

Table 1. Summary Comparison of Mandatory GHG Reporting Rule and Regional Programs

| Issue | EPA Mandatory GHG Reporting Proposal | The Climate Registry (TCR) | CARB Rule AB-32 | Regional GHG Initiative (RGGI) | Western Climate Initiative (WCI) |
|-------------------------------------|---|--|---|--|---|
| Status | Proposal in early 2009 | Pilot reporting program implemented in 2008 | Adopted by CARB December 2008 | Took effect 1/1/09 | Draft proposal publicly released 1/6/09 |
| Purpose | Mandatory reporting program | Voluntary reporting program | Mandatory reporting program | Mandatory GHG reduction program | Mandatory GHG reduction program |
| Gases covered | All GHGs* | Six GHGs*, others optional | Six GHGs* | CO ₂ | All GHGs* |
| Reporting Level | Facility, broken down by GHG and source/unit | Corporate reporting, incl. facilities, by GHG & process | Facility, broken down by GHG, process, and fuel | Facility, broken down by combustion unit | Facilities, broken down by GHG and source/unit |
| Scope/ Who Reports | Upstream suppliers; direct emitters in >30 source categories; stationary combustion sources | Any corporation/ organization can join TCR. (State rules may require corporations to report using TCR procedures) | Direct emitters in 5 source categories; stationary combustion sources | Electric generating units (EGUs) > 25 MW in member states. | Upstream suppliers; direct emitters in 14 source categories (18 more being assessed); stationary combustion |
| What is Reported | Supplier emissions; Direct emissions; Monitoring & activity data; | Direct emissions; Limited activity data; Indirect emissions from electricity/thermal purchase; other indirects are optional | Direct Emissions; Monitoring & activity data; Electricity and thermal energy purchases; Mobile sources optional | Emissions from EGUs; Emissions reductions from offset projects; Continuous monitoring system & activity data | Emissions; Monitoring & activity data |
| Methods | Direct measurement or source-specific calculation using specified methods. | Some direct measurement, but mostly emission factors and calculations using General Reporting Protocol guidance. 5% de minimis** | Direct measurement or source-specific calculations using specified methods. 3% de minimis** | Direct measurement (CEMS) or other specified methods. Uses data submitted to EPA acid rain program (ARP) | Direct measurement or source-specific calculations using specified methods. 3% de minimis** |
| Consistency of Data Reported | All like reporters must use the same method | Many sources can choose from several methods | Like methods, but combustion can choose from several methods | All like reporters must use the same method | All like reporters must use the same method, with some exceptions |
| Thresholds | 25,000 metric ton CO ₂ e or capacity based (by source category) | Not applicable | 25,000 metric ton CO ₂ e or capacity based (by source category) | 25 MW electricity generation | Facilities over 25,000 metric ton CO ₂ e subject to cap & trade; facilities over 10,000 report |
| Verification | EPA verification using activity data provided by the reporter | Third party verification | Third party verification | EPA verification under ARP using monitoring & activity data reported | Third party verification |
| Enforcement | CAA administrative, civil, and criminal penalties | Not applicable | CA code administrative, civil and criminal penalties | Participating states enforce administrative, civil & criminal penalties | WCI partner jurisdictions (e.g. states) to enforce |
| Frequency/ Timing | Annual report on March 31. | Annual report on June 30; verification by Dec 15 | Annual report by April 1 or June 1 (by sector); verification 6 months later. | Quarterly and annual | Annual report on April 1; verification later. |
| Data distribution | Reported data available to the public | Annual reports available to the public (can claim facility-level data is CBI) | Reported data available to the public (except CBI) | ARP data are available to the public | Reported data available to public (jurisdictions handle CBI claims) |

* "Six GHGs" are CO₂, CH₄, N₂O, HFCs, PFCs, SF₆. "All GHGs" include these six plus other fluorinated compounds.

** CARB and WCI facilities can use simplified methods of their choice for 3% of their emissions (up to 20,000 tons per year maximum). TCR can use simplified methods for 5%.