Regional Greenhouse Gas Initiative
CO_2 Budget Trading Program

Offset Project Consistency Application Forms

Avoided Methane Emissions from Agricultural Manure Management

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 agricultural manure management offset project qualifies for the award of CO_2 offset allowances, a Project Sponsor must submit to the Connecticut Department of Energy & Environmental Protection ("Department") in accordance with instructions (see accompanying instructions packet) a fully completed *Offset Project Consistency Application – Avoided Methane Emissions from Agricultural Manure Management Version* 1.2 ("*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_2 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_2 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.

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_2 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.

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_2-equivalent emissions reduction 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 (www.ct.gov/deep/lib/deep/air/regulations/mainregs/22a-174-31a.pdf), the RGGI Model Rule (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* and one (1) 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: STEFANIE WNUCK
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 Stefanie Wnuck at stefanie.wnuck@ct.gov or at (860) 827-2846.

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 in 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 nine (9) 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 – 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 3.1 – 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.
3. Check the boxes that apply:
   - ☐ The offset project referenced in this *Consistency Application* ***has not and will not receive*** any funding or other incentives from any disbursement of CO2 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 Statues ("CGS").
   - ☐ The offset project referenced in this *Consistency Application* ***has received or will receive*** funding or other incentives from any disbursement of CO2 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 CGS. However, the following conditions apply:
     - ☐ The offset project is located in a state with a market penetration rate for anaerobic digester projects of 5 percent or less. Documentation that the offset project meets this criterion is attached to Form 2.2.
     - ☐ The offset project is located at a farm with 4,000 or less head of dairy cows or equivalent animal units. Documentation that the offset project meets this criterion is attached to Form 2.2.
     - ☐ The offset project is a regional-type digester designed for animal manure input less than the average annual manure produced by a farm with 4,000 or less head of dairy cows or equivalent animal units. Documentation that the offset project meets this criterion is attached to Form 2.2.
4. Check the boxes that apply:
   - ☐ The offset project referenced in this *Consistency Application* ***does not*** include an electric generation component.
   - ☐ The offset project referenced in this *Consistency Application* ***does*** include an electric generation component. However, the following conditions apply:
     - ☐ Any and all attribute credits generated by the offset project that may be used for compliance with a renewable portfolio standard (RPS) or other regulatory requirement, with the exception of CO_2 allowances awarded under the CO_2 Budget Trading Program, will be transferred to the Department. An Attribute Credit Transfer Agreement is attached.
     - ☐ The offset project is located in a state with a market penetration rate for anaerobic digester projects of 5 percent or less. Documentation that the offset project meets this criterion is attached to Form 2.2.
     - ☐ The offset project is located at a farm with 4,000 or less head of dairy cows or equivalent animal units. Documentation that the offset project meets this criterion is attached to Form 2.2.
     - ☐ The offset project is a regional-type digester designed for animal manure input less than the average annual manure produced by a farm with 4,000 or less head of dairy cows or equivalent animal units. Documentation that the offset project meets this criterion is attached to Form 2.2.
5. 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.

Offset Project Name	***Offset Project ID Code***

6. All offset projects for which the Project Sponsor or project sponsor organization has received CO_2 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_2 Budget Trading Program in all participating states.
7. 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_2 offset allowances under the CO_2 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_2 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_2 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_2 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 by 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 following required information is included in the attached detailed project narrative:

☐ 1. Offset project owner and operator information

☐ 2. Offset project location and specifications

☐ 3. Influent facility location and specifications (for all facilities providing influent to the anaerobic digester)

☐ 4. Equipment specifications and project schematic

Offset Project Name	***Offset Project ID Code***

Form 2.2 – Demonstration of Eligibility

Attach documentation to demonstrate offset project eligibility. Each attachment must include a header that indicates it is an attachment to Form 2.2 and includes the offset project name and offset project ID code.

A. ***Demonstration of Eligibility (applicable to all offset projects)***

Check the boxes below to indicate that the following required documentation is attached:

☐ 1. Demonstration of uncontrolled anaerobic storage (for each facility providing influent to the anaerobic digester)

☐ 2. Documentation of digester system feedstock (documentation that at least 50-percent of the total annual mass input into the anaerobic digester consists of livestock manure)

B. ***Demonstration of Conditional Eligibility (applicable to certain offset projects)***

If the offset project meets certain specifications, it may be eligible for the award of CO_2 offset allowances even if the following apply:

- The offset project received or will receive funding or other incentives from any disbursement of CO2 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 CGS.
- The offset project includes an electric generation component and the Project Sponsor or project sponsor organization retains the legal rights to any and all attribute credits generated by the offset project that may be used for compliance with a renewable portfolio standard (RPS) or other regulatory requirement.

Check one or more of the boxes below, as appropriate, to indicate that the following documentation is attached to demonstrate conditional eligibility:

☐ 1. The market penetration rate for anaerobic digesters in Connecticut is five (5) percent or less

☐ 2. The offset project is located at a farm with 4,000 or less head of dairy cows or equivalent animal units

☐ 3. The offset project is a regional-type digester designed for annual manure input less than would be produced by a farm with 4,000 or less head of dairy cows or equivalent animal units

Offset Project Name	***Offset Project ID Code***

Form 2.3 – Monitoring and Verification Plan

Provide the Monitoring and Verification Plan (M&V Plan) 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.

Check the boxes below to indicate that the M&V Plan includes the following required information:

☐ 1. ***Documentation of Methane Generation Calculation Procedures***. Spreadsheet documenting equations and project-specific data sources for each influent-generating facility that will be used to calculate monthly baseline methane emissions

☐ 2. ***Influent Monitoring Procedures***. Documentation of monitoring procedures to be used at each facility supplying manure and/or organic food waste influent to the anaerobic digester

☐ 3. ***Documentation of Methane Captured and Destroyed***. Spreadsheet documenting calculations and project-specific data sources that will be used to quantify annual volume of methane captured and destroyed by the anaerobic digester

☐ 4. ***Documentation of Transport CO_2 Emissions (only applicable to regional-type digesters).*** Spreadsheet documenting procedures to be used to quantify CO_2 emissions due to transportation of manure and organic food waste from facilities where the manure and organic food waste were generated to the anaerobic digester

☐ 5. ***Quality Assurance/Quality Control (QA/QC) Procedures***. Documentation of QA/QC procedures for equipment to be used to measure biogas volumetric flow and methane concentration

☐ 6. ***Documentation of Measuring and Monitoring Equipment Maintenance, Operation, and Calibration***. Documentation of record keeping protocol that will be used to ensure that required actions are performed and documented

☐ 7. ***Record Keeping and Records Retention Protocol***. Documentation of record keeping and records retention protocol that will be used to maintain documentation throughout the duration of the offset project

Offset Project Name ***Offset Project ID Code***

Form 3.1 – Independent Verifier Certification Statement and Report

An accredited verifier must sign and date the form. 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 (h) 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(h), 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(h) 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