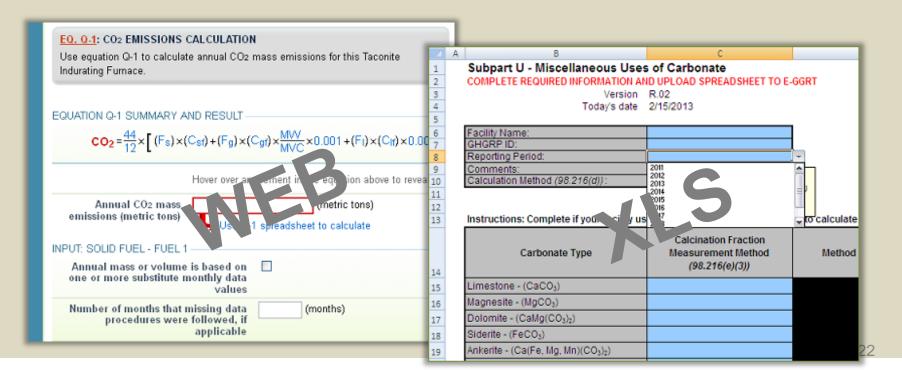
Real-Time Data Quality Feedback



#### Hybridize Data Entry

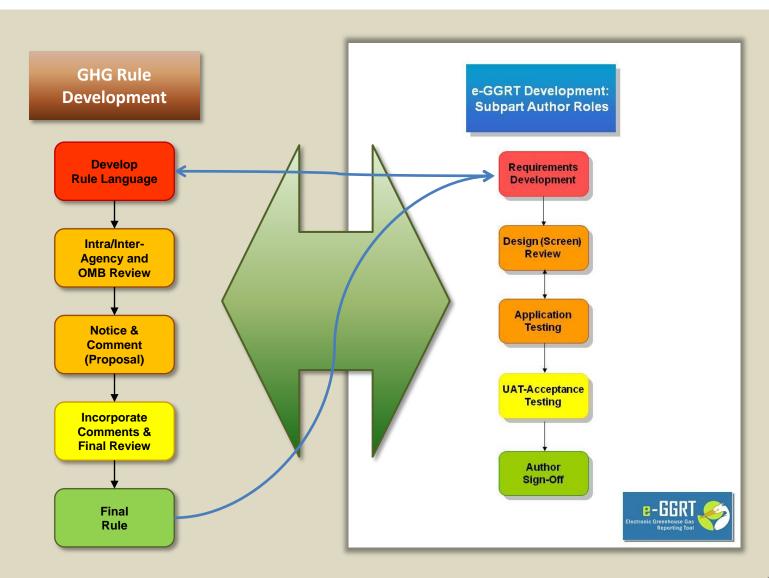


- Challenge: Short timeline, changing business requirements
- Web form data entry
  - User friendly
  - Significant development and testing effort
  - Direct parsing of entered data
- Spreadsheet Reporting form (Microsoft XLS)
  - Faster development and testing
  - Harder to parse data



## Coordinate Regulation and Data System Development



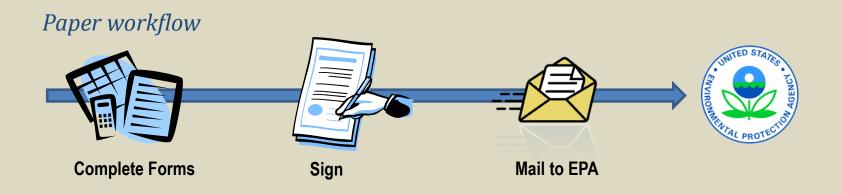


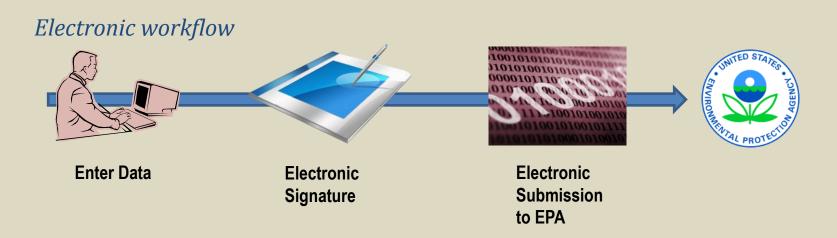


## **Electronic Signatures**

## Paper vs Electronic Reporting







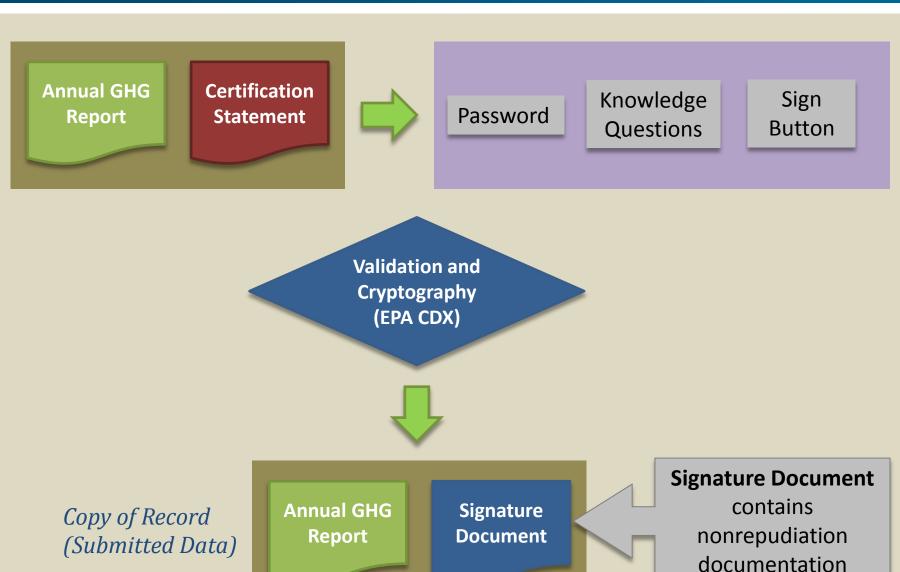
#### CROMERR, US Code, Title 40, Part 3



- Cross Media Electronic Reporting Rule (CROMERR)
- Electronic documents must have valid electronic signature if paper version requires signature
- The electronic document receiving system must be able to prove, legally that:
  - The electronic document was not altered without detection during transmission or after receipt
  - The electronic document was submitted knowingly
  - Any identified submitter or signatory had the opportunity to review the copy of record in a human-readable format
  - Each electronic signature was valid at the time of signing
  - Each signatory has signed an electronic signature agreement
  - The Identity of every individual using an electronic signature device has been determined with legal certainty

#### e-GGRT CROMERR Workflow



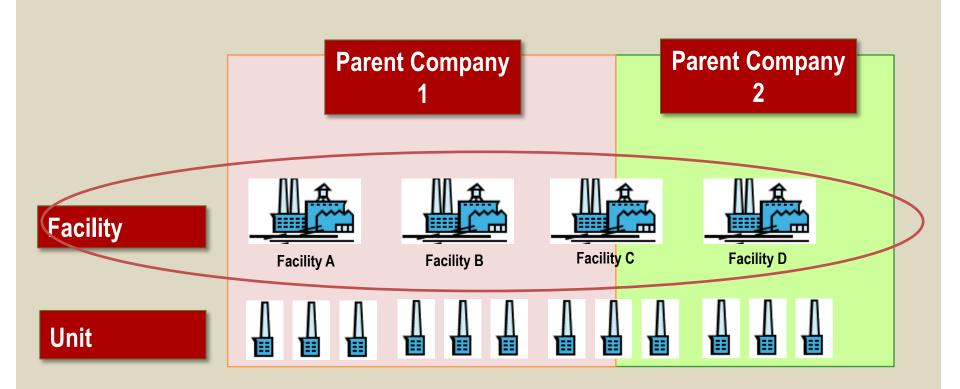




## **Managing Facilities and Users Electronically**

#### Reporting Level: Direct Emissions



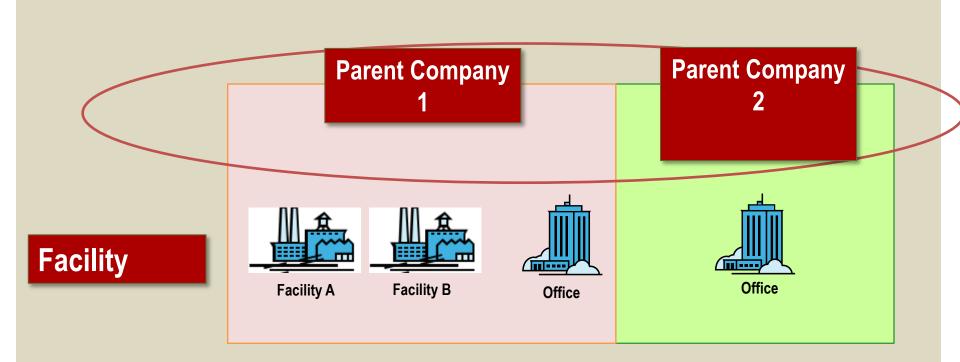


 Examples: Iron and Steel, Power Generation, Cement Production

#### Reporting Level: Suppliers



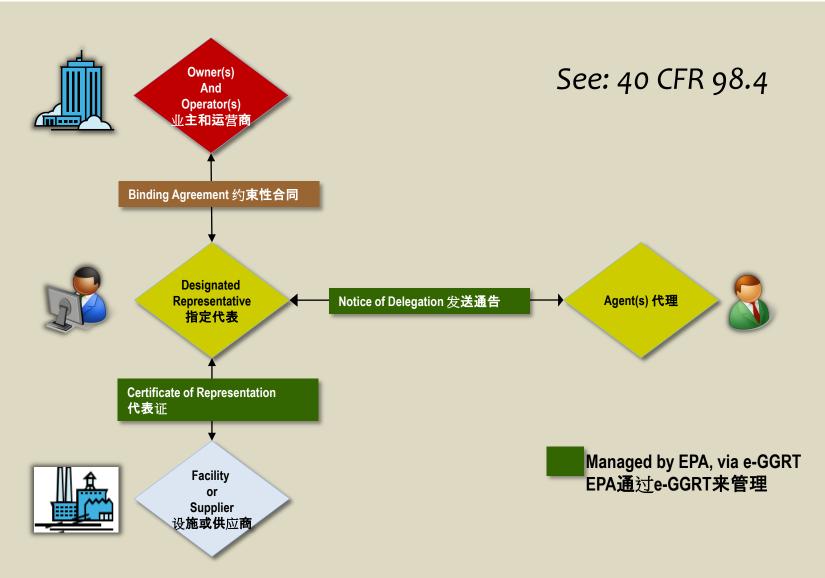




 Examples: Suppliers of Petroleum Products, Suppliers of Industrial GHGs, Natural Gas Supply

## Designated Representative for Facility or Supplier





#### Thank You! For More Information:



- Part 98 (U.S. GHG Reporting Rule) Info:
  - www.epa.gov/ghgreporting
- Published Data:
  - ghgdata.epa.gov

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