

Compliance in Emissions Trading Systems

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Entergy

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U.S. SO₂ and NO_x Trading System

- Cap and Trade – annual allowance allocations
- Continuous Emissions Measurement Systems (CEMs)
- US EPA managed registry
- Compliance accountability & consequences clearly established



CEMs

- Monitoring Plan for SO₂, NO_x, CO₂, heat input, flow measurement
- RATAs
- QA
 - Daily Calibrations
 - Daily Interference tests
- Quarterly Electronic Data Reports Submittals & Audit
- Annual Reconciliation

Compliance Certifications

- Designated Representative established
 - “I certify under penalty of law that I have personally examined and are familiar records & statements...
 - “Based on inquiries of individuals with primary responsibility for information, I certify that records and statements are true accurate and complete”
- Certifications required with Quarterly Reports and with Annual Reconciliation Compliance Certification Report



Registry

- US EPA Clean Air Markets Division manages registry
- Annual serialized allocations placed in unit accounts in the beginning of the year
- Past year balances retained and can be carried forward
- Flow control maybe required in NOx program
- Purchases or sale of allowances can be transacted
- Allowances can be moved from one account to another
- Allowances used per CEMs report are debited at end of the year



Confidence Through Compliance

- CEMs with QA & Audits verify the currency
- Clear responsibility and strict accountability placed on source owner
- Programs and Registry managed by US EPA Clean Air Markets Division
 - Giving credibility
 - Easy to use platform
- Transparent
 - Publicly accessible electronic database
 - annual compliance reports

