

Confidentiality

All aggregated entity-level emissions data and metrics reported to the Registry will be available to the public. However, all reported emissions and activity data with a higher granularity (at facility, project, or source levels) and voluntarily reported to the Registry, will be kept confidential. In addition, all calculation methodologies and emission factors will remain confidential. Confidential information will only be accessible to the participant, the Registry, and the participant's chosen certifier, unless the participant allows others to access such information, or provides the Registry with written authorization making it available to the public.

Protocol Revision Process

From time to time, as new scientific and policy information becomes available, the Registry Board may choose to amend its Protocols. Stakeholders may also suggest changes based on their experiences using the Protocols. The following process will be used to adopt Protocol changes:

Any recommended changes should be submitted on the Registry's *Protocol Comment Form*. The form prompts stakeholders to describe:

- The issue or problem with the current Protocol.
- A proposed solution or suggested alternative approach to the issue.
- An explanation of how the proposed solution or alternative approach would continue to meet the general spirit and purpose of the Protocol and the Registry, as outlined in the Protocol itself, Registry policies, and enabling legislation.

Protocol Comment Forms are available on the Registry's website, www.climateregistry.org. Forms may be submitted at any time, and all comments received will be posted on the Registry's website for public review and response. A separate *Protocol Comment Response Form* will allow stakeholders to respond to others' comments about the Protocols.

Protocol Comment and Protocol Comment Response Forms received by the Registry more than 30 days prior to a Board meeting will be submitted to the Registry Board at its next meeting, along with a staff-prepared summary of comments and responses. The Board will discuss the suggested Protocol revisions, take public comment, and decide what changes, if any, will be made to the Protocol.

Any changes to the Protocol will be publicly announced to the Registry listserv, and any updated version(s) of the Protocol will be posted on the Registry website.

Reporting Data Collected Prior to Registry Participation

Some Registry participants may wish to report historical data, which is defined as emissions data prior to the year an organization first joins the Registry.

Historical data that is certifiable, consistent with the General Reporting Protocol guidelines, and conforms to CARROT reporting requirements, may be reported to the Registry after it is certified. The Registry encourages participants to report historical data where possible, believing that additional data, where consistent, increases the robustness and importance of the Registry.

However, there may be instances where a participant's data is certifiable, consistent with the spirit of Protocol guidelines, but reported differently than as outlined in the General Reporting Protocol or to allow input into the CARROT. For instance, a participant may have aggregate data for their direct and indirect emissions, but the data may not be broken down into the Protocol's four direct emission categories (stationary, mobile, process and fugitive emissions).

In this case, a participant can make a formal request for acceptance of the data to the Registry's Board. The written request must contain the following:

- A reason for the requested exception;
- A description of the data;
- An explanation as to why the data does not meet General Reporting Protocol guidelines; and
- A map of the participant's data and its relationship to the CARROT reporting requirements.

Requests for exceptions must be submitted in writing by email, fax, or post to the Registry's Associate Technical Director. The Registry will acknowledge requests and inform participants of the date of the Board meeting at which their request will be presented.

The Registry intends to maintain consistent and standardized reporting requirements for all participants. However, the Board may consider making exceptions when sufficient reasons exist. If an exception is granted, the Registry staff will work with the participant to accommodate and incorporate their reporting needs.

Contracting

The Registry intends to provide consistent and fair contracting practices with all of its consultants/contractors. While the Registry may choose to use a competitive bidding process to secure any or all of its contractors/consultants, it will use the following guidelines to ensure consistency when it secures contracted help:

- For projects that are valued at \$10,000 or less, the Registry may sole source the project to a consultant/contractor of its choice;
- For projects that are valued above \$10,000 and below \$75,000, the Registry may request targeted solicitations, and award the project to the best applicant;
- For projects that are valued above \$75,000, the Registry will follow a formal competitive bidding process.

Registry Participants/Certified Participants

California Climate Action Registry *Participants* include all organizations that have signed a Registry Statement of Intent (available on the website www.climateregistry.org or from the Registry office) to register their GHG emissions consistent with the Registry's Protocols and to pay their annual participation fees. Although there are no mandated timeframes for reporting emissions, organizations generally are expected to have completed certification of annual emissions within 12 months of the end of the calendar year being reported.

California Climate Action Registry *Certified Participants* are those participants that have successfully completed certification of at least one year of annual emissions data. The Registry will provide certified participants with a participation icon, available for use on their promotional or other materials.

Non-Certifiable Results

All participants must submit their annual GHG emissions to Registry-approved certifiers, who then submit certification opinions to the Registry. It is anticipated that the results of certification will be successful for all participants and that their annual GHG emissions will then be registered with the Registry. In the case where a certifier determines that a participant's emission results are non-certifiable, the certifier is expected to provide the participant with a clear description, in writing, of what is required to make the data certifiable. Once the issue has been corrected, a certifier must review the revisions made by the participant to ascertain if the annual report is now certifiable.

In some cases, corrections will not be possible because the necessary data and records do not exist. This is a higher possibility during the initial period of membership, as organizations develop systems and perfect their information reporting. Therefore, organizations that have non-certified emissions data during their first two years of participation are not required to submit a Certification Opinion to the Registry; however, they must submit a signed copy of a letter from a Registry-approved certifier indicating that the certifier was engaged by the participant to conduct certification activities.

Companies whose data are not certifiable during the first two years of their participation are encouraged to remain in the Registry and improve their data collection or reporting. All participants must submit Certification Opinions (whether certifiable or not) in their 3rd and all future years of participation in the Registry.

Dispute Resolution

In the event that there is a dispute between a certifier and a participant concerning material misstatements and the certifiability of Emission Reports, the following process shall be used to resolve the dispute:

The Registry participant and certifier shall notify the Registry of their inability to resolve differences regarding certifiability.

The Registry will select another of its approved certifiers that is acceptable to both parties. The selected company will meet with each of the parties, review the area of dispute, and reach a decision concerning certifiability. This decision shall be binding upon both certifier and participant. In the event that the decision is in favor of the certifier, the participant shall pay the costs associated with the dispute resolution; in the event that it favors the participant, the original certifier will be expected to pay the costs associated with the review of the disputed area.