

## PREPARING FOR THE 2018-2020 FULL COMPLIANCE PERIOD COMPLIANCE OBLIGATION

The third California Cap-and-Trade Program Compliance Period (CP3) began on January 1, 2018 and ended on December 31, 2020. This Compliance Period includes two annual compliance obligation deadlines, November 1, 2019 (for 2018 emissions) and November 2, 2020 (for 2019 emissions), and one Full Compliance Period Compliance Obligation deadline on November 1, 2021 (Full Compliance Obligation). The Full Compliance Obligation is displayed in the Compliance Instrument Tracking System Service (CITSS) as the *2018-2020 Triennial Compliance Obligation*.

- The California Full Compliance Obligation is due by no later than:  
**November 1, 2021, 5:00 PM Pacific Time.**

This document outlines the key actions that the Primary Account Representative (PAR) and/or an Alternate Account Representative (AAR) should undertake to ensure entities have sufficient compliance instruments (eligible allowances and offset credits) in the compliance account to fulfill the 2018-2020 Full Compliance Obligation. This document provides the following guidance:

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CARB staff are available by phone and email to assist with any compliance-related questions.

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## 1.1 SUMMARY OF THE 2018-2020 FULL COMPLIANCE OBLIGATION

### 1.1.1 Key Points

- The California Full Compliance Obligation is due by no later than: **November 1, 2021, 5:00 PM Pacific Time.**
- The Full Compliance Obligation is the sum of verified covered emissions in 2018, 2019, and 2020 minus instruments retired during the annual compliance obligations in 2018 and 2019. CITSS account representatives must transfer eligible instruments to an entity's compliance account (surrender instruments) before the California Full Compliance Obligation deadline on **November 1, 2021 at 5:00 PM Pacific Time.**
- Eligible Instruments for the 2018-2020 Full Compliance Obligation:
  - Allowances with vintage 2020 or earlier
  - Allowances with no vintage (always eligible)
  - Offset credits of any vintage (up to the 8 percent Quantitative Usage Limit)
    - Offset credits with the Direct Environmental Benefits in the State of California (DEBS) designation can be surrendered but are not required for this Full Compliance Obligation
  - Entities assigned a true-up quantity in CITSS can use vintage 2021 and/or 2022 allowances as specified by "Remaining True-up Quantity"
- Failure to fulfill a compliance obligation by the deadline results in an Untimely Surrender Obligation. The Untimely Surrender Obligation is any unfulfilled portion of an entity's Annual or Full Compliance Period Compliance Obligation and is calculated as four times the entity's outstanding emissions.

### 1.1.2 Discussion

The third California Cap-and-Trade Compliance Period (CP3) ended on December 31, 2020. The Compliance Period includes covered emissions verified for the calendar years 2018, 2019, and 2020. Entities were required to report verified 2020 emissions to CARB no later than August 10, 2021. Account representatives must transfer a sufficient number of eligible compliance instruments into an entity's compliance account in CITSS by the November 1, 2021 compliance obligation deadline.

An entity may use offset credits to satisfy a portion of the 2018-2020 Full Compliance Obligation. The maximum number of offset credits allowed is 8 percent of verified covered emissions. Offset credits of any vintage are eligible.

The CITSS Compliance Obligation Detail Report shows past and current compliance obligations. For current compliance obligations, CITSS shows a pending compliance status to assist account representatives in determining if sufficient eligible compliance instruments are in the compliance account to satisfy the compliance obligation.

The CITSS Compliance Obligation Detail Report does not show current compliance obligations until CARB uploads verified covered emissions and approves the

compliance obligation in CITSS. CARB expects the Full Compliance Obligation will be available in CITSS by early October 2021. Covered entities will receive an email from CITSS once the Full Compliance Obligation has been approved.

## 1.2 HOW TO REVIEW FACILITY INFORMATION

### 1.2.1 Key Points

Facility emissions are the basis for compliance obligations. CITSS sums facility emissions to determine the basis of an entity's compliance obligation.

- An account representative should confirm that:
  - The correct facilities are associated with the entity's CITSS account
  - Facilities have the correct GHG Emissions Reporting ID
  - Facilities have a correct status of active or retired
  - The CITSS GHG Emissions Reporting ID assigned to each facility is the same as the Cal-eGGRT ARB GHG Reporting ID for that facility

### 1.2.2 Discussion

Facility covered emissions are the basis of the compliance obligation calculation. An entity account can have multiple associated facilities and covered emission sources. CITSS identifies each facility or emission source associated to an entity account by a unique CITSS Facility ID and the GHG Emissions Reporting ID. The CITSS GHG Emissions Reporting ID is the same as the ARB GHG Reporting ID in the California electronic Greenhouse Gas Reporting Tool (Cal-eGGRT).

The following figure is a screenshot of the CITSS Facilities Tab. CITSS lists all facilities ever associated with an entity with its GHG Emissions Reporting ID and Facility Status. Facilities with Active status are currently associated with the entity and typically contribute to a compliance obligation. Account representatives should confirm that the correct facilities are associated with the entity, are active or retired as applicable, and the CITSS GHG Emissions Reporting ID is the same as the Cal-eGGRT ARB GHG Reporting ID.

**FIGURE: Screenshot of CITSS Facilities Tab**

Home > My Account > Facilities Tab

**Airship Assemblers**

This page shows information for your account or set of accounts. You may propose changes to the information listed under the General and Contact Information pages by selecting Edit Information at the bottom of the pages. You can remove or propose changes to Representatives, and Account Viewing Agents under their respective tabs. You can indicate your interest in participating in the next scheduled auction under the Auction Tab.

General Account   Compliance Account   (g) Annual Allocation Holding Account

General   Contact Information   Representatives   Account Viewing Agents   Holding Limits   Auction   **Facilities**

The Facilities tab shows the facilities managed by the entity identified at the top of the screen. The entity is responsible for managing compliance instruments and compliance obligations for these facilities. Information about each facility is available by selecting the link in the Facility Name column.

An account representative adds a new covered facility by selecting the "Add facility" button. **Warning!** A facility previously operated by another entity is already in CITSS. Adding the facility a second time creates a duplicate. If the facility is already in CITSS, the Registrar will re-assign the existing facility to the new owner or operator.

Any facility changes must be accompanied with signed forms authorizing the changes. CITSS forms can be downloaded from the ARB CITSS website, <http://www.arb.ca.gov/citss>. For guidance on how to change facility information, additional CITSS support is available at: <https://wci-inc.org/citss-support>

Facility Name	Facility Operating Name	GHG Emissions Reporting ID	Status	Effective Date	Retirement Date	Actions
<a href="#">Airship Hanger Alpha</a>	Airship Hanger Alpha	000001	Active	2021-07-16		No Action
<a href="#">Airship Hanger Beta</a>	Airship Hanger Beta	000002	Active	2021-07-16		No Action

[CSV](#)   [Excel](#)   2 records

Add Facility

**1.3 HOW TO REVIEW FACILITY VERIFIED COVERED EMISSIONS**

**1.3.1 Key Points**

- CITSS calculates the Full Compliance Obligation based on verified facility covered emissions for the applicable years.
- CITSS shows verified covered emissions by facility by year.
- An account representative should confirm that:
  - Verified covered emissions are correct
  - Verified covered emissions are associated to the correct facility

**1.3.2 Discussion**

CITSS calculates compliance obligations based on verified facility covered emissions for the applicable years. Entities report verified covered emissions to CARB no later than August of the year following the calendar year in which the covered emissions occurred, e.g., entities reported and verified 2020 emissions to CARB in 2021.

The following figure shows a screenshot of a CITSS Emissions Report displaying all verified covered emissions by budget year and facility.

**Figure: Screenshot of a CITSS Emissions Report**

Home > Representative Reports > Compliance – Emissions Report

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## Emissions

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.

Budget Year 2013 ▲  
2014  
2015 ▼

CITSS Entity ID

Entity Legal Name

Facility Name

GHG Emissions Reporting ID

Results per page 10 ▼

Budget Year	CITSS Entity ID	Entity Legal Name	Facility Name	GHG Emissions Reporting ID	Emissions (metric tons CO <sub>2</sub> e)	Updated Date/Time
2020	CA3644	Airship Assemblers	Airship Hanger Alpha	000001	5,000	2021-07-20 15:32:04 EDT
2020	CA3644	Airship Assemblers	Airship Hanger Beta	000002	5,000	2021-07-20 15:32:04 EDT
2019	CA3644	Airship Assemblers	Airship Hanger Alpha	000001	5,000	2021-07-19 22:21:21 EDT
2019	CA3644	Airship Assemblers	Airship Hanger Beta	000002	5,000	2021-07-19 22:21:21 EDT
2018	CA3644	Airship Assemblers	Airship Hanger Alpha	000001	5,000	2021-07-19 18:10:36 EDT
2018	CA3644	Airship Assemblers	Airship Hanger Beta	000002	5,000	2021-07-19 18:10:36 EDT

[CSV](#)
[Excel](#)
6 records

## 1.4 HOW TO ESTIMATE THE 2018-2020 FULL COMPLIANCE OBLIGATION

### 1.4.1 Key Points

- The Full Compliance Obligation is the sum of emissions in 2018, 2019, and 2020 minus instruments retired during the annual compliance obligations in 2018 and 2019. Any deferred 2017 covered emissions are also due with the Full Compliance Obligation.
- Representatives are able to preview the compliance obligation for the 2018-2020 Full Compliance Obligation on the CITSS Compliance Obligation Detail Report by early October. Covered entities will receive an email from CITSS once the Full Compliance Obligation has been approved.

### 1.4.2 Discussion

Using preliminary reported emissions, entities can estimate their Full Compliance Obligation before CITSS shows the current compliance obligation.

Cal-eGGRT stores emission values in decimal format. CITSS stores emission values as whole numbers. CARB uses conventional rounding (less than 0.5 round down, 0.5 and greater round up) when uploading Cal-eGGRT emissions into CITSS.

CITSS calculates the annual compliance obligation as 30 percent of verified covered emissions. CARB rounds down the calculated annual compliance obligation to the nearest whole number.

The following example demonstrates calculation of the Full Compliance Obligation for an entity with 2018 verified covered emissions of 100,000 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>), 2019 verified covered emissions in Cal-eGGRT of 100,000.32 MTCO<sub>2e</sub>, and 2020 verified covered emissions of 100,000 MTCO<sub>2e</sub>.

**Table: Example Calculation of a Full Compliance Obligation for 2018-2020 Covered Emissions**

<i>Sum the verified covered emissions for the years 2018-2020.</i>	100% of 2018 Emissions	100,000
	100% of 2019 Emissions	100,000
	100% of 2020 Emissions	100,000
	<b>Total Emissions</b>	<b>300,000</b>
<i>Subtract instruments retired for 2018 and 2019 annual obligations.</i>	30% of 2018 Emissions	30,000
	30% of 2019 Emissions	30,000
	<b>Instruments Retired</b>	<b>60,000</b>
<b>Instruments needed to fulfill Full Compliance Obligation</b>		<b>240,000</b>

## 1.5 QUANTITATIVE USAGE LIMIT

### 1.5.1 Key Points

- An entity may use offset credits to satisfy a portion of the 2018-2020 Full Compliance Obligation.
- The Quantitative Usage Limit sets the maximum number of offset credits an entity can use.
- The Quantitative Usage Limit for the 2018-2020 Full Compliance Obligation is eight percent (8%) of 2018-2020 verified covered emissions.
- Offset credits with the special category designation Direct Environmental Benefits (DEBs) can be surrendered, but are not required for the 2018-2020 Full Compliance Obligation. (For reference, starting with 2021 verified covered emissions where the 2021 Annual Compliance Obligation is due by no later than November 1, 2022, the Quantitative Usage Limit will be reduced to four percent (4%) of 2021 verified covered emissions, and no more than half of this limit can be met with offset credits that are not designated as providing DEBS.)

### 1.5.2 Discussion

In CITSS, verified covered emissions are uploaded as a whole number. Multiplication of verified covered emissions as a whole number by 0.08 (8%) usually results in a decimal value. To avoid exceeding the Quantitative Usage Limit, CARB rounds the calculated maximum number of offset credits down to the nearest whole number.

The table below shows an example calculation of the maximum number of offset credits an entity with a Full Compliance Obligation of 300,000 MTCO<sub>2</sub>e may use to satisfy its 2018-2020 Full Compliance Obligation.

**Table: Example Calculation of Maximum Offset Credits for 2018-2020 Full Compliance Obligation**

<i>Calculate 8% of total emissions</i>	300,000 x .08	24,000
<i>Subtract offsets retired in annual obligations</i>	Number of offsets retired in 2018	-8,000
	Number of offsets retired in 2019	-1,000
Number of offsets that can be used for the Full Compliance Obligation		15,000

## 1.6 UNDERSTANDING ELIGIBLE COMPLIANCE INSTRUMENTS

### 1.6.1 Key Points

- An entity must use eligible instruments to fulfill a compliance obligation.
- Eligible Instruments for the 2018-2020 Full Compliance Obligation:
  - Allowances with vintage 2020 or earlier
  - Allowances with no vintage (always eligible)
  - Offset credits of any vintage (up to the 8 percent Quantitative Usage Limit)
    - Offset credits with the DEBS designation can be surrendered but are not required for this Full Compliance Obligation
  - Entities assigned a true-up quantity can use a limited number of vintage 2021 and/or 2022 allowances as specified by the “Assigned Vintage” associated with the entity’s Remaining True-up Quantity. The Compliance Obligation Detail Report section of this document provides further explanation of “Assigned Vintage”

### 1.6.2 Discussion

Eligible allowances for the 2018-2020 Full Compliance Obligation include allowances with a vintage 2020 or earlier. Offset credits of any vintage are eligible. The number of offset credits is subject to the quantitative usage limit of 8 percent of verified covered emissions. Price Containment Reserve Allowances (PCRAs) and other allowances without a vintage are always eligible. An entity with Remaining True-up Quantity may also use the specified number of vintage 2021 and/or 2022 allowances.

CITSS will only retire the number of instruments from the compliance account necessary to fulfill the compliance obligation. CITSS leaves any excess instruments in the compliance account.

The following figure shows the CITSS Eligible Instruments for Retirement screen, which lists eligible instruments and the order that instruments are retired during compliance. The eligible instruments retirement order for the 2018-2020 Full Compliance Obligation is:

- 1) Offset credits.
  - a) Oldest vintages retired first
  - b) Limited to 8% of total covered emissions with a compliance obligation
- 2) Price Containment Reserve Allowances
- 3) Other non-vintage Allowances
- 4) Allowances of vintage equal to the compliance obligation budget year or earlier
  - a) Oldest vintages retired first
- 5) Allowances allocated for the purpose of true-up and transferred to the compliance account
  - a) Oldest vintages retired first



## Figure: Screenshot of CITSS Eligible Instruments for Retirement Report

Home > Representative Reports > Compliance – Eligible Instruments for Retirement

**CITSS** Compliance Instrument Tracking System Service

English • Français • LOGGED IN AS: xjones

### Eligible Instruments for Retirement

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 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 \* California ▼  
 Budget Year(s) \* 2018-2020 ▼  
 Obligation Type \* Triennial ▼  
 CITSS Entity ID CA3644

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:

1. Offset credits.
  - a. Oldest retired first.
  - b. Limited to the quantitative usage limit of the emissions with a compliance obligation – refer to table below.
2. Price Containment Reserve Allowances.
3. Other non-vintage Allowances.
4. Allowances of vintage equal to the obligation budget year or earlier.
  - a. Oldest retired first.
5. Allowances allocated for the purpose of True-up and transferred to the compliance account.
  - a. Oldest retired first.
6. Price Ceiling Units.

## 1.7 UNDERSTANDING TRUE-UP

### 1.7.1 Key Points

- CARB allocates allowances to adjust for changes in required allocation of allowances resulting from verified covered emissions not reflected in prior allocations for a given year.
- “True-up Quantity” is a value, not a type of allowance.
- Remaining True-up Quantity is the number of allowances with a vintage later than the compliance obligation budget year that an entity can use to fulfill the current compliance obligation, i.e., an entity assigned a true-up quantity may use a specified quantity of 2021 and/or 2022 vintage allowances for the 2018-2020 Full Compliance Obligation.

### 1.7.2 Discussion

Understanding true-up requires understanding related terminology and timing of activities. The budget year is the year the emissions occurred. CARB allocates allowances with a vintage the same as the budget year prior to each budget year. Entities report verified covered emissions to CARB following each budget year. If verified covered emissions require a greater number of allocated allowances than prior allocations, CARB provides additional allowances of a later vintage to adjust for the recalculated allocation. CARB refers to this process as “true-up.”

When CARB receives verified covered emissions, allowances with the vintage equal to the budget year are no longer available to allocate. As a result, allowances allocated for true-up are of the vintage two years later than the budget year. Allowances allocated for true-up are included in the annual allocation each October. A summary of the 2020 budget year true-up cycle is as follows:

2019 Oct .....Entities receive 2020 allowances in the allocation for the upcoming budget year, 2020.

2020 Jan-Dec .....2020 budget year emissions occur.

2021 Aug .....2020 verified covered emissions are reported and True-up Quantity calculated.

2021 Oct .....CARB assigns 2020 True-up Quantity in CITSS by including additional 2022 vintage allowances equal to the amount of the Assigned True-up Quantity with the 2022 budget year allocation.

In the above example, the true-up process allows use of the specified number of vintage 2022 allowances to fulfill the 2018-2020 Full Compliance Obligation, or any later compliance obligation.

#### True-up Quantity Terminology

- “Assigned True-up Quantity” defines the eligible vintage and number of allowances allocated for true-up.
- “Remaining True-up Quantity” is the balance of unused True-up Quantity. “Remaining True-up Quantity” is the maximum number of allowances of the specified vintage that an entity can use as eligible allowances toward fulfillment of the current compliance obligation.
- “Remaining True-up Quantity” remains useable until the assigned vintage becomes current, and the true-up process is no longer required for the allowances to be eligible.

The following figure is a screenshot of the CITSS True-Up Quantity Report for the fictional entity, Airship Assemblers, for Budget Year 2020. The figure shows that CARB assigned a True-up Quantity of 1,000 to Airship Hanger Alpha for Budget Year 2020.

**Figure: Screenshot of CITSS True-Up Quantity Report**  
 Home > Representative Reports > Compliance – True-Up Quantity

**True-Up Quantity**

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.

Budget Year: 2013, 2014, 2015

CITSS Entity ID: CA3644

Entity Legal Name: [ ]

Facility Name: [ ]

GHG Emissions Reporting ID: [ ]

Results per page: 10

[Search](#) [Clear](#)

Budget Year	CITSS Entity ID	Entity Legal Name	Facility Name	GHG Emissions Reporting ID	Assigned True-Up Quantity	Updated Date/Time
2020	CA3644	Airship Assemblers	Airship Hanger Alpha	000001	1,000	2021-07-20 16:03:03 EDT
2019	CA3644	Airship Assemblers	Airship Hanger Alpha	000001	1,000	2021-07-19 22:30:15 EDT

[CSV](#) [Excel](#) 2 records

CITSS provides information about Assigned True-up Quantity and Remaining True-up Quantity by Assigned Vintage in the Compliance Obligations Details Report (described in more detail in the next section of this document). The following figures excerpted from that report show that CARB allocated 1,000 vintage 2022 allowances to adjust the allocation for Budget Year 2020. The "Remaining True Quantity" is 1,000 (same as the Assigned True-up Quantity) because the entity has not yet used any 2022 allowances for compliance.

An entity can sell allocated allowances once those allowances are available in the General Holding Account, but True-up Quantity remains with the entity. This means that the purchasing entity cannot use those allowances for compliance unless it has also been assigned a True-up Quantity. An entity that sells its allocated allowances may no longer have allowances of an Assigned Vintage. In such a situation, the entity can purchase other allowances of the Assigned Vintage and surrender those up to the "Remaining True-up Quantity."

**Figure: Screenshot of CITSS Assigned and Remaining True-up Quantity**

Home &gt; Representative Reports &gt; Compliance Obligations – Current Tab

Assigned True-up Quantity ?				
Budget Year	Facility Operating Name	GHG Emissions Reporting ID	Assigned Vintage	Assigned Quantity
2019	Airship Hanger Alpha	000001	2021	1,000
2020	Airship Hanger Alpha	000001	2022	1,000
				<a href="#">CSV</a> <a href="#">Excel</a> 2 records

  

Remaining True-up Quantity ?	
Eligible True-up Vintages	Remaining Quantity
2021	1,000
2022	1,000

**1.8 HOW TO REVIEW COMPLIANCE OBLIGATION DETAIL IN CITSS****1.8.1 Key Points**

- The Compliance Obligation Detail Report shows all relevant information for a selected compliance obligation.
- The Compliance Obligation Detail Report cannot show current compliance obligations until CARB uploads verified covered emissions, allowing calculation of the obligations, usually in late September or early October.
- CITSS evaluates instruments in the compliance account and calculates if there are enough eligible instruments to fulfill the compliance obligation. This is the Pending Compliance Status.

**1.8.2 Discussion**

The CITSS Compliance Obligations Detail Report presents detailed information about an individual compliance obligation. To access the Compliance Obligations Detail Report, choose the desired obligation from the CITSS Compliance Obligation Report. The following figure is a screenshot of the CITSS Compliance Obligations Report. The screenshot shows the search fields for 2018-2020 Full Compliance Obligations, and the resulting 2018-2020 Full Compliance Obligation identified for Airship Assemblers.

**Figure: Screenshot of the CITSS Compliance Obligations Report**  
[Home](#) > [Representative Reports](#) > [Compliance Obligations – Current Tab](#)

**Compliance Obligations**

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**

Budget Year(s): 2015-2017, 2018, 2019, 2018-2020

Obligation Type: Annual, **Triennial**, Quadrennial

CITSS Entity ID: CA3644

Entity Legal Name:

Results per page: 10

Obligation Period	Compliance Deadline	Obligation Period Status	CITSS Entity ID	Entity Legal Name	Compliance Obligation	Updated Date/Time
2018-2020 Triennial	2021-11-01 20:00:00 EDT	Open	<a href="#">CA3644</a>	Airship Assemblers	30,000	2021-07-20 15:33:48 EDT

[CSV](#) [Excel](#) 1 record

On the Compliance Obligations Report (figure shown above), the Current Tab is the default page with filters to view current or future compliance obligations. The Past Tab must be selected to review the information for past compliance obligations. This screen provides general information about the compliance obligation including the Obligation Period, Compliance Deadline, Obligation Period Status, CITSS Entity ID, Entity Legal Name, and the amount of the Compliance Obligation. To view the details of an individual compliance obligation, select the [CITSS Entity ID \(hyperlink\)](#) to open the Compliance Obligation Detail Report for the selected obligation.

The following figure is a screenshot of the CITSS Compliance Obligation Detail Report. The text section following the figure describes the key parts of the report. Not all components will be available to every entity or obligation.

**Figure: Screenshot of CITSS Compliance Obligation Detail Report**  
 Home > Representative Reports > Compliance Obligations – Current Tab > CITSS Entity ID (hyperlink)

### Compliance Obligation Detail

**Compliance Obligation Information**

Obligation Period: 2018-2020 Triennial  
 CITSS Entity ID: CA3844  
 Entity Legal Name: Airship Assemblers  
 Entity Operating Name: Airship Assemblers  
 Compliance Account Number: CA3844-4803  
 Compliance Status: Pending Fulfilled ?  
 Compliance Deadline: 2021-11-01 20:00:00 EDT ?  
 Updated Date/Time: 2021-07-20 15:33:48 EDT ?

Compliance Obligation: 30,000  
 Instruments Retired: 6,000  
 Balance to Fulfill Obligation: 24,000 ?

Offset Limit: 2,400 ?  
 Instruments in Compliance: 24,000 ?  
 Account to be Retired: [Empty]  
 Additional Instruments Needed in Compliance Account: 0 ?

**Instruments in Compliance Account to be Retired ?**

Vintage	Jurisdiction	Type	Sub-Type	Offset Type	Offset Project ID	Quantity	Receiving Account
2018		Allowance				24,000	Retirement

**Remaining True-up Quantity ?**

Eligible True-up Vintages	Remaining Quantity
2021	1,000
2022	1,000

**Facility Emissions ?**

Budget Year	Facility Name	Facility Operating Name	GHG Emissions Reporting ID	Emissions (metric tons CO <sub>2</sub> e)
2018	Airship Hanger Alpha	Airship Hanger Alpha	000001	5,000
2018	Airship Hanger Beta	Airship Hanger Beta	000002	5,000
2019	Airship Hanger Alpha	Airship Hanger Alpha	000001	5,000
2019	Airship Hanger Beta	Airship Hanger Beta	000002	5,000
2020	Airship Hanger Alpha	Airship Hanger Alpha	000001	5,000
2020	Airship Hanger Beta	Airship Hanger Beta	000002	5,000

[CSV](#) [Excel](#) 6 records

**Assigned True-up Quantity ?**

Budget Year	Facility Operating Name	GHG Emissions Reporting ID	Assigned Vintage	Assigned Quantity
2019	Airship Hanger Alpha	000001	2021	1,000
2020	Airship Hanger Alpha	000001	2022	1,000

[CSV](#) [Excel](#) 2 records

### 1.8.3 Description of the CITSS Compliance Obligation Detail Report

The Compliance Obligation Detail Report presents all the information needed to review an entity's compliance obligation information. Each section of the Compliance Obligation Detail Report contains a purple question mark "?." Hover the mouse over the purple question mark to view additional explanation of the individual topic.

#### *Compliance Obligation Information.*

This section of the Compliance Obligation Detail Report is the most important part of the report. The format is like a math equation.

- "Compliance Obligation" minus "Instruments Retired" equals "Balance to Fulfill Obligation."
- "Balance to Fulfill Obligation" minus "Instruments in Compliance Account to be Retired" equals "Additional Instruments Needed in Compliance Account" to fulfill the obligation.

To assist account representatives, CITSS evaluates the compliance obligation information and determines a Pending Compliance Status. **"Pending Unfulfilled"** indicates there are not sufficient instruments in the compliance account to satisfy the obligation. **"Pending Fulfilled"** indicates there are sufficient instruments in the compliance account to satisfy the obligation.

#### *Instruments in Compliance Account to be Retired*

The "Instruments in Compliance Account to be Retired" section lists the type and number of instruments that CITSS will retire at the compliance deadline.

#### *Remaining True-up Quantity*

"Remaining True-up Quantity" is the balance of unused true-up quantity. "Remaining True-up Quantity" is the maximum number of allowances of the Assigned Vintage that an entity can use as eligible allowances toward fulfillment of the current obligation. "Remaining True-up Quantity" remains useable until the Assigned Vintage becomes current, and the true-up process is no longer required for the allowances to be eligible.

#### *Facility Emissions*

The "Facility Emissions" section identifies the facilities and emissions that contribute to the compliance obligation.

#### *Assigned True-up Quantity*

"Assigned True-up Quantity" is the initial value assigned to adjust for a change in production or required allocation.

## 1.9 UNDERSTANDING A CAISO REQUIREMENT ASSIGNED TO A FULL COMPLIANCE OBLIGATION

### 1.9.1 Key Points

- Covered entities that sell power through the California Independent Systems Operator (CAISO):
  - cannot use allocated allowances to fulfill a compliance obligation resulting from emissions for electricity sold through CAISO; and
  - must purchase allowances to satisfy the CAISO requirement.

CARB allocates allowances to some Electrical Distribution Utilities (EDUs). Those allowances must be consigned to auction and the proceeds used to benefit ratepayers.

When an EDU sells electricity through CAISO, the EDU cannot use allocated allowances to fulfill a compliance obligation resulting from emissions associated to these transactions. An EDU that sells electricity through CAISO must have a quantity of eligible compliance instruments in its compliance account that were not allocated that is at least equal to its compliance obligation resulting from CAISO transactions.

For example, an EDU that generates 300,000 MTCO<sub>2</sub>e of covered emissions incurs a Full Compliance Obligation of 300,000. Of the electricity generated, an amount equal to 5,000 MTCO<sub>2</sub>e of covered emissions was sold through CAISO. The Full Compliance Obligation remains 300,000 (no additional emissions were produced) but a requirement is added to the compliance obligation that the entity have 5,000 allowances in its Compliance Account that were not allocated to the entity.

### CITSS Page: Compliance Obligation Detail Report

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NAICS Code Display Management	Compliance Obligation	300,000
Exchange Management	Instruments Retired	100,000
Cross-Jurisdiction Transfer Permission	Balance to Fulfill Obligation	200,000 ?
Glossary	Offset Limit	24,000 ?
	Instruments in Compliance Account to be Retired	N/A ?
	Additional Instruments Needed in Compliance Account	N/A ?
	Of the Additional Instruments Needed in Compliance Account, number of instruments that must be purchased to satisfy Total CAISO Value	5,000 ?

#### Calculation

- Obligation
- Instruments already retired
- Offset limit
- Instruments needed to comply

#### CAISO Requirement

CAISO requirement is shown here when it exists