Instructions for Submitting Applications for Offsets Projects

Consistency Applications
1. Complete and sign Section I - Consistency Application.
2. Attach all required documentation in Section I, including reports, diagrams, statements, specifications, plans, calculations, and certifications.
3. Check the box on Section II – Independent Verifier Report for Consistency Application.
5. Attach all required documentation in Section II, including reports, diagrams, statements, specifications, plans, calculations, and certifications.
6. Submit to the Department: 1) hard copies of all required documentation and 2) electronic copies of all required documentation on a CD or DVD. Identify the offset project name and I.D. code on the face of the CD or DVD.

Mail original applications and documentation to:

Maryland Department of the Environment
Air Quality Planning Program, Offsets
1800 Washington Boulevard
Baltimore MD 21230

Monitoring and Verification Applications
1. Check the box on Section II – Independent Verifier Report for Monitoring and Verification.
3. Attach all required documentation in Section II, including reports, diagrams, statements, specifications, plans, calculations, and certifications.
4. Complete and sign Section III – Monitoring and Verification.
5. Attach all required documentation in Section III, including reports, diagrams, statements, specifications, plans, calculations, and certifications.
6. Submit to the Department: 1) hard copies of all required documentation and 2) electronic copies of all required documentation on a CD or DVD. Identify the offset project name and I.D. code on the face of the CD or DVD.

Mail original applications and documentation to:

Maryland Department of the Environment
Air Quality Planning Program, Offsets
1800 Washington Boulevard
Baltimore MD 21230

- For offsets projects commenced before January 1, 2009, a consistency application must be submitted by June 30, 2009.
- For offsets projects commenced on or after January 1, 2009, a consistency application must be submitted within 6 months after the commencement of the offset project.
- Contact Scott Zacharko, Air Quality Planning Program at (410) 537-4177 with questions or for further guidance.
MARYLAND DEPARTMENT OF THE ENVIRONMENT
1800 Washington Boulevard  ●  Baltimore Maryland  21230
(410) 537-3000  ●  1-800-633-6101  ●  http://www.mde.state.md.us

MARYLAND CO₂ BUDGET TRADING PROGRAM
COMAR 26.09.03

<table>
<thead>
<tr>
<th>COATS Offset Project Name</th>
<th>COATS Offset Project I.D. Code</th>
</tr>
</thead>
</table>

Reduction in Emissions of Sulfur Hexafluoride (SF₆) Offset Application
Section I – Consistency Application

An indication of “Yes” to any of the following will deem the project ineligible under COMAR 26.09.03.

<table>
<thead>
<tr>
<th>Eligibility Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>E.1 Did the offset project initially commence before December 20, 2005?</td>
</tr>
<tr>
<td>COMAR 26.09.03.02A</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
<tr>
<td>E.2 Is the offset project required by a local, state, or federal law, regulation or administrative or judicial order?</td>
</tr>
<tr>
<td>COMAR 26.09.03.02D(2)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
<tr>
<td>E.3 Does the offset project include an electric generation component that is additionally being used for compliance with a renewable energy portfolio standard or other regulatory requirement?</td>
</tr>
<tr>
<td>COMAR 26.09.03.02D(4)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
<tr>
<td>E.4 Does the offset project receive funding or other incentives provided through the Strategic Energy Investment Fund?</td>
</tr>
<tr>
<td>COMAR 26.09.03.02D(5)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
<tr>
<td>E.5 Is the offset project awarded credits or allowances under any other mandatory or voluntary greenhouse gas program?</td>
</tr>
<tr>
<td>COMAR 26.09.03.02D(6)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
</tbody>
</table>

An indication of “No” to any of the following will deem the project ineligible under COMAR 26.09.03.

<table>
<thead>
<tr>
<th>Eligibility Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>E.6 Does the offset project consist of incremental actions beyond those taken during the baseline year to achieve a reduction in SF₆ emissions relative to the baseline year?</td>
</tr>
<tr>
<td>COMAR 26.09.03.04A(2)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
<tr>
<td>E.7 Are the identified actions to be taken consistent with the guidance provided in International Electrotechnical Commission (CEI/IEC), IEC TR 61634: High-voltage switchgear and control gear – Use and handling of sulfur hexafluoride (SF₆) in high-voltage switchgear and control gear?</td>
</tr>
<tr>
<td>COMAR 26.09.03.04A(3)</td>
</tr>
<tr>
<td>□ Yes</td>
</tr>
</tbody>
</table>
Complete the following information (all fields are required):

### Project Sponsor Information

<table>
<thead>
<tr>
<th>Organization Name</th>
<th>Project Sponsor Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Address</td>
<td></td>
</tr>
<tr>
<td>City</td>
<td>State/Province</td>
</tr>
<tr>
<td>Postal Code</td>
<td>Country</td>
</tr>
<tr>
<td>Telephone and Facsimile Transmission Number</td>
<td>E-Mail Address</td>
</tr>
<tr>
<td>COATS General Account Number</td>
<td>Offset Project Date of Commencement</td>
</tr>
</tbody>
</table>

See COMAR 26.09.03.02G(2)

### Point of Contact Information

<table>
<thead>
<tr>
<th>Point of Contact Name</th>
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<tbody>
<tr>
<td>Street Address</td>
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<tr>
<td>Telephone and Facsimile Transmission Number</td>
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</tbody>
</table>

### Transmission or Distribution Entity Location

<table>
<thead>
<tr>
<th>Transmission or Distribution Entity Organization Legal Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Street Address</td>
</tr>
</tbody>
</table>

<table>
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<tr>
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<tbody>
<tr>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
All applicants must provide the following information as attachments to this application. Each attachment must be identified by attachment number as provided below, as well as the offset project name and offset project I.D. code.

<table>
<thead>
<tr>
<th>Attachment Number</th>
<th>Description</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>I.1</td>
<td>A detailed narrative of the actions to be taken as part of the offset project, including an explanation of how the projected reduction or avoidance of atmospheric loading, or the sequestration of carbon is to be quantified, monitored, and verified. COMAR 26.09.03.02H(1)(b), COMAR 26.09.03.02H(1)(c), COMAR 26.09.03.04C(1)</td>
<td></td>
</tr>
<tr>
<td>I.2</td>
<td>Documentation that the offset project meets applicable Eligibility Requirements (E.1 through E.7 on page 1 of this application) and baseline emissions. COMAR 26.09.03.02H(1)(c)</td>
<td></td>
</tr>
<tr>
<td>I.3</td>
<td>The emissions baseline determination, unless otherwise requested in COMAR 26.09.03.04D. COMAR 26.09.03.02H(1)(d)</td>
<td></td>
</tr>
<tr>
<td>I.4</td>
<td>A statement and certification report certifying that all offset projects for which the project sponsor has received CO₂ offset allowances under the project sponsor’s ownership or control are in compliance with all applicable requirements in all participating states. COMAR 26.09.03.02H(1)(g)</td>
<td></td>
</tr>
<tr>
<td>I.5</td>
<td>A statement regarding the adequacy of the monitoring and verification plan and other evaluations and statements as required by the Department. COMAR 26.09.03.02H(1)(j)</td>
<td></td>
</tr>
<tr>
<td>I.6</td>
<td>Disclosure of any voluntary or mandatory programs to which greenhouse gas emissions data related to the offset project has been or will be reported. COMAR 26.09.03.02H(1)(k)</td>
<td></td>
</tr>
<tr>
<td>I.7</td>
<td>For offset projects located in a state or United States jurisdiction that is not a participating state, a demonstration that the project sponsor has complied with all requirements of the cooperating regulatory agency in the state or United States jurisdiction where the offset project is located. COMAR 26.09.03.02H(1)(l)</td>
<td></td>
</tr>
<tr>
<td>I.8</td>
<td>If the offset project does not have an SF₆ entity-wide emissions rate for the baseline year that is less than the applicable emissions rate for the appropriate region, attach an explanation of how two of the factors outlined in COMAR 26.09.03.04B prevent optimal management of SF₆.</td>
<td></td>
</tr>
<tr>
<td>I.9</td>
<td>A description of the transmission or distribution entity in sufficient detail to specify the service territory served by the entity. COMAR 26.09.03.04C(2)(a)</td>
<td></td>
</tr>
<tr>
<td>I.10</td>
<td>The name, address, email address, telephone number, and facsimile transmission number of the owner and operator of the transmission or distribution entity. COMAR 26.09.03.04C(2)(b)</td>
<td></td>
</tr>
<tr>
<td>I.11</td>
<td>Provisions for verification of tracking and accounting of all entity-wide uses of SF₆ in order to determine entity-wide emissions of SF₆ including all electric transmission and distribution assets and all SF₆-containing and SF₆-handling equipment owned or operated by the reporting entity. COMAR 26.09.03.04D(3)</td>
<td></td>
</tr>
<tr>
<td>I.12</td>
<td>Certified monitoring and verification plan, including an SF₆ inventory management and auditing protocol and a process for quality assurance and quality control of inventory data. COMAR 26.09.03.04E(3)</td>
<td></td>
</tr>
</tbody>
</table>
**Consistency Application Agreement**

“The undersigned project sponsor recognizes and accepts that the application for, and the receipt of, CO₂ offset allowances under the CO₂ Budget Trading Program is predicated on the project sponsor complying with all applicable requirements. I have been granted all the necessary authority to carry out the duties and responsibilities for the offset project under this subtitle. I understand that eligibility for the award of CO₂ offset allowances is contingent on meeting all applicable requirements. I authorize 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. I understand that the Department’s right to audit shall include the right to enter the physical location of the offset project. I submit to the legal jurisdiction of the State.”

COMAR 26.09.03.02H(1)(f)

**Access Agreement Statement**

“The undersigned project sponsor agrees to provide the Department access to the physical location of the offset project to inspect for compliance. For offset projects located in any state or other U.S. jurisdiction that is not a participating state, the undersigned project sponsor agrees to provide the cooperating regulatory agency with access to the physical location of the offset project to inspect for compliance.”

COMAR 26.09.03.02F(1)

**Statement of Truth, Accuracy, and Completeness**

“I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

COMAR 26.09.03.02H(1)(i)

**Signature of Applicant (Project Sponsor)  Date**

**Applicant’s (Project Sponsor’s) Name (Print)  Title**

For questions regarding this application form, please contact the Department at (410) 537-3240
## Reduction in Emissions of Sulfur Hexafluoride (SF₆) Offset Application

### Section II – Independent Verifier Report

The following information is being provided for:

- [ ] Consistency Application
- [ ] Monitoring and Verification

Complete the following information (all fields are required):

**Independent Verifier Information**  
*(Required for Consistency Application and Monitoring and Verification Report)*

<table>
<thead>
<tr>
<th>Independent Verifier Organization Legal Name</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Independent Verifier Point of Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Physical Street Address</th>
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<table>
<thead>
<tr>
<th>Telephone Number</th>
<th>E-Mail Address</th>
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<td></td>
</tr>
</tbody>
</table>

All applicants must provide the following information as attachments to this application. Each attachment must be identified by attachment number as provided below, as well as the offset project name and offset project I.D. code.

### Attachment Number, (if submitting for Consistency Application):

| II.1 | A verification report.  
COMAR 26.09.03.02H(1)(b) |
| II.2 | A certified entity-wide inventory of all SF₆-containing operating equipment and all other SF₆-related items, including cylinders, gas carts, and other storage containers used by the entity. 
COMAR 26.09.03.04E(2) |

### Attachment Number, (if submitting for Monitoring and Verification):

| II.3 | An annual monitoring and verification report that includes a certified current entity-wide inventory of all SF₆-containing operating equipment and all other SF₆-related items, including cylinders, gas carts, and other storage containers used by the entity. 
COMAR 26.09.03.04E |
**Certification Statement**

“I certify, under penalty of law, that I, the independent verifier, have reviewed the entire application and evaluated the report in relation to all applicable requirements and any applicable guidance issued by the Department.”

COMAR 26.09.03.02H(1)(b)

<table>
<thead>
<tr>
<th>COATS Offset Project Name</th>
<th>COATS Offset Project I.D. Code</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Statement of Truth, Accuracy, and Completeness**

“I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

COMAR 26.09.03.02H(1)(i)

<table>
<thead>
<tr>
<th>Signature of Independent Verifier</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Independent Verifier’s Name (Print)</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For questions regarding this application form, please contact the Department at (410) 537-3240
**Reduction in Emissions of Sulfur Hexafluoride (SF₆) Offset Application**

**Section III – Monitoring and Verification**

Complete the following information (all fields are required):

<table>
<thead>
<tr>
<th><strong>Project Sponsor Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Organization Name</strong></td>
</tr>
<tr>
<td><strong>Street Address</strong></td>
</tr>
<tr>
<td><strong>City</strong></td>
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<tr>
<td><strong>Telephone and Facsimile Transmission Number</strong></td>
</tr>
</tbody>
</table>
| **COATS General Account Number** | **Offset Project Date of Commencement**
See COMAR 26.09.03.02G(2) |

<table>
<thead>
<tr>
<th><strong>Point of Contact Information</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Point of Contact Name</strong></td>
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<tr>
<td><strong>Street Address</strong></td>
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<tr>
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All applicants must provide the following information as attachments to this application. Each attachment must be identified by attachment number as provided below, as well as the offset project name and offset project I.D. code.

**Attachment Number:**

<table>
<thead>
<tr>
<th>Attachment Number</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>III.1</td>
<td>A statement regarding the adequacy of the monitoring and verification plan. COMAR 26.09.03.02H(i)</td>
</tr>
<tr>
<td>III.2</td>
<td>The name, address, email address, telephone number, and facsimile transmission number of the owner and operator of the transmission or distribution entity. COMAR 26.09.03.04C(2)(b)</td>
</tr>
<tr>
<td>III.3</td>
<td>The emissions baseline determination, as per COMAR 26.09.03.04D(4) and COMAR 26.09.03.04D(5). (Attach all calculations)</td>
</tr>
<tr>
<td>III.4</td>
<td>The emissions reductions calculations. (Attach all calculations) COMAR 26.09.03.04D(6)</td>
</tr>
</tbody>
</table>
| III.5             | Identification of the facilities managed by the entity from which all SF₆ gas is procured and disbursed and documentation to support maintaining an entity-wide log of SF₆ gas procurements and dispersals, including:  
  • The weight of each cylinder transported before shipment from the facility and the weight of each cylinder after return to the facility.  
  • A specific cylinder log for each cylinder that is used to fill equipment with SF₆, or reclaim SF₆ from equipment, which is retained with the cylinder.  
  • The location and specific identifying information of the equipment being filled, or from which SF₆ is reclaimed, and the weight of the cylinder before and after this activity. COMAR 26.09.03.04E(1), COMAR 26.09.03.04E(1)(a), COMAR 26.09.03.04E(1)(b), COMAR 26.09.03.04E(1)(c) |
| III.6             | A current entity-wide inventory of all SF₆-containing operating equipment and all other SF₆-related items, including cylinders, gas carts, and other storage containers used by the entity. COMAR 26.09.03.04E(2) |
| III.7             | Annual update to the certified monitoring and verification plan, including an SF₆ inventory management and auditing protocol and a process for quality assurance and quality control of inventory data. COMAR 26.09.03.04E(3) |
Statement of Truth, Accuracy, and Completeness

“I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision and in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

COMAR 26.09.03.02H(1)(i)

Signature of Project Sponsor                      Date

Project Sponsor’s Name (Print)                      Title

For questions regarding this application form, please contact the Department at (410) 537-3240
# Technical Guidance Document

## Reduction in Emissions of Sulfur Hexafluoride (SF₆)

### Table of Contents

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<th>General Information</th>
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<td>General Instructions</td>
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<td>Suggested Process</td>
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<tbody>
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<td>Project Sponsor Signature</td>
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<td>Project Sponsor Signature</td>
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</tbody>
</table>
GENERAL INSTRUCTIONS

The instructions for completing the offset project application are identified in the guidance document. It is necessary to read the entire guidance document to fully understand the requirements and instructions for completing the offset project application. In addition to the instructions below, the prospective Project Sponsor’s application should be organized and numbered in the same order as provided in the guidance document.

Print or type all information where requested.

Attach all requested information to the application. Ensure each attachment is identified properly.

- Submit hard copies of all attached documents. The Project Sponsor and Independent Verifier signatures must be originals.

- Submit electronic copies of all attached documents on a CD or DVD. Ensure that all Microsoft Excel spreadsheets are non-encrypted and accessible by the Department. Spreadsheets and calculations in the .pdf format will not be accepted.

Upload all requested information to COATS. See www.rggi.org for instructions.

SUGGESTED PROCESS

The following is the Department’s suggested process for applicants:


2. Complete the Consistency Application and Independent Verifier Report. Provide both hard copies and electronic copies of all documents.

3. Upload all requested information into COATS. This information will not be made publicly available until the Department determines the application’s completeness.

4. The Department will make a completeness determination within 30 days of receipt of the application, at which point the offset project information uploaded to COATS will be made publicly available.

5. The Department will make a consistency determination within 60 days after the completeness determination.


7. Allowances will be awarded at the discretion of the Department after approval of the Monitoring and Verification Report.

REDUCTION IN EMISSIONS OF SULFUR HEXAFLUORIDE (SF₆) OFFSET PROJECT
SECTION I – CONSISTENCY APPLICATION

For all fields where information must be provided, print or type all required information.

COATS OFFSET PROJECT NAME

- Provide the COATS offset project name, which is the same as the RGGI COATS General Account Name. The RGGI COATS general account is the RGGI COATS account into which any awarded CO₂ offset allowances related to the offset project will be transferred. Complete this field on every page of the offset project application.

COATS OFFSET PROJECT I.D. CODE

- Provide the COATS offset project I.D. code, which is the alphanumeric code automatically generated when the Project Sponsor makes the initial entry of the offset project in the RGGI CO₂ Allowance Tracking System (RGGI COATS). See the RGGI COATS User’s Guide at http://www.rggicoats.org for information about creating an offset project record. Complete this field on every page of the offset project application.

ELIGIBILITY REQUIREMENTS

Complete the Eligibility Requirements by indicating “Yes” or “No” to each requirement on the application. Indicating “Yes” to E.1 through E.5 or indicating “No” to E.6 through E.7 will deem the project ineligible.

- **E.1** – Check the “No” box if the offset project was initially commenced on or after December 20, 2005. Offset projects commenced before December 20, 2005 are not eligible for the award of CO₂ offset allowances.

- **E.2** – Check the “No” box if the offset project is not required by any local, state, or federal law, regulation or administrative or judicial order. Offset projects required by local, state, or federal law, regulation or administrative or judicial order are not eligible for the award of CO₂ offset allowances.

- **E.3** – Check the “No” box if the offset project does not include an electric generation component that is additionally being used for compliance with a renewable energy portfolio standard or other regulatory requirement. If the offset project includes an electric generation component, CO₂ offset allowances may not be awarded if the project is additionally being used for compliance with a renewable portfolio standard or other regulatory requirement.

- **E.4** – Check the “No” box if the offset project does not and will not receive funding or other incentives provided through the Strategic Energy Investment Fund. Offset projects are not eligible for the award of CO₂ offset allowances if funding or other incentives are received from the Strategic Energy Investment Fund or from any state fund resulting from the auction of CO₂ allowances.

- **E.5** – Check the “No” box if the offset project has not been awarded credits or allowances under any mandatory or voluntary greenhouse gas program. Offset projects that are awarded credits or allowances under mandatory or voluntary greenhouse gas programs are not eligible for the award of CO₂ offset allowances.

- **E.6** – Check the “Yes” box if the offset project consists of incremental actions beyond those taken during the baseline year to achieve a reduction in SF₆ emissions relative to the baseline year. Offset projects that do not consist of incremental actions to achieve a reduction in SF₆ emissions beyond those taken during the baseline year are not eligible for the award of CO₂ offset allowances.
• E.7 – Check the “Yes” box if the identified actions to be taken are consistent with the guidance provided in International Electrotechnical Commission (CEI/IEC), IEC TR 61634: High-voltage switchgear and control gear – Use and handling of sulfur hexafluoride (SF₆) in high-voltage switchgear and control gear. If the identified actions to be taken are not consistent with the guidance provided in E.6, the offset project is not eligible for the award of CO₂ offset allowances.

PROJECT SPONSOR INFORMATION

Print or type all required information pertaining to the Project Sponsor in the spaces provided.

• Organization Name and Project Sponsor Name: Provide the full legal name of the organization the Project Sponsor represents and the name of the Project Sponsor. If the Project Sponsor is representing him or herself, provide the name of the individual. The Project Sponsor is the person who is the Authorized Account Representative for the RGGI COATS general account.

• Street Address, City, State/Province, Postal Code, Country: In the appropriate areas, provide the full contact address of the organization the Project Sponsor represents.

• Telephone and Facsimile Transmission Number: Provide the primary contact telephone number and the facsimile transmission number for the Project Sponsor.

• E-Mail Address: Provide the primary contact E-mail address for the Project Sponsor.


• Offset Project Date of Commencement: Provide the date that the offset project initially commenced. 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.

POINT OF CONTACT INFORMATION

Print or type all required information pertaining to the Point of Contact in the spaces provided.

• Point of Contact Name: Provide the full legal name of the Point of Contact for the offset project.

• Street Address, City, State/Province, Postal Code, Country: In the appropriate areas, provide the full contact address for the Point of Contact for the offset project.

• Telephone and Facsimile Transmission Number: Provide the primary contact telephone number and the facsimile transmission number for the Point of Contact for the offset project.

• E-Mail Address: Provide the primary contact E-mail address for the Point of Contact for the offset project.
TRANSMISSION OR DISTRIBUTION ENTITY LOCATION

Print or type all required information pertaining to the Distribution Entity in the spaces provided.

- **Transmission or Distribution Entity Organization Legal Name:** Provide the full legal name of the organization claiming ownership of the transmission or distribution entity used in the offset project.

- **Physical Street Address, City, State/Province, Postal Code, Country:** In the appropriate areas, provide the complete physical address of the transmission or distribution entity used in the offset project.

ATTACHMENT NUMBER

Attach all of the following requested information with the application. Clearly indicate the corresponding attachment number (i.e.: I.1, I.2, etc.), the offset project name, and the offset project I.D. on all attached documents.

- **I.1** – Attach a detailed description of the actions to be taken as part of the offset project. Include an explanation of how the projected reduction or avoidance of atmospheric loading, or the sequestration of carbon is to be quantified, monitored, and verified.

- **I.2** – Attach documentation verifying that each of the Eligibility Requirements and the baseline emissions has been met.
  
  a. **E.1** – Provide records verifying that the offset project commenced between December 20, 2005 and December 31, 2008, or that the offset project commenced on or after January 1, 2009.

  b. **E.2** – Provide records to confirm that the offset project is not required pursuant to any local, state, or federal law, regulation, or administrative or judicial order.

  c. **E.3** – Provide records that verify that, if applicable, the electric generation component included in the offset project is not additionally being used for compliance with a renewable portfolio standard or other regulatory requirement.

  d. **E.4** – Provide records or statements that document the offset project has not and will not receive any funding or other incentives from the Strategic Energy Investment Fund (the Fund), incentives derived from the Fund, or any states’ fund receiving proceeds resulting from the auction of CO₂ allowances.

  e. **E.5** – Provide records or statements that the offset project has not and will not be awarded credits or allowances under any other greenhouse gas program.

  f. **E.6** – Provide documentation that describe the incremental actions to be taken as part of the offset project. The actions must be in one or more of the following three categories:

     i. Early retirement and replacement of electrical equipment

     ii. Repair/refurbishment of electrical equipment, including specific management practices to reduce equipment leakage of SF₆

     iii. Education and training to improve handling of SF₆, including cylinder handling and gas car operation and maintenance.

  g. **E.7** – Document how the incremental actions referenced in I.2(f) are consistent with the guidance provided in International Electrotechnical Commission (IEC) 1634, “High-voltage switchgear and control gear – Use and handling of sulfur hexafluoride (SF₆) in high-voltage switchgear and control gear” (CEI/IEC 1634, 1995-04), and
Electric Power Research Institute (EPRI), “Practical Guide to SF₆ Handling Practices” (TR-113933, 2002). All incremental actions must take place within the boundaries of the transmission and/or distribution entity.

h. Baseline Emissions – See Attachment Number I.3.

- I.3 – The emissions baseline will be determined in the Monitoring and Verification Report, as required by COMAR 26.09.03.04D.

- I.4 – Attach a statement and certification report signed by the project sponsor to document that the offset project is in compliance with all applicable requirements of COMAR 26.09.01 to .04 and the CO₂ Budget Trading Program in all participating states.

- I.5 – Attach a statement signed by the independent verifier to document that the monitoring and verification plan has adequately met all of the Department requirements.

- I.6 – Attach appropriate documentation if greenhouse gas emissions data related to the offset project have been or will be reported to any voluntary or mandatory programs, other than COMAR 26.09.01 to .04. For each program for which data have been or will be reported, provide the following:
  
  a. Program name
  b. Program type (voluntary or mandatory)
  c. Program contact information (website or street address)
  d. Categories of emissions data reported
  e. Frequency of reporting
  f. Commencement date of reporting
  g. Reporting status (prior, current, future)

Attach a statement in place of the above information if no greenhouse gas emissions data have been or will be reported to any voluntary or mandatory programs, other than COMAR 26.09.01 to .04.

- I.7 – If the offset project is located in a state or United States jurisdiction that is not a participating state, attach documentation that demonstrates that the Project Sponsor has complied with all requirements of the cooperating regulatory agency in the state or United States jurisdiction where the offset project is located.

- I.8 – If the SF₆ emissions rate is greater than the applicable emissions rate performance standard, attach documentation to demonstrate that the project is being implemented at a transmission and/or distribution entity serving a predominantly urban service territory and that at least two of the four criteria listed in b. through e. are met:
  
  a. **Predominantly Urban Service Territory:** Provide documentation that either greater than 50% of the entity’s SF₆ nameplate capacity is located in an urban area or greater than 50% of the electrical load served within the entity’s service territory is located in an urban area. An urban area is an area that has a population density of at least 1,000 people per square mile. Include the following documentation (include (i) and either (ii) or (iii)):

  i. Map to scale of the service territory delineating the specific geographic locations that have equal to or greater than 1,000 persons per square mile. Fore these geographic locations, list the names of the urban areas, their populations, and population densities; and

  ii. Documentation that greater than 50% of the entity’s SF₆ nameplate capacity is located in urban areas. Identify the manufacturer and model of the equipment, total SF₆ nameplate capacity, and equipment locations (e.g., name of substation) in urban areas. Total the nameplate capacity of SF₆-containing operating equipment that is located in urban areas. Divide that total by the total SF₆ nameplate capacity that was used to calculate the emissions rate. The result must be greater than 50%; or
iii. Documentation that greater than 50% of the entity’s electrical load served within its service territory is located in an urban area.

b. **Age of Equipment**: Provide documentation that the entity is comprised of transmission and distribution equipment that is older than the national average age of equipment. Identify the year of purchase or year of installation of each piece of installed transmission and distribution equipment that has an SF₆ nameplate capacity. Divide the SF₆ nameplate capacity of the equipment that is older than 30 years – the national average age of transmission and distribution equipment – by the total SF₆ nameplate capacity used to calculate the baseline entity-wide emissions rate. The result must be greater than 75% of the total SF₆ nameplate capacity.

c. **Poor Accessibility to Underground Equipment**: Provide documentation that a majority of the entity’s electricity load is served by equipment that is located underground. Identify the manufacturer and model of the SF₆-containing operating equipment located underground, of such equipment. Divide the total SF₆ nameplate capacity identified as being located underground by the total SF₆ nameplate capacity used to calculate the baseline entity-wide emissions rate. The result must demonstrate that greater than 50% of the entity’s SF₆ nameplate capacity is located underground.

Demonstrate that regular ongoing maintenance is precluded by the location of underground equipment. Describe how maintenance procedures, schedules, or costs differ for underground equipment compared to above-ground equipment in terms of the frequency, duration, cost, and/or other similar factors.

Retain supportive documentation for inspection by the Department and independent verifier, such as third-party audits, reports to regulators or other organizations responsible for system reliability, and written maintenance procedures, schedules, and/or other records.

d. **System Reliability**: Provide documentation of the inability to take a substantial portion of equipment out of service, as such activity would impair system reliability. Identify the manufacturer, model, and SF₆ nameplate capacity of each piece of SF₆-containing operating equipment in the entity’s service territory that, if taken out of service, would impair system reliability. Total the SF₆ nameplate capacity of this equipment. Divide that total by the total SF₆ nameplate capacity used to calculate the baseline entity-wide emissions rate. The result must demonstrate that greater than 33% of the entity’s SF₆ nameplate capacity is comprised of SF₆-containing operating equipment that would cause system reliability concerns if such equipment were taken out of service.

Retain supportive documentation for inspection by the Department and independent verifier, such as third-party audits, reports to regulators or other organizations responsible for system reliability, written equipment replacement procedures and schedules, and/or other records that substantiate that the SF₆-containing operating equipment cannot be taken out of service without impairing system reliability. Include as part of such supportive documentation entity-wide decommissioning records for the previous two years showing that similar equipment has not been taken out of service. An example of relevant data would be evidence that the entity or subset of the entity has a load factor of at least 80% resulting in insufficient capacity to cover the circuit outages resulting from equipment taken out of service.

e. **Inherently Leak-Prone Equipment**: Provide documentation that required equipment purpose or design for a substantial portion of entity equipment results in inherently leak-prone equipment. Identify the manufacturer, model, and SF₆ nameplate capacity of each piece of equipment that has a required purpose or design that results in it being inherently leak-prone. Inherently leak-prone equipment is SF₆-containing operating equipment with an average annual SF₆ leak rate of 10% or higher since its installation. If actual equipment leak data are unavailable, estimate the average annual leak rates for individual pieces of equipment based on the number of service calls required since the equipment’s installation and the amount of SF₆ leakage that typically triggers a service call (e.g., 10% loss of nameplate capacity). For example, a piece of equipment in service for three years that has required six service calls since its installation meets the definition of inherently leak-prone since its implied average annual leak rate of 20% (two service calls per years and assumed 10% loss of nameplate capacity per service call) is greater than the average annual leak rate of 10%.
Total the SF₆ nameplate capacity of the inherently leak-prone equipment. Divide that total by the total SF₆ nameplate capacity used to calculate the baseline entity-wide emissions rate. The result must demonstrate that greater than 33% of the nameplate capacity of SF₆-containing operating equipment is considered inherently leak-prone.

Retain supportive documentation for inspection by the Department and independent verifier, such as third-party audits, manufacturer or industry studies, reports to regulators or other organizations responsible for system reliability, or written equipment replacement data and schedules.

- **I.9** – Attach a description of the transmission or distribution entity in sufficient detail to specify the service territory served by the entity.
  
a. List and describe the assets and equipment used to transmit and distribute electricity to the electrical load of customers within the entity. All of the assets and equipment listed as part of the transmission and/or distribution entity must be located within the state of Maryland. The geographic area of the transmission and/or distribution entity may not span more than one state.
  
b. Describe the service territory of the electric transmission and/or distribution entity. List all geographic locations (e.g., countries, cities, towns) that the entity serves. Include a map to scale of the service territory representing authorized areas of service. The service territory described must be that specified by the Maryland Public Service Commission for which the entity has a regulatory obligation to serve electrical load.

- **I.10** – Attach documentation of the full legal name, address, email address, telephone number, and facsimile transmission number of both the owner and operator of the transmission or distribution entity.
  
a. Provide the organization legal name(s), point(s) of contact information, and physical address for both the owner and operator of the transmission and/or distribution entity.
  
b. Provide the owner and operator names and contact information as provided to the Maryland Public Service Commission. The owner is the legal entity that owns the transmission and/or distribution entity. The operator, which may or may not be identical to the owner, is the legal entity responsible for operating, controlling or supervising the transmission and/or distribution entity under a written contract with the owner of entity.
  
c. If the owner or operator of the transmission and/or distribution entity is a subsidiary of a corporate parent or holding company, provide the organization legal name(s), point(s) of contact information, and physical address for the parent company.

- **I.11** – Attach the Entity-wide SF₆ Inventory Tracking System (see instructions in the monitoring and verification plan in attachment I.12) for verification of tracking and accounting of all entity-wide uses of SF₆ in order to determine entity-wide emissions of SF₆ including all electric transmission and distribution assets and all SF₆-containing and SF₆-handling equipment owned or operated by the reporting entity. The attached inventory tracking system must be provided in spreadsheet form (or other appropriate database form).

- **I.12** – Attach a certified monitoring and verification plan, including an SF₆ inventory management and auditing protocol and a process for quality assurance and quality control of inventory data. Include:
  
a. **Data Sources and Calculations**: Document the data sources and calculations that will be used to determine baseline year SF₆ emissions and reporting year SF₆ emissions. Data sources and calculation must be consistent with those required pursuant to COMAR 26.09.03.04.
  
b. **SF₆ Inventory Management and Auditing Protocol**: Provide an SF₆ Inventory Management and Auditing Protocol, which must include the following:
i. **Description of the Entity-wide SF\(_6\) Inventory Tracking System:** Provide a detailed description of the Entity-wide SF\(_6\) Inventory Tracking System, including system maintenance, system back-up, system security features, report capacities, and a list of data fields. Provide a spreadsheet template (or other appropriate database template) of the Entity-wide SF\(_6\) Inventor Tracking System, which must contain the following:

1. Identification of the facility(ies) from which all SF\(_6\) gas is procured and disbursed
2. An entity-wide log of all SF\(_6\) gas procurements and disbursements
3. An entity-wide inventory of all SF\(_6\)-containing operating equipment and all other SF\(_6\)-related items, including cylinders, gas carts, and other SF\(_6\) storage containers

ii. **Personnel Contact Information:** Provide the following information for personnel responsible for maintaining the Entity-wide SF\(_6\) Inventory Tracking System:

1. An organizational structure of the “inventory management team,” which identifies the names and contact information for the personnel selected to oversee data entry into the Entity-wide SF\(_6\) Inventory Tracking System and into any distinct tracking system for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF\(_6\) Inventory Tracking System (include names of outside contractors that provide inventory management and/or data entry services; and

2. Names and contact information of the auditors of the Entity-wide SF\(_6\) Inventory Tracking System and any distinct tracking system(s) for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF\(_6\) Inventory Tracking System.

iii. **Inventory Tracking System Procedures and Training:** Document the following Entity-wide SF\(_6\) Inventory Tracking System procedures for data input, records keeping and records retention, and maintenance of cylinder logs:

1. Procedures for input of data into the Entity-wide SF\(_6\) Inventory Tracking System and any other distinct tracking system for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF\(_6\) Inventory Tracking System (e.g., data entry frequency; data fields requirements);

2. Procedures for records retention, including: purchase/sales records, supplier receipts of cylinders received from and returned to the supplier, recycling and destruction receipts, and records of newly installed SF\(_6\)-containing operating equipment and retired equipment;

3. Procedures for the maintenance of cylinder-specific logs, including maintenance of a master sheet identifying all cylinders using unique identifiers, and a standardized cylinder log form that includes:

   a. Location and specific identifying information of the equipment being filled with the SF\(_6\) gas from the cylinder;

   b. Location and specific identifying information of the equipment from which SF\(_6\) is being recovered and placed into the cylinder for transfer, reuse, recycling, reclamation, or destruction purposes, and

   c. Weight of the cylinder before and after: (1) the cylinder is connected to and disconnected from an automated gas top-off and filling system; or (2) any activity where gas is manually added to or removed from a cylinder. Note that estimating the weight of a cylinder using temperature and pressure to estimate SF\(_6\) disbursed from or added to a
cylinder is permitted for interim measurements of cylinder weight throughout the year. However, estimating cylinder weight using temperature and pressure is not allowed for determining beginning-of-year and end-of-year cylinder weight. Physical weighing of cylinders using a certified scale is the only acceptable method for calculating cylinder weight that will be used to determine inputs to the mass-balance formula.

i. Temperature and pressured based calculations are not considered reliable enough for determining inputs that will be used to calculate emissions. Temperature and pressure based calculations are limited by the gas law scope of their application.

4. Procedures for confirming that meters and scales are used for the filling and weighing of cylinders at each substation or other location designated for such activities and are consistently calibrated to manufacturer recommendations; and

5. An entity-wide training plan for the “inventory management team” on the use of the Entity-wide SF₆ Inventory Tracking System as a data source, the use of the SF₆ mass-balance method, and recordkeeping and record retention practices.

iv. **Auditing Procedures and Plans:** Document the following auditing procedures and plans:

   1. A schedule (i.e., calendar of date) for conducting audits
   2. Procedures for audits of inventory management, including all inventory tracking systems, data entry, and maintenance of cylinder logs in accordance with the monitoring and verification plan
   3. A template for a report on the findings of audits including identification of areas in need of corrective actions
   4. An entity-wide training plan for auditors on how to conduct the procedures for the audits

**c. Quality Assurance/Quality Control (QA/QC) Protocol:** Document the QA/QC process, which must include the following:

   i. **Contact Information and QA/QC Schedule:** Provide the following:

      1. Names and contact information for QA/QC officers in charge of administering the QA/QC process for inventory data; and

      2. A schedule establishing periodic (such as quarterly or semi-annually) QA/QC procedures for the inventory of:

         a. Entity-wide SF₆ gas procurements and disbursals

         b. All SF₆-containing operating equipment and all other SF₆ storage-related items, including cylinders, gas carts, and other SF₆ storage containers

         c. All cylinder logs

   ii. **QA/QC Procedures and Training:** Document the following QA/QC procedures and training plan:

      1. Procedures for entity-wide inventory of SF₆ gas procurements and disbursals, which include a review of at least 10% of the receipts for purchases/sales and disbursals kept at each substation (or other designated location) against entries in the Entity-wide SF₆ Inventory Tracking System to ensure accuracy and completeness in data entry.

      2. Procedures for entity-wide inventory of all operating equipment containing SF₆, which include a review of at least 10% of the records of newly installed and retired equipment and corresponding SF₆ nameplate capacity against entries in the Entity-wide SF₆ Inventory Tracking System to ensure accuracy and completeness in data entry.
3. Procedures for all cylinder logs, which include:
   
a. Confirmation in the form of certifications signed by inventory management team
   members that meters and scales are consistently calibrated to manufacturer
   recommendations for the filling and weighing of cylinders at each substation (or other
   designated location)

   b. Periodic review of the master sheet of cylinder logs to account for cylinder totals at each
   substation (or other designated location)

4. Procedures for the review of annual emissions calculations in order to:
   
a. Ensure complete compilation of data from all designated personnel of the inventory
   management team into the Entity-wide SF₆ Inventory Tracking System prior to
   calculation of emissions

   b. Identify unusually large changes to inventory, purchases/acquisitions, or sales/disbursals,
   and determine if the changes can be explained or if there is an error in reported inputs to
   the SF₆ mass balance method

   c. Ensure no negative inputs are entered and negative emissions are not calculated, except
   for changes in storage inventory and nameplate capacity, which may result in negative
   numbers

5. An entity-wide training plan for QA/QC officers addressing QA/QC procedures for Entity-wide
   SF₆ Inventory Tracking System data entry, use of the SF₆ mass-balance method, compilation and
   retention of associated sources of data, and recordkeeping practices to ensure consistent and
   complete inventory data.

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**PROJECT SPONSOR SIGNATURE**

Read and agree to the following by signing the Signature of Applicant.

An original signature is required for the following:

- Consistency Application Agreement
- Access Agreement Statement
- Statement of Truth, Accuracy, and Completeness
Check the Consistency Application box if the Independent Verifier Report is being submitted with the Consistency Application.

Check the Monitoring and Verification box if the Independent Verifier Report is being submitted with the Monitoring and Verification Report.

Print or type all required information in all required fields.

INDEPENDENT VERIFIER INFORMATION

Print or type all required information pertaining to the Independent Verifier in the spaces provided.

- **Independent Verifier Organization Legal Name**: Provide the full legal name of the organization the Independent Verifier represents.

- **Independent Verifier Point of Contact**: Provide the full name of the Independent Verifier.

- **Physical Street Address, City, State/Province, Postal Code, Country**: In the appropriate areas, provide the point of contact address of the Independent Verifier.

- **Telephone Number**: Provide the primary telephone number for the point of contact of the Independent Verifier.

- **E-Mail Address**: Provide the E-mail address for the point of contact of the Independent Verifier.

ATTACHMENT NUMBER

Attach the following requested information to the end of the application. Clearly indicate the corresponding attachment number (i.e.: II.1, II.2, etc.), the offset project name, and the offset project I.D. on all attached documents.

Attach II.1 and II.2 if the information is being submitted with the Consistency Application.

Attach II.3 if the information is being submitted with the Monitoring and Verification Report.

- **II.1 – Attach a verification report.**
  
  a. The verification report must document the following:

  i. The verifier has reviewed the entire Consistency Application and evaluated the contents of the application in relation to the applicable requirements of COMAR 26.09.03.02.

  ii. The verifier has evaluate the adequacy and validity of information supplied by the Project Sponsor to demonstrate that the offset project meets the applicable eligibility requirements of COMAR 26.09.03.02.
iii. The verifier has evaluated the adequacy and validity of information supplied by the Project Sponsor to demonstrate baseline emissions, pursuant to the applicable requirements of COMAR 26.09.03.04D.

iv. The verifier has evaluated the adequacy of the monitoring and verification plan submitted pursuant COMAR 26.09.03.04E.

b. The verification report must include the following contents:

   i. Cover page with report title and date
   ii. Table of contents
   iii. List of acronyms and abbreviations
   iv. Executive summary
   v. Description of objective of report
   vi. Identification of the client, including name, address, and other contact information
   vii. Identification of the offset project
   viii. Description of evaluation criteria (applicable regulatory provisions and documentation requirements specified in Consistency Application)
   ix. Description of the review and evaluation process, including any site visits and interviews
   x. Identification of individuals performing the verification work, including the verification team leader and key personnel, and contact information for the team leader
   xi. Description of the materials provided to the verifier by the Project Sponsor
   xii. Evaluation conclusions and findings, including level of assurance provided

- II.2 – Attach a certified entity-wide inventory of all SF₆-containing operating equipment and all SF₆-related items, including cylinders, gas carts, and other storage containers used by the entity.

- II.3 – Attach documentation of certification by the independent verifier of an annual monitoring and verification report that includes a certified current entity-wide inventory of all SF₆-containing operating equipment and all other SF₆-related items, including cylinders, gas carts, and other storage containers used by the entity.

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**INDEPENDENT VERIFIER SIGNATURE**

Read and agree to the following by signing the Signature of Independent Verifier.

An original signature is required for the following:

- Certification Statement
- Statement of Truth, Accuracy, and Completeness
For all fields where information must be provided, print or type all required information.

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PROJECT SPONSOR INFORMATION

Print or type all required information pertaining to the Project Sponsor in the spaces provided.

- **Organization Name and Project Sponsor Name**: Provide the full legal name of the organization the Project Sponsor represents and the name of the Project Sponsor. If the Project Sponsor is representing him or herself, provide the name of the individual. The Project Sponsor is the person who is the Authorized Account Representative for the RGGI COATS general account.

- **Street Address, City, State/Province, Postal Code, Country**: In the appropriate areas, provide the full contact address of the organization the Project Sponsor represents.

- **Telephone and Facsimile Transmission Number**: Provide the primary contact telephone number and the facsimile transmission number for the Project Sponsor.

- **E-Mail Address**: Provide the primary contact E-mail address for the Project Sponsor.


- **Offset Project Date of Commencement**: Provide the date that the offset project initially commenced. 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.

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POINT OF CONTACT INFORMATION

Print or type all required information pertaining to the Point of Contact in the spaces provided.

- **Point of Contact Name**: Provide the full legal name of the Point of Contact for the offset project.

- **Street Address, City, State/Province, Postal Code, Country**: In the appropriate areas, provide the full contact address for the Point of Contact for the offset project.

- **Telephone and Facsimile Transmission Number**: Provide the primary contact telephone number and the facsimile transmission number for the Point of Contact for the offset project.

- **E-Mail Address**: Provide the primary contact E-mail address for the Point of Contact for the offset project.
TRANSMISSION OR DISTRIBUTION ENTITY LOCATION

Print or type all required information pertaining to the Distribution Entity in the spaces provided.

- Transmission or Distribution Entity Organization Legal Name: Provide the full legal name of the organization claiming ownership of the transmission or distribution entity used in the offset project.

- Physical Street Address, City, State/Province, Postal Code, Country: In the appropriate areas, provide the complete physical address of the transmission or distribution entity used in the offset project.

ATTACHMENT NUMBER

Attach all of the following requested information to the end of the application. Indicate the corresponding attachment number (i.e.: III.1, III.2, etc.), the offset project name, and the offset project I.D. on all attached documents.

When submitting electronic copies of the following, ensure that all Microsoft Excel spreadsheets are non-encrypted and accessible by the Department. Files in the .pdf format will not be accepted.

- III.1 – Attach a statement that the monitoring and verification plan has adequately met all Department requirements.

- III.2 – Attach documentation of the full legal name, address, email address, telephone number, and facsimile transmission number of both the owner and operator of the transmission or distribution entity.
  
  a. Provide the organization legal name(s), point(s) of contact information, and physical address for both the owner and operator of the transmission and/or distribution entity.

  b. Provide the same owner and operator names and contact information as provided to the Maryland Public Service Commission. The owner is the legal entity that owns the transmission and/or distribution entity. The operator, which may or may not be identical to the owner, is the legal entity responsible for operating, controlling or supervising the transmission and/or distribution entity under a written contract with the owner of entity.

  c. If the owner or operator of the transmission and/or distribution entity is a subsidiary of a corporate parent or holding company, provide the organization legal name(s), point(s) of contact information, and physical address for the parent company.

- III.3 – Attach calculations showing how the emissions baseline was determined. The following information and documentation must be provided:

  a. Identify Baseline Year: Identify the designated baseline year. The baseline year must be the calendar year immediately preceding the calendar year in which the Consistency Application is filed.

  b. Enter SF₆ Values from the Entity-wide SF₆ Inventory Tracking System: Calculate the total entity-wide emissions of SF₆ for the baseline year using the following balance method. The SF₆ values must be derived from the submitted Entity-wide SF₆ Inventory Tracking System:

     i. SF₆ Emissions (lbs) = (SF₆ Change in Inventory) + (SF₆ Purchases and Acquisitions) – (SF₆ Sales and Disbursements) – (Change in Total SF₆ Nameplate Capacity of Equipment)

     ii. To calculate the SF₆ values requested, use the following equation that corresponds to the mass balance method described above:
## SF₆ Change in Inventory

### SF₆ Change in Inventory

Emissions (lbs) = (Vᵢᵇᵧ – Vᵢᵉᵧ) + (PAₛₚᵈ + PAₑ + PAᵦₑₑ) – (SDₒᵖ + SDᵣₑ + SD₃ₒᵈ + SDₛₒᵦ) – (CNPᵦₑ – CNPᵦₑₑ)

Where:

1. **SF₆ Change in Inventory** is the difference between the quantity of SF₆ gas in storage at the beginning of the reporting year (i.e., Vᵢᵇᵧ) and the quantity in storage at the end of the reporting year (i.e., Vᵢᵉᵧ). The term “quantity in storage” includes all SF₆ gas contained in cylinders (such as 115-pound storage cylinders), gas cards, and other storage containers. Quantity in storage does not include SF₆ gas contained in SF₆-using operating equipment. The change in storage inventory will be negative if the quantity of SF₆ gas in storage increases over the course of the year.

   a. **This portion of the equation is defined as follows:**

      i. Vᵢᵇᵧ = SF₆ inventory in cylinders, gas carts, and other storage containers (not SF₆-containing operating equipment) at the beginning of the reporting year

      1. The beginning-of-year inventory for a given year should always equal the end-of-year inventory for the previous year. Therefore, an end-of-year inventory measurement should be applied to the beginning-of-year inventory input for the following calendar year.

      ii. Vᵢᵉᵧ = SF₆ inventory in cylinders, gas carts, and other storage containers (not SF₆-containing operating equipment) at the end of the reporting year

   b. Determine change in inventory based on the quantities of SF₆ gas contained in each cylinder, storage container, and gas cart at both the start of the year and the end of the year. Total the start and end quantities for cylinders, as recorded in cylinder logs required by the SF₆ Inventory Management and Auditing Protocol (see instructions from I.12). Total the start and end quantities for gas carts and any other storage containers, as recorded in the Entity-wide SF₆ Inventory Tracking System. Combine totals to obtain the storage inventory total. Use quantities that represent the physical weights of the gas stored, not a calculated estimate based on temperature and pressure.

2. **Purchases and Acquisitions of SF₆** are the sum of all the SF₆ gas acquired from other parties during the reporting year, contained in storage containers or SF₆-using operating equipment. Acquisitions include SF₆ provided by equipment manufacturers with and inside equipment and SF₆ returned to the entity after off-site recycling.

   a. **This portion of the equation is defined as follows:**

      i. PAₛₚᵈ = SF₆ purchased from suppliers or distributors in cylinders
ii. \( PA_e \) = \( SF_6 \) provided by equipment manufacturers with or inside \( SF_6 \)-containing operating equipment
iii. \( PA_{re} \) = \( SF_6 \) returned to the reporting entity after off-site recycling

b. Sum the additions to the inventory during the year. Log each purchase and acquisition into the Entity-wide \( SF_6 \) Inventory Tracking System. Retain as documentation of data, for inspection by the Department and independent verifier, the corresponding purchase/acquisition records of \( SF_6 \) gas and \( SF_6 \) gas that accompanies \( SF_6 \)-containing equipment purchases, supplier receipts of cylinders, and receipts of recycled \( SF_6 \) returned to the entity after off-site recycling.

3. **Sales and Disbursements of \( SF_6 \)** are the sum of all the \( SF_6 \) gas sold or otherwise disbursed to other parties during the reporting year, contained in storage containers and \( SF_6 \)-using operating equipment. Disbursements include \( SF_6 \) returned to the supplier, \( SF_6 \) sent off-site for recycling, and \( SF_6 \) sent off-site for destruction.

   a. This portion of the equation is defined as follows:

   i. \( SD_{op} \) = Sales of \( SF_6 \) to other parties, including gas left in \( SF_6 \)-containing operating equipment that is sold
   ii. \( SD_{rs} \) = Returns of \( SF_6 \) to supplier (producer or distributor)
   iii. \( SD_{df} \) = \( SF_6 \) sent to destruction facilities
   iv. \( SD_{or} \) = \( SF_6 \) sent off-site for recycling

   b. Sum the subtractions from inventory, i.e., the sales and disbursements of \( SF_6 \) during the reporting year. Log each sale and disbursement into the Entity-wide \( SF_6 \) Inventory Tracking System. Retain as documentation of data, for inspection by the Department and independent verifier, the corresponding sales/disbursement records of \( SF_6 \) gas and \( SF_6 \) gas that is contained within equipment sold, supplier receipts of cylinders, and receipts of \( SF_6 \) sent off-site for recycling.

4. **Change in Total \( SF_6 \) Nameplate Capacity of Equipment** is the net change total nameplate capacity of \( SF_6 \)-containing operating equipment during the reporting year. The net change in nameplate capacity is equal to new equipment nameplate capacity minus retired equipment nameplate capacity. This quantity will be negative if the retired equipment has a total nameplate capacity larger than the total nameplate capacity of the new equipment. “Nameplate capacity” refers to the full and proper \( SF_6 \) charge of the equipment rather than to the actual charge, which may reflect leakage.

   a. This portion of the equation is defined as follows:

   i. \( CNP_{ne} \) = Total \( SF_6 \) nameplate capacity of new \( SF_6 \)-containing operating equipment at proper full charge
   ii. \( CNP_{re} \) = Total \( SF_6 \) nameplate capacity of retired or sold \( SF_6 \)-containing operating equipment at proper full charge

   b. Record the total \( SF_6 \) nameplate capacity of equipment at both the start of the reporting year and the end of the reporting year in the Entity-wide \( SF_6 \) Inventory Tracking System. Determine change in total \( SF_6 \) nameplate capacity of equipment based on the different between the two quantities. Retain as documentation of data, for inspection by the Department and independent verifier, records of newly installed equipment and records of retired equipment.
c. **Provide Inventory Documentation.** Attach the Entity-wide SF$_6$ Inventory Tracking System as documentation of reported SF$_6$ values and emissions calculations. This is the entity-wide tracking system specified in the Monitoring and Verification Plan (see instructions in I.12). The attached inventory tracking system must be provided in spreadsheet form (or other appropriate database form).

- **III.4** – Attach all emissions reductions calculations. Use the following formula:
  
  a. Emissions Reduction (tons CO$_2$e) = (Total Pounds of SF$_6$ Emissions in Baseline Reporting Year) – (Total Pounds of SF$_6$ Emissions in Reporting Year) x GWP / 2000
  
  b. Where:
  
     i. GWP = CO$_2$e global warming potential of SF (22,200)

- **III.5** – Attach documentation that identifies the facilities managed by the entity from which all SF$_6$ gas is procured and disbursed and documentation to support maintaining an entity-wide log of SF$_6$ gas procurements and dispersal. Include:
  
  a. The weight of each cylinder transported before shipment from the facility and the weight of each cylinder after return to the facility.
  
  b. A specific cylinder log for each cylinder that is used to fill equipment with SF$_6$, or reclaim SF$_6$ from equipment, which is retained with the cylinder.
  
  c. The location and specific identifying information of the equipment being filled, or from which SF$_6$ is reclaimed, and the weight of the cylinder before and after this activity.

- **III.6** – Attach a current entity-wide inventory of all SF$_6$-containing operating equipment and all other SF$_6$-related items, including cylinders, gas carts, and other storage containers used by the entity. Include:
  
  a. Identification of the facility(ies) from which all SF$_6$ gas is procured and disbursed
  
  b. An entity-wide log of all SF$_6$ gas procurements and disbursals
  
  c. An entity-wide inventory of all SF$_6$-containing operating equipment and all other SF$_6$-related items, including cylinders, gas carts, and other SF$_6$ storage containers.

- **III.7** – Attach updated documentation for the monitoring and verification plan, including:
  
  a. **Data Sources and Calculations:** Document the data sources and calculations that will be used to determine baseline year SF$_6$ emissions and reporting year SF$_6$ emissions. Data sources and calculation must be consistent with those required pursuant to COMAR 26.09.03.04.
  
  b. **SF$_6$ Inventory Management and Auditing Protocol:** Provide an SF$_6$ Inventory Management and Auditing Protocol, which must include the following:
     
     i. **Description of the Entity-wide SF$_6$ Inventory Tracking System:** Provide a detailed description of the Entity-wide SF$_6$ Inventory Tracking System, including system maintenance, system back-up, system security features, report capacities, and a list of data fields. Provide a spreadsheet template (or other appropriate database template) of the Entity-wide SF$_6$ Inventor Tacking System, which must contain the following:
        
        1. Identification of the facility(ies) from which all SF$_6$ gas is procured and disbursed
        2. An entity-wide log of all SF$_6$ gas procurements and disbursals
3. An entity-wide inventory of all SF₆-containing operating equipment and all other SF₆-related items, including cylinders, gas carts, and other SF₆ storage containers

ii. Personnel Contact Information: Provide the following information for personnel responsible for maintaining the Entity-wide SF₆ Inventory Tracking System:

1. An organizational structure of the “inventory management team,” which identifies the names and contact information for the personnel selected to oversee data entry into the Entity-wide SF₆ Inventory Tracking System and into any distinct tracking system for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF₆ Inventory Tracking System (include names of outside contractors that provide inventory management and/or data entry services; and

2. Names and contact information of the auditors of the Entity-wide SF₆ Inventory Tracking System and any distinct tracking system(s) for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF₆ Inventory Tracking System.

iii. Inventory Tracking System Procedures and Training: Document the following Entity-wide SF₆ Inventory Tracking System procedures for data input, records keeping and records retention, and maintenance of cylinder logs:

1. Procedures for input of data into the Entity-wide SF₆ Inventory Tracking System and any other distinct tracking system for a substation(s) or other designated location(s) that is used to provide data to the Entity-wide SF₆ Inventory Tracking System (e.g., data entry frequency; data fields requirements);

2. Procedures for records retention, including: purchase/sales records, supplier receipts of cylinders received from and returned to the supplier, recycling and destruction receipts, and records of newly installed SF₆-containing operating equipment and retired equipment;

3. Procedures for the maintenance of cylinder-specific logs, including maintenance of a master sheet identifying all cylinders using unique identifiers, and a standardized cylinder log form that includes:

   a. Location and specific identifying information of the equipment being filled with the SF₆ gas from the cylinder;

   b. Location and specific identifying information of the equipment from which SF₆ is being recovered and placed into the cylinder for transfer, reuse, recycling, reclamation, or destruction purposes, and

   c. Weight of the cylinder before and after: (1) the cylinder is connected to and disconnected from an automated gas top-off and filling system; or (2) any activity where gas is manually added to or removed from a cylinder. Note that estimated the weight of a cylinder using temperature and pressure to estimate SF₆ disbursed from or added to a cylinder is permitted for interim measurements of cylinder weight throughout the year. However, estimating cylinder weight using temperature and pressure is not allowed for determining beginning-of-year and end-of-year cylinder weight. Physical weighing of cylinders using a certified scale is the only acceptable method for calculating cylinder weight that will be used to determine inputs to the mass-balance formula.
i. Temperature and pressured based calculations are not considered reliable enough for determining inputs that will be used to calculate emissions. Temperature and pressure based calculations are limited by the gas law scope of their application.

4. Procedures for confirming that meters and scales are used for the filling and weighing of cylinders at each substation or other location designated for such activities and are consistently calibrated to manufacturer recommendations; and

5. An entity-wide training plan for the “inventory management team” on the use of the Entity-wide SF₆ Inventory Tracking System as a data source, the use of the SF₆ mass-balance method, and recordkeeping and record retention practices.

iv. Auditing Procedures and Plans: Document the following auditing procedures and plans:

1. A schedule (i.e., calendar of date) for conducting audits
2. Procedures for audits of inventory management, including all inventory tracking systems, data entry, and maintenance of cylinder logs in accordance with the monitoring and verification plan
3. A template for a report on the findings of audits including identification of areas in need of corrective actions
4. An entity-wide training plan for auditors on how to conduct the procedures for the audits

c. Quality Assurance/Quality Control (QA/QC) Protocol: Document the QA/QC process, which must include the following:

i. Contact Information and QA/QC Schedule: Provide the following:

1. Names and contact information for QA/QC officers in charge of administering the QA/QC process for inventory data; and
2. A schedule establishing periodic (such as quarterly or semi-annually) QA/QC procedures for the inventory of:
   a. Entity-wide SF₆ gas procurements and disbursals
   b. All SF₆-containing operating equipment and all other SF₆ storage-related items, including cylinders, gas carts, and other SF₆ storage containers
   c. All cylinder logs

ii. QA/QC Procedures and Training: Document the following QA/QC procedures and training plan:

1. Procedures for entity-wide inventory of SF₆ gas procurements and disbursals, which include a review of at least 10% of the receipts for purchases/sales and disbursals kept at each substation (or other designated location) against entries in the Entity-wide SF₆ Inventory Tracking System to ensure accuracy and completeness in data entry.
2. Procedures for entity-wide inventory of all operating equipment containing SF₆, which include a review of at least 10% of the records of newly installed and retired equipment and corresponding SF₆ nameplate capacity against entries in the Entity-wide SF₆ Inventory Tracking System to ensure accuracy and completeness in data entry.
3. Procedures for all cylinder logs, which include:
   a. Confirmation in the form of certifications signed by inventory management team members that meters and scales are consistently calibrated to manufacturer
recommendations for the filling and weighing of cylinders at each substation (or other designated location)

b. Periodic review of the master sheet of cylinder logs to account for cylinder totals at each substation (or other designated location)

4. Procedures for the review of annual emissions calculations in order to:

   a. Ensure complete compilation of data from all designated personnel of the inventory management team into the Entity-wide SF₆ Inventory Tracking System prior to calculation of emissions

   b. Identify unusually large changes to inventory, purchases/acquisitions, or sales/disbursals, and determine if the changes can be explained or if there is an error in reported inputs to the SF₆ mass balance method

   c. Ensure no negative inputs are entered and negative emissions are not calculated, except for changes in storage inventory and nameplate capacity, which may result in negative numbers

5. An entity-wide training plan for QA/QC officers addressing QA/QC procedures for Entity-wide SF₆ Inventory Tracking System data entry, use of the SF₆ mass-balance method, compilation and retention of associated sources of data, and recordkeeping practices to ensure consistent and complete inventory data.

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**PROJECT SPONSOR SIGNATURE**

**Read and agree to the following by signing the Signature of Project Sponsor.**

**An original signature is required for the following:**

- Statement of Truth, Accuracy, and Completeness.