

To have your project accomplishments recorded in the EPAAct 1605(b) database, you must certify each year that the project continues to perform as expected. As you certify each year's accomplishments, EIA will transfer the data from the database of prospective accomplishments to the EPAAct 1605(b) database.

You may also modify your estimates of past accomplishments at any time for any of several reasons. For example, if events following the commencement of the project are different than expected, you may wish to modify your model to more closely reflect actual events. Alternatively, you may simply find modeling or engineering estimation methods that you believe to be more accurate than those you initially employed. You may even decide to carry out field measurements where you had not initially anticipated doing so. Whatever your reason, you can modify the existing estimates to reflect your more accurate estimates of both your past accomplishments recorded in the EPAAct 1605(b) database and your expected accomplishments recorded in the database of prospective accomplishments. However, you should provide clear documentation of how you derived the revised estimate.

#### *GG-5.9 How Far Back May I Report Projects?*

A primary purpose of the program is to record emissions reductions, not to track when projects were initiated. Therefore, you may report new or ongoing projects that have achieved reductions beginning January 1, 1991. However, for any project, you must establish a credible reference case and retain that reference case for all your reports of that project. If you use historic data to construct your reference case, you should not use data earlier than 1987. If you change your reference case, you must amend any previous reports for that project to account for the amended reference case.

*Example:* You initiated a project in 1991 that reduced emissions from their 1990 levels. This project is reportable.

*Example:* You initiated a project earlier than 1987 that has decreased emissions every year relative to each previous year. You may establish either a basic or modified reference case based on what emissions would have been without the project (using only data from 1987 on), then report the emissions reductions from the project for 1991 and subsequent years.

*Example:* You initiated a project earlier than 1987 that reduced emissions to a level that stabilized during (or before) the baseline years 1987–1990. This project would not be reportable, since the reductions were achieved prior to the period covered by the EPAAct 1605(b) reporting program.

*Example:* You have an ongoing DSM program to encourage replacement of appliances or equipment. You would not be able to report achievements before 1991, but any appliances replaced in 1991 or after that year are new reductions and could be reported.

*Example:* You have been installing windmills every year for 10 years. In order to report emissions reductions for 1991, you would need to demonstrate that the 1991

windmill displaced emissions-producing generation. If the windmill replaced another, the project would not be reportable.

These are relatively straightforward examples when you construct historic reference cases. Your analysis becomes more complex when you wish to construct modified reference cases. In general, you should not use data from years before 1987 except as additional support for your assertion of what modified levels would have been after 1987.

#### *GG-5.10 Must I Take Into Account the Different Effects of Different Greenhouse Gases?*

Your reports on emissions and emission reductions will include data on greenhouse gases in tons of each gas emitted; you will not be required to calculate the various effects of different gases on climate for this voluntary reporting program. However, you may wish to perform these calculations for your own purposes. For example, you may wish to evaluate the costs of competing proposed projects in terms of the beneficial effects on climate; in order to do so, you may wish to look at these effects using a common index, such as the equivalent effect in tons of carbon dioxide. You may wish to talk about such equivalencies with various stakeholders or for public relations purposes.

The Intergovernmental Panel on Climate Change has developed an index that compares the impact that each gas has on global warming relative to the effect that carbon dioxide has. Information about this index, called the Global Warming Potential (GWP), is presented in Appendix E, along with GWPs for the types of gases covered by this reporting program. If you wish to use the index, remember that it does not take into account some complexities of atmospheric chemistry and that the underlying science is evolving.

#### *GG-5.11 Is It Necessary To Report Emissions Reductions and Carbon Sequestration Every Year?*

This is a voluntary reporting program. You are under no legal obligation to continue reporting. However, you should recognize that the usefulness of your initial reports may be affected by your participation in the program in subsequent years.

If you report emissions reductions for a period of time, and then fail to report thereafter, the user of the database is likely to assume that your project is no longer reducing emissions relative to the reference case. However, this does not negate the value of the reductions accomplished while the project was in place.

Reporting carbon sequestration projects raises a different type of problem. If you report carbon capture for a number of years and then cease reporting, a database user is apt to assume that the carbon that had been captured has been released back to the atmosphere. This not only limits recognition of any accomplishments that may have occurred following cessation of your reports, but largely negates the value of accomplishments already reported.

You or your firm may find that, following successfully reporting to the voluntary

reporting program for several years, you miss one or more years of reporting. If you choose to resume reporting, your initial report should contain information not only for the most recent reporting year, but also, if possible, for all of the intervening years during which you did not report. This will ensure that the EPAAct 1605(b) database reflects a continuous record of your activities, thereby increasing the credibility of all your reports.

#### *GG-5.12 May I Amend My Previous Years' Reports?*

If you have submitted reports under this program but afterwards develop better data (for example through field measurements or utility-specific emissions factors), or better estimation methods (for example, your organization's adoption of standard analytic procedures), you may amend your previous reports. You may also need to amend reports because you have amended your reference case for a particular project. Your amended reports should clearly state your reasons for amendment and the bottom-line difference that results from the amendment. The following case study discusses an instance in which a reporter chose to amend previous reports.

#### *Case 4: Black Forest Cake, Inc.—Long-Term Project Reporting*

**Note:** This example illustrates only one approach to analyzing a project; your analysis, methods, and calculations will vary depending on your particular circumstances, the geographic location of the project, and other factors.

Black Forest Cake, Inc. (BFCI) was a family-owned business that was experiencing extremely rapid growth in demand for its products, which included baked goods produced at 13 sites in five states, catering services at 10 shops in seven states, and equipment rentals at 15 stores in three states. It operated from a total of 23 sites spread across nine states.

The family members and many of their staff were environmentally conscious. While they were delighted with the increased demand for their products, they were concerned to see their energy consumption rising, particularly their natural gas consumption for baking ovens and space heating, and their gasoline use in delivery vehicles. They knew that increased energy use signaled increased greenhouse gas emissions.

Therefore, BFCI decided to voluntarily offset some of the increase in emissions by undertaking a tree-planting (carbon sequestration) project on farmland they owned. They were not interested in receiving official recognition for their effort. They were motivated purely by their interest in environmental protection and a desire to project an image of BFCI as a "good global citizen." They did, however, want to be sure that their project actually reduced net carbon dioxide emissions, not just appear to do so. Therefore, BFCI decided that its project should at least meet the minimum reporting standards used by DOE in the EPAAct 1605(b) voluntary greenhouse gas reporting program.

In its first report following the establishment of the tree stand, BFCI