

# Regional Greenhouse Gas Initiative CO<sub>2</sub> Budget Trading Program



## Offset Project Consistency Application Forms

### Reduction in Emissions of SF<sub>6</sub>

#### Version 1.1

Issued by:  
Bureau of Energy and Technology Policy  
CT Department of Energy & Environmental Protection  
<http://www.ct.gov/deep/>

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## 1. Overview

To demonstrate that an offset project involving reduction in emissions of SF<sub>6</sub> qualifies for the award of CO<sub>2</sub> offset allowances, a Project Sponsor must submit to the Connecticut Department of Energy & Environmental Protection (“Department”) in accordance with instructions (see accompanying instruction packet) a fully completed *Offset Project Consistency Application – Reduction in Emissions of SF<sub>6</sub> Version 1.1* (“*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 CO<sub>2</sub> Budget Trading Program regulations at [section 22a-174-31a of the Regulations of Connecticut State Agencies](#) (“RCSA”) addressing offset projects and the award of CO<sub>2</sub> offset allowances. All offset application materials and other documents are available at [www.ct.gov/deep/cwp/view.asp?a=2684&Q=440696&depNav\\_GID=1619](http://www.ct.gov/deep/cwp/view.asp?a=2684&Q=440696&depNav_GID=1619).

Before the *Consistency Application* can be completed, the Project Sponsor must establish a general account and obtain an offset project ID code through the RGGI CO<sub>2</sub> Allowance Tracking System (RGGI 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 *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 [www.rggi.org/market/tracking](http://www.rggi.org/market/tracking).

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 months after the project is commenced.
- For an offset project located in one 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 participating state, the *Consistency Application* must be filed in the participating state where the majority of the CO<sub>2</sub>-equivalent emissions reduction or carbon sequestration due to the offset project is expected to occur.

## 2. Submission Instructions

Please complete this form and supporting documents in accordance with [section 22a-174-31a of the RCSA](#), the RGGI Model Rule ([www.rggi.org/documents](http://www.rggi.org/documents)) and accompanying instructions to ensure the proper handling of your application. These instructions are not a substitute for the requirements of the relevant statutes and any regulations thereunder. You should review all applicable laws prior to completing this application. Remember, it is your responsibility to comply with all applicable laws. There is no fee associated with the submission of this application.

Submit one (1) complete hardcopy original *Consistency Application* as well as an electronic copy in the form of a CD disk to the Department at the location specified below. Submit hardcopies of forms requiring signatures as originally-signed copies and scan such signed forms for electronic submission. Facsimiles of the *Consistency Application* are not acceptable under any circumstances.

ATTN: KERI ENRIGHT-KATO  
CO2 BUDGET TRADING PROGRAM  
BUREAU OF ENERGY AND TECHNOLOGY POLICY  
CT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION  
10 FRANKLIN SQUARE  
NEW BRITAIN, CT 06051

If you have any questions about this application, please contact Keri Enright-Kato at [keri.enright-kato@ct.gov](mailto:keri.enright-kato@ct.gov) or at (860) 827-2642.

The *Consistency Application* has three 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.

The Project Sponsor should save an electronic copy for his or her file to serve as a reference for any necessary remediation.

### **3. Consistency Application Forms**

The *Consistency Application* includes ten (10) forms divided into three 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**

**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

<b>Offset Project Name</b>	<b>Offset Project ID Code</b>
<input type="text"/>	<input type="text"/>

**Form 1.2 – General Information**

**Project Sponsor (RGGI COATS Authorized Account Representative)**

<b>Telephone Number</b>	<b>Fax Number</b>	<b>Email Address</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>

**Street Address**

<b>City</b>	<b>State/Province</b>	<b>Postal Code</b>	<b>Country</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**RGGI COATS General Account Name**

**RGGI COATS General Account Number**

<b>Name of Offset Project</b>	<b>Application Date</b>
<input type="text"/>	<input type="text"/>

**Summary Description of Offset Project**

<b>Project City</b>	<b>Project County</b>	<b>Project State</b>	<b>Project Commencement Date</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Project Sponsor Organization**

**Primary Street Address**

<b>City</b>	<b>State/Province</b>	<b>Postal Code</b>	<b>Country</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Brief Description of Project Sponsor Organization**

<b>Telephone Number</b>	<b>Website URL</b>
<input type="text"/>	<input type="text"/>

<b>Independent Verifier (Company/Organization)</b>	<b>States Where Verifier Accredited</b>
<input type="text"/>	<input type="text"/>

<b>Primary Street Address</b>	<b>Website URL</b>
<input type="text"/>	<input type="text"/>

<b>City</b>	<b>State/Province</b>	<b>Postal Code</b>	<b>Country</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Point of Contact for Project**

<b>Contact Telephone Number</b>	<b>Contact Fax Number</b>	<b>Contact Email Address</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>

**Contact Street Address**

<b>City</b>	<b>State/Province</b>	<b>Postal Code</b>	<b>Country</b>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**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.
3. The offset project referenced in this *Consistency Application* has not and will not receive any funding or other incentives from any disbursement of CO<sub>2</sub> allowance-derived proceeds pursuant to section 22a-174-31 of the RCSA or from any system benefit funds collected and disbursed pursuant to subsections 16-245(m) and (n) of the Connecticut General Statutes (“CGS”).
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 CO<sub>2</sub> 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 CO<sub>2</sub> 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.

\_\_\_\_\_  
Signature of Project Sponsor

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date (MM/DD/YYYY)

\_\_\_\_\_  
Name of Project Sponsor (printed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Organization

\_\_\_\_\_  
Notary

**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, CO<sub>2</sub> offset allowances under the CO<sub>2</sub> Budget Trading Program is predicated on the Project Sponsor following all the requirements of section 22a-174-31a of the RCSA. 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 CO<sub>2</sub> offset allowance under section 22a-174-31a of the RCSA is contingent on meeting the requirements of section 22a-174-31a of the RCSA. The Project Sponsor authorizes the Department 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 Connecticut.

\_\_\_\_\_  
Signature of Project Sponsor

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date (MM/DD/YYYY)

\_\_\_\_\_  
Name of Project Sponsor (printed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Organization

\_\_\_\_\_  
Notary

**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 CO<sub>2</sub> 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 CO<sub>2</sub> 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.

**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.

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 SF<sub>6</sub> emissions rate for the transmission and/or distribution entity. Enter the applicable emissions rate performance standard at subdivision 22a-174-31a(e)(1)(B), Tables 31a-1 A and B) that applies to the transmission and/or distribution entity.

**Baseline SF<sub>6</sub> 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 of the following factors prevent optimal management of SF<sub>6</sub>:

- 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 SF<sub>6</sub> 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.

**Offset Project Name**

**Offset Project ID Code**

**Form 2.3 – Emissions Baseline**

Provide the Entity-wide SF<sub>6</sub> 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. Using data from the Entity-wide SF<sub>6</sub> Inventory Tracking System, enter the requested information below.

**Baseline Year**

**Baseline Year Emissions Rate**

Enter the following data for the baseline year (all SF<sub>6</sub> values in lbs):

<b>V<sub>iby</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> inventory in cylinders, gas carts, and other storage containers (not SF <sub>6</sub> -containing operating equipment) at the beginning of the reporting year
<b>V<sub>iey</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> inventory in cylinders, gas carts, and other storage containers (not SF <sub>6</sub> -containing operating equipment) at the end of the reporting year
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Change in SF<sub>6</sub> Inventory in cylinders, gas carts, and other storage containers (not SF<sub>6</sub>-containing operating equipment) (V<sub>iby</sub> - V<sub>iey</sub>)</b>
<b>PA<sub>psd</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> purchased from suppliers or distributors in cylinders
<b>PA<sub>e</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> provided by equipment manufacturers with or inside SF <sub>6</sub> -containing operating equipment
<b>PA<sub>rre</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> returned to the reporting entity after off-site recycling
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Total Purchases/Acquisitions (PA<sub>psd</sub> + PA<sub>e</sub> + PA<sub>rre</sub>)</b>
<b>SD<sub>op</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	Sales of SF <sub>6</sub> to other parties, including gas left in SF <sub>6</sub> -containing operating equipment that is sold
<b>SD<sub>rs</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	Returns of SF <sub>6</sub> to supplier (producer or distributor)
<b>SD<sub>df</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> sent to destruction facilities
<b>SD<sub>sor</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	SF <sub>6</sub> sent off-site for recycling
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Total Sales/Disbursements (SD<sub>op</sub> + SD<sub>rs</sub> + SD<sub>df</sub> + SD<sub>sor</sub>)</b>
<b>CNP<sub>ne</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	Total SF <sub>6</sub> nameplate capacity of new SF <sub>6</sub> -containing operating equipment at proper full charge
<b>CNP<sub>rse</sub></b>	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	Total SF <sub>6</sub> nameplate capacity of retired SF <sub>6</sub> -containing operating equipment at proper full charge
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Total Change in SF<sub>6</sub> Nameplate Capacity (CNP<sub>ne</sub> - CNP<sub>rse</sub>)</b>
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Total SF<sub>6</sub> Emissions (lbs) [(V<sub>iby</sub> - V<sub>iey</sub>) + (PA<sub>psd</sub> + PA<sub>e</sub> + PA<sub>rre</sub>) - (SD<sub>op</sub> + SD<sub>rs</sub> + SD<sub>df</sub> + SD<sub>sor</sub>) - (CNP<sub>ne</sub> - CNP<sub>rse</sub>) ]</b>
	<input style="width: 80%; height: 16px;" type="text"/>	<b>=</b>	<b>Total SF<sub>6</sub> Emissions (Tons CO<sub>2e</sub>) [(Total SF<sub>6</sub> Emissions (lbs) x GWP of SF<sub>6</sub> (22,200))/2000]</b>

**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.

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. SF<sub>6</sub> Inventory Management and Auditing Protocol, which documents the following components:
  - Description of the Entity-wide SF<sub>6</sub> 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.

**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 subsections 22a-174-31a(c) and (e) of the RCSA, 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 subsection 22a-174-31a(e) of the RCSA 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 subsection 22a-174-31a(e) of the RCSA 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.

\_\_\_\_\_  
Signature of Verifier Representative

\_\_\_\_/\_\_\_\_/\_\_\_\_\_  
Date (MM/DD/YYYY)

\_\_\_\_\_  
Name of Verifier Representative (printed)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Notary