

Regional Greenhouse Gas Initiative
CO₂ Budget Trading Program



**Massachusetts
Department of Environmental Protection**

Massachusetts CO₂ Budget Trading Program

Offset Project Consistency Application

Reduction in Emissions of Sulfur Hexafluoride (SF₆)

Version 1.0

Issued by

Issued on

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1. Overview

To demonstrate that an offset project involving reduction in emissions of sulfur hexafluoride (SF₆) qualifies for the award of carbon dioxide (CO₂) offset allowances, a Project Sponsor must submit to the Massachusetts Department of Environmental Protection (MassDEP) in accordance with the instructions (see accompanying instructions packet), a fully completed *Massachusetts Offset Project Consistency Application – Reduction in Emissions of SF₆ Version 1.0 (Consistency Application)*, including the coversheet and all forms and related attachments. An incomplete *Consistency Application* will not be reviewed to determine consistency. Following these instructions will ensure that the *Consistency Application* contains all necessary information and is submitted properly.

Each Project Sponsor should review the Massachusetts CO₂ Budget Trading Program regulations, 310 CMR 7.70(10) for information regarding offset projects located in Massachusetts and the award of CO₂ offset allowances. All Massachusetts offset application materials and other documents are available at <http://www.rggi.org/offsets>.

Before the *Consistency Application* can be completed, the Project Sponsor must establish a general account and obtain an offset project ID code through the Regional Greenhouse Gas Initiative (RGGI) CO₂ Allowance Tracking System (COATS). The Project Sponsor identified in the *Consistency Application* must be the same as the Authorized Account Representative for the RGGI COATS general account identified in the Massachusetts *Consistency Application*. For information about establishing a RGGI COATS general account and offset project ID code, consult the RGGI COATS User's Guide, available at <http://www.rggi-coats.org>.

Key eligibility dates and application submittal requirements for offset projects are as follows:

- For offset projects commenced between December 20, 2005, and December 31, 2008, the *Consistency Application* must be submitted by June 30, 2009.
- For offset projects commenced on or after January 1, 2009, the *Consistency Application* must be submitted within six (6) months after the project is commenced.
- For an offset project located in one (1) participating state, the *Consistency Application* must be filed with the appropriate regulatory agency in that state.
- For an offset project located in more than one (1) participating state, the *Consistency Application* must be filed in the participating state where the majority of the CO₂-equivalent (CO₂e) emissions reduction or carbon sequestration due to the offset project is expected to occur.

2. Submission Instructions

The Project Sponsor should submit the completed *Consistency Application*, and all attachments via RGGI COATS at <http://www.rggi-coats.org> as described above. For information about submitting a *Consistency Application* via RGGI COATS, consult the RGGI COATS User's Guide, available at <http://www.rggi-coats.org>.

The *Consistency Application* has three (3) parts, as described below. Each part comprises specified forms and required documentation. The *Consistency Application* has been created as a Microsoft Word document with editable fields. Enter information directly into the fields provided or submit information or documentation as an attachment, as directed. Include headers on all attachments indicating the form to which each is attached, the offset project name, and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents.

When submitting documents electronically via RGGI COATS, it is not necessary to submit a scanned or paper hardcopy of the application forms. The Project Sponsor must retain the completed original copy of the *Consistency Application* and attachments with the original signed documents. MassDEP reserves the right to request the original signed application documents at any time.

A completed hardcopy and/or CD of the *Consistency Application* may also be mailed to: Climate Strategies Group, Massachusetts Department of Environmental Protection, Bureau of Waste Prevention, 6th Floor, One Winter Street, Boston, MA 02108-4747.

Questions about this form and how to submit it should be directed to climate.strategies@state.ma.us or 617-574-6815.

3. Consistency Application Forms

The *Consistency Application* includes ten (10) forms divided into three (3) parts, as follows:

Part 1. General Information Forms

- Form 1.1 – Coversheet
- Form 1.2 – General Information
- Form 1.3 – Attestations
- Form 1.4 – Project Sponsor Agreement
- Form 1.5 – Disclosure of Greenhouse Gas Emissions Data Reporting

Part 2. Category-Specific Information and Documentation Forms

- Form 2.1 – Project Description
- Form 2.2 – Demonstration of Eligibility
- Form 2.3 – Emissions Baseline
- Form 2.4 – Monitoring and Verification Plan

Part 3. Independent Verification Form

- Form 3.1 – Independent Verifier Certification Statement and Report

Note that although the forms include many embedded instructions, Project Sponsors are advised to consult the accompanying instructions packet for full instructions and documentation requirements.

Offset Project Name

Offset Project ID Code

Form 1.1 – Coversheet

Project Sponsor (RGGI COATS Authorized Account Representative)

Project Sponsor Organization

RGGI COATS General Account Name

RGGI COATS General Account Number

Each of the following forms must be submitted. Check the boxes below to indicate that the submitted *Consistency Application* includes each of the required forms:

- Form 1.2 – General Information
- Form 1.3 – Attestations
- Form 1.4 – Project Sponsor Agreement
- Form 1.5 – Disclosure of Greenhouse Gas Emissions Data Reporting
- Form 2.1 – Project Description
- Form 2.2 – Demonstration of Eligibility
- Form 2.3 – Emissions Baseline
- Form 2.4 – Monitoring and Verification Plan
- Form 3.1 – Independent Verifier Certification Statement and Report

Offset Project Name **Offset Project ID Code**

Form 1.2 – General Information

Project Sponsor (RGGI COATS Authorized Account Representative)

Telephone Number **Fax Number** **Email Address**

Street Address

City **State/Province** **Postal Code** **Country**

RGGI COATS General Account Name

RGGI COATS General Account Number

Name of Offset Project **Application Date**

Summary Description of Offset Project

Project City **Project County** **Project State** **Project Commencement Date**

Project Sponsor Organization

Primary Street Address

City **State/Province** **Postal Code** **Country**

Brief Description of Project Sponsor Organization

Telephone Number **Website URL**

Independent Verifier (Company/Organization) **States Where Verifier Accredited**

Primary Street Address **Website URL**

City **State/Province** **Postal Code** **Country**

Point of Contact for Project

Contact Telephone Number **Contact Fax Number** **Contact Email Address**

Contact Street Address

City **State/Province** **Postal Code** **Country**

Offset Project Name

Offset Project ID Code

Form 1.3 – Attestations

The undersigned Project Sponsor certifies the truth of the following statements:

1. The offset project referenced in this *Consistency Application* is not required pursuant to any local, state, or federal law, regulation, or administrative or judicial order.
2. The offset project referenced in this *Consistency Application* has not and will not be awarded credits or allowances under any other greenhouse gas program except as provided in 310 CMR 7.70(10)(c)4.e. where CO₂ offset allowances may be awarded to an offset project for which GHG Credits were created pursuant to 310 CMR 7.00: Appendix B(7) provided the offset project meets all of the requirements of 310 CMR 7.70(10)..
3. The offset project referenced in this *Consistency Application* has not and will not receive any funding or other incentives from any system benefit fund, or funds or other incentives provided through the auction of CO₂ allowances from the Massachusetts Auction Account.
4. A *Consistency Application* for the offset project or any portion of the offset project referenced in this *Consistency Application* has not been filed in any other participating state.
5. All offset projects for which the Project Sponsor or project sponsor organization has received CO₂ offset allowances, if any, under the Project Sponsor's or project sponsor organization's ownership or control (or under the ownership or control of any entity which controls, is controlled by, or has common control with the Project Sponsor or project sponsor organization) are in compliance with all applicable requirements of the CO₂ Budget Trading Program in all participating states.
6. I am authorized to make this submission on behalf of the project sponsor organization. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this *Consistency Application* and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. 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.

Project Sponsor Signature

Date

Printed Name

Title

Organization

Offset Project Name

Offset Project ID Code

Form 1.4 – Project Sponsor Agreement

The undersigned Project Sponsor recognizes and accepts that the application for, and the receipt of, CO₂ offset allowances under the Massachusetts CO₂ Budget Trading Program is predicated on the Project Sponsor following all the requirements of 310 CMR 7.70(10). The undersigned Project Sponsor holds the legal rights to the offset project, or has been granted the right to act on behalf of a party that holds the legal rights to the offset project. The Project Sponsor understands that eligibility for the award of CO₂ offset allowances under 310 CMR 7.70(10) is contingent on meeting the requirements of 310 CMR 7.70(10). The Project Sponsor authorizes the MassDEP or its agent to audit this offset project for purposes of verifying that the offset project, including the Monitoring and Verification Plan, has been implemented as described in this application. The Project Sponsor understands that this right to audit shall include the right to enter the physical location of the offset project. The Project Sponsor submits to the legal jurisdiction of Massachusetts.

Project Sponsor Signature

Date

Printed Name

Title

Organization

Offset Project Name

Offset Project ID Code

Form 1.5 – Disclosure of Greenhouse Gas Emissions Data Reporting

Check the box below that applies:

- No greenhouse gas emissions data related to the offset project referenced in this *Consistency Application* have been or will be reported to a voluntary or mandatory program other than the Massachusetts CO₂ Budget Trading Program.
- Greenhouse gas emissions data related to the offset project referenced in this *Consistency Application* have been or will be reported to a voluntary or mandatory program other than the Massachusetts CO₂ Budget Trading Program. Information for all such programs to which greenhouse gas emissions data have been or will be reported is provided below.

Name of Program to which GHG Emissions Data Reported

Check all that apply:

- Reporting is currently ongoing
- Reporting was conducted in the past
- Reporting will be conducted in the future
- Reporting is mandatory
- Reporting is voluntary

Enter Frequency of Reporting

Enter Reporting Start Date

Program Contact Information – Address

Program Website

Categories Of Emissions Data Reported

Name of Program to which GHG Emissions Data Reported

Check all that apply:

- Reporting is currently ongoing
- Reporting was conducted in the past
- Reporting will be conducted in the future
- Reporting is mandatory
- Reporting is voluntary

Enter Frequency of Reporting

Enter Reporting Start Date

Program Contact Information – Address

Program Website

Categories of Emissions Data Reported

Add extra pages as needed. Each attachment must include a header that indicates it is an attachment to Form 1.5, identifies the number of the appropriate table and the reference number in the left-hand column of the table, and includes the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents.

Offset Project Name

Offset Project ID Code

Form 2.1 – Project Description

Attach a detailed narrative of the actions to be taken as part of the offset project. The attached narrative must include a header that indicates it is an attachment to Form 2.1 and includes the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents.

Check the boxes below to indicate that the detailed narrative includes the following required information:

- 1. Description of the transmission and/or distribution entity and the service territory served by the entity.
- 2. Identification and contact information for the owner and operator of the transmission and/or distribution entity.
- 3. Description of incremental actions to be taken as part of the offset project and a summary of eligibility.

Offset Project Name

Offset Project ID Code

Form 2.2 – Demonstration of Eligibility

Enter the SF₆ emissions rate for the transmission and/or distribution entity. Enter the applicable emissions rate performance standard at 310 CMR 7.70(10)(e)2.a.ii. Table 1 that applies to the transmission and/or distribution entity.

Baseline SF₆ Entity-wide Emissions Rate

Applicable Performance Standard Emissions Rate

If the entity-wide emissions rate is less than the applicable emissions rate performance standard, then Form 2.2 is complete.

If the entity-wide emissions rate is greater than the applicable emissions rate performance standard, check the applicable boxes below to indicate that documentation of the following is attached:

- A. The project is being implemented at a transmission and/or distribution entity serving a predominantly urban service territory; and

At least two (2) of the following factors prevent optimal management of SF₆:

- B. The entity is comprised of older than average installed transmission and distribution equipment in relation to the national average age of equipment.
- C. A majority of the entity's electricity load is served by equipment that is located underground, and poor accessibility of such underground equipment precludes management of SF₆ emissions through regular ongoing maintenance.
- D. Inability to take a substantial portion of equipment out of service, as such activity would impair system reliability.
- E. Required equipment purpose or design for a substantial portion of the entity's transmission and distribution equipment results in inherently leak-prone equipment.

Each attachment must include a header that indicates it is an attachment to Form 2.2 and identifies the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents.

Offset Project Name

Offset Project ID Code

Form 2.3 – Emissions Baseline

Provide the Entity-wide SF₆ Inventory Tracking System for the baseline year as an attachment. The attachment must include a header that indicates it is an attachment to Form 2.3 and includes the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents. Using data from the Entity-wide SF₆ Inventory Tracking System, enter the requested information below.

Baseline Year

Baseline Year Emissions Rate

Enter the following data for the baseline year (all SF₆ values in pounds (lbs)):

V_{iey} = SF₆ inventory in cylinders, gas carts, and other storage containers (not SF₆-containing operating equipment) at the end of the reporting year

= **Change in SF₆ Inventory in cylinders, gas carts, and other storage containers (not SF₆-containing operating equipment) (V_{iby} - V_{iey})**

PA_{psd} = SF₆ purchased from suppliers or distributors in cylinders

PA_e = SF₆ provided by equipment manufacturers with or inside SF₆-containing operating equipment

PA_{rre} = SF₆ returned to the reporting entity after off-site recycling

= **Total Purchases/Acquisitions (PA_{psd} + PA_e + PA_{rre})**

SD_{op} = Sales of SF₆ to other parties, including gas left in SF₆-containing operating equipment that is sold

SD_{rs} = Returns of SF₆ to supplier (producer or distributor)

SD_{df} = SF₆ sent to destruction facilities

SD_{sor} = SF₆ sent off-site for recycling

= **Total Sales/Disbursements (SD_{op} + SD_{rs} + SD_{df} + SD_{sor})**

CNP_{ne} = Total SF₆ nameplate capacity of new SF₆-containing operating equipment at proper full charge

CNP_{rse} = Total SF₆ nameplate capacity of retired SF₆-containing operating equipment at proper full charge

= **Total Change in SF₆ Nameplate Capacity (CNP_{ne} - CNP_{rse})**

= **Total SF₆ Emissions (lbs) [(V_{iby} - V_{iey}) + (PA_{psd} + PA_e + PA_{rre}) - (SD_{op} + SD_{rs} + SD_{df} + SD_{sor}) - (CNP_{ne} - CNP_{rse})]**

= **Total SF₆ Emissions (Tons CO₂e) [(Total SF₆ Emissions (lbs) x GWP¹ of SF₆ (22,200))/2000]**

¹ GWP: global warming potential; SF₆ (22,200).

Offset Project Name

Offset Project ID Code

Form 2.4 – Monitoring and Verification Plan

Provide the Monitoring and Verification Plan (M&V Plan) as an attachment. The attached M&V Plan must include a header that indicates it is an attachment to Form 2.4 and includes the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents.

Check the boxes below to indicate that required information is attached:

An M&V Plan is attached.

The attached M&V Plan documents the following:

- 1. Data sources and calculations
- 2. SF₆ Inventory Management and Auditing Protocol, which documents the following components:
 - Description of the Entity-wide SF₆ Inventory Management Tracking System
 - Personnel contact information
 - Inventory tracking system procedures and training
 - Auditing procedures and plans
- 3. Quality Assurance and Quality Control (QA/QC) Protocol, which documents the following components:
 - Contact information and QA/QC schedule
 - QA/QC procedures and training

Offset Project Name

Offset Project ID Code

Form 3.1 – Independent Verifier Certification Statement and Report

An accredited verifier must sign and date Form 3.1. Attach the accredited verifier report. The attached verifier report must include a header that indicates it is an attachment to Form 3.1 and includes the offset project name and offset project ID code. If attachments are being submitted as separate electronic documents, please include the form numbers in the file names of the documents. Note that the Project Sponsor must retain the completed original copy of the *Consistency Application* and attachments, including the verifier's original signed documents. MassDEP reserves the right to request the original signed documents at any time.

Name of Accredited Independent Verifier

I certify that the accredited independent verifier identified above reviewed the *Consistency Application*, including all forms and attachments, in its entirety, including a review of the following:

- (a) The adequacy and validity of information supplied by the Project Sponsor to demonstrate that the offset project meets the applicable eligibility requirements of 310 CMR 7.70(10)(c) and (e)2, including the required documentation that must be provided in the *Consistency Application*.
- (b) The adequacy and validity of information supplied by the Project Sponsor to demonstrate baseline emissions, pursuant to the applicable requirements of 310 CMR 7.70(10)(e)2., including the required documentation that must be provided in the *Consistency Application*.
- (c) The adequacy of the Monitoring and Verification Plan in accordance with the applicable requirements of 310 CMR 7.70(10)(e)2. including the required documentation that must be provided in the *Consistency Application*.

A verification report is attached that documents the verifier's review of the items listed above and includes evaluation conclusions and findings.

<input type="text"/> Verifier Representative Signature	<input type="text"/> Date
<input type="text"/> Printed Name	
<input type="text"/> Title	
<input type="text"/> Organization	