From:
 GHG Regulator ENV:EX

 To:
 Grossmann, Meagen (RTA)

 Cc:
 GHG Regulator ENV:EX

Subject: RE: Reporting deadlines confirmed Date: May 27, 2020 9:57:00 AM

Attachments: GGIRCA Bulletin on GHG reporting deadline extension and SWRS update.msg

Hi Meagen:

Thank you for your email.

For the 2019 reporting period, emission reports will be due by July 31, 2020. Please see attached for a stakeholder notification regarding the GHG reporting deadline extension and Single Window Reporting System update. Thank you for flagging that the date on the website has not been updated yet.

CleanBC Industrial Incentive Program (CIIP) application timelines are still being determined, in light of changes to the federal emission reporting deadlines, and will be announced when finalized. Further details on the 2020 program will be released soon.

Please let us know if you have any further questions.

Sincerely,

CleanBC Industrial Incentive Program
The Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy

From: Grossmann, Meagen (RTA) < Meagen.Grossmann@riotinto.com>

Sent: May 25, 2020 2:05 PM

To: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

Subject: RE: Reporting deadlines confirmed

Can you please also confirm the CIIP will also be due on July 31?

Thanks meagen

From: Grossmann, Meagen (RTA)
Sent: Monday, May 25, 2020 8:36 AM

To: GHGRegulator@gov.bc.ca

Subject: Reporting deadlines confirmed

Hi there,

Can you please confirm that the reporting deadlines for the GHGBC and the GHGFederal reports are due July 31?

The webpage https://www2.gov.bc.ca/gov/content/environment/climate-change/industry/reporting still says due on May 31.

Sincerely,

Meagen Grossmann - BSc., ADGIS, B.I.T, Advisor Environment, Kitimat Aluminium

Rio Tinto

1 Smeltersite Road, PO Box 1800, Kitimat, BC, V8C 2H2, Canada

T: 250-639-8401 M: 250-407-2079 meagen.grossmann@riotinto.com

From: GHG Regulator ENV:EX []

To: GHG Regulator ENV:EX [GHGRegulator@gov.bc.ca]

Subject: GGIRCA Bulletin on GHG reporting deadline extension and SWRS update

Date: Thursday, April 23, 2020 16:46:53

Dear Stakeholder,

It is recognized that we are facing rapidly changing situations as we cope with the effects of COVID-19 in our province. In coordination with Environment and Climate Change Canada, the Director under the Greenhouse Gas Industrial Reporting and Control Act has determined an extension to the deadline for submitting emission reports is warranted. For the 2019 reporting period, emission reports will be due by July 31, 2020. Additionally, site visits as part of the verification process may now be conducted virtually. Please review GGIRCA Bulletin 005 and 006 for more information.

Please be advised that the Single Window Reporting System for the 2019 reporting cycle is now able to accept reports. Reports for previous years can always be submitted through the system year round.

Please note the following information prior to the submission of your emission reports:

A. Verification Statements

• □ □ □ □ □ □ Uploading a Verification Statement or Notice of Delayed Verification can be done through the "Report Verification" function at the "Reporting Dashboard", which does not require updating the GHG reports. Detailed instructions can be found in Chapter 7 of the Illustrated User Guidebook.
• • • • • • • • • • • • • • • • • • •
•□□□□□□□□ If a Delayed Verification was considered in the previous cycle, ensure that each Verification Statement is attached to its corresponding emission report. Combined verification statements for the two reporting cycles will not be accepted.
• □ □ □ □ □ □ □ If a verification statement or report shows an emission report contains material errors, omissions or is not quantified in accordance with the Regulation, the Operator may be required to submit a supplementary report which may require

re-verification. Operators should contact the Compliance Unit at GHGRegulator@gov.bc.ca for guidance. B. LFO Report corresponding LFO report is submitted as well. C. Facility List for Linear Facilities Operations • • • • A Facility List of facilities covered by a LFO report, and a Facility List covered by a L c report can be provided at the end of activity of "Oil and Gas Extraction and Processing" or "Natural Gas Transmission, Distribution or Storage". D. NAICS code • Reports should include the appropriate NAICS code(s) for the activities carried out. For oil and gas extraction activities, recent changes may require the use of the 211110 code as opposed to the 211113 code. E. The fuel list in the reporting system has been standardized. "Units" for custom fuels are attached to its name and its classification is added to align with the existing fuels. New fuels can be included, and will be standardized in future reporting years. Additional information on changes and updates to the Single Window Reporting System can be found in GGRICA Bulletin 007, located here. If you have any questions, please email GHGRegulator@gov.bc.ca Sincerely,

Industrial Reporting and Control Team

BC Ministry of Environment and Climate Change Strategy

Climate Action Secretariat,

From: GHG Regulator ENV:EX
Bcc: S.17

Page 06 of 97

Withheld pursuant to/removed as

s.17

Subject: Join Us for CleanBC Industry Program (CIIP) update on Jun 11th

Date: June 5, 2020 10:54:33 AM

Good morning,

We would like to invite you to our CIIP program update webinar.

CleanBC Industry Program (CIIP) update

Join us for a webinar on Jun 11, 2020 at 3:00 PM PDT.

Register now!

The CIIP update webinar will provide information about program details including timing of CIIP application and payment and product benchmarks. Participants will also be able to ask questions about other Program details.

After registering, you will receive a confirmation email containing information about joining the webinar.

View System Requirements

We look forward to connecting with you.

CleanBC Industrial Incentive Program

The Industrial Reporting and Control Team (IRC)

Climate Action Secretariat

BC Ministry of Environment and Climate Change Strategy

 From:
 Grossmann, Meagen (RTA)

 To:
 GHG Regulator ENV:EX

Subject: RE: [External] RE: FOR RESPONSE: FW: Registration for CIIP

Date: July 20, 2020 11:58:49 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Thanks for the follow up.

I will be able to test this and will get back to you,

Thanks

-Meagen

From: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

Sent: Monday, July 20, 2020 11:58 AM

To: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>; Grossmann, Meagen (RTA)

<Meagen.Grossmann@riotinto.com>

Subject: [External] RE: FOR RESPONSE: FW: Registration for CIIP

Hi Meagen,

Can you try re-registering from the start? I.e. please go to the CIIP homepage (https://ciip.gov.bc.ca/), click "Register", fill out the form and then try logging in again. We removed your profile from the system and hopefully creating a new clean registration will eliminate the glitch.

Please let us know if you continue to run into trouble.

Sincerely,

CleanBC Industrial Incentive Program
The Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy

From: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca>

Sent: July 17, 2020 3:17 PM

To: Meagen.Grossmann@riotinto.com

Cc: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca> **Subject:** RE: FOR RESPONSE: FW: Registration for CIIP

Hello Meagen,

Thank you for your e-mail.

Our technical team has informed me that it is likely an issue with browser cookies — would you be able to clear your browser cookies and completely close your bowser and then reset your password and try again? For example, if you are using Chrome, to clear cookies you would click on the three dots in the top right-hand corner of your browser, select "Settings" and then under the Privacy and Security menu select "Clear browsing data". Once done, close your browser (all windows) before resetting your password and trying again.

If this doesn't work, please submit a request to our technical team directly in the following manner:

• Click the "feedback" link at the bottom of the CIIP application page (or go to https://ciip-feedback.pathfinder.gov.bc.ca/)

```
Home Disclaimer Privacy Accessibility Copyright Contact Us Feedback
```

• Submit the error information along with the requested details, such as a description, the URL, what browser you are using, etc.

We apologize for any inconvenience. Please don't hesitate to let us know if the issue remains unresolved or if you have any further questions.

Sincerely,

CleanBC Industrial Incentive Program
The Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy

From: Grossmann, Meagen (RTA) < <u>Meagen.Grossmann@riotinto.com</u>>

Sent: July 16, 2020 4:03 PM

To: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca>

Subject: Registration for CIIP

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am trying to register for the CIIP on the CIIP page.

I get an error saying my user name and email is already registered, I tried to login but of course I don't know my password. I was able to reset my password but when I click on the link in my email it brings me to a page that says "you are already logged in" but when I go back to the CIIP main page it

asks to login, but I still don't know my password....

Sincerely,

Meagen Grossmann - BSc., ADGIS, B.I.T, Advisor Environment, Kitimat Aluminium

Rio Tinto

1 Smeltersite Road, PO Box 1800, Kitimat, BC, V8C 2H2, Canada

T: 250-639-8401 M: 250-407-2079 meagen.grossmann@riotinto.com From: GHG Regulator ENV:EX
To: Melissa.Winks@riotinto.com

Cc: frederic.picard@riotinto.com; Carolyn.chisholm@riotinto.com; david.gauthier4@riotinto.com;

gareth.manderson@riotinto.com; gabriel.emond@riotinto.com; gaby.poirier@riotinto.com; CSNR Finance

CleanBC FLNR:EX; GHG Regulator ENV:EX

Subject: CleanBC Industrial Incentive Program - Grant payment

Date: July 20, 2020 2:57:01 PM

Attachments: fin-312-direct-deposit-application.pdf

TP21JHQ9163.pdf

Hello Melissa.

Thank you for your interest in the CleanBC Industrial incentive Program (CIIP).

As described previously in a in a letter to your organization from Kevin Jardine, the Deputy Minister for the Ministry for Environment and Climate Change Strategy, the CIIP will be proceeding with a two-stage payment this year in order to be responsive to the needs of B.C.'s industrial stakeholders. Please find attached a grant letter outlining the initial payment for this year as well as a direct deposit form. This payment is based on an estimate of a facilities' fuel usage data from 2018 and is approximately 40 percent of a facilities' expected incentive payment this year. This payment will then be "topped up" in the fall upon receipt of your facilities' CIIP applications relating to 2019 data.

Please note that this payment is contingent on your submission of required greenhouse gas reports by July 31, 2020 and a completed CIIP application by August 31, 2020. Further terms related to the incentive payment are included in the attached letter.

If your operation applied to the CIIP last year, and your operation has identical banking information to previously submitted to the program, the form does not need to be re-submitted. Please simply confirm through email that your banking information is unchanged since last year's CIIP application. This confirmation must be sent to GHGRegulator@gov.bc.ca by July 31st, 2020 to ensure a timely receipt of the initial payment.

The direct deposit form must be completed if banking information has changed since the previous year's submission (or if no submission had occurred last year). The completed form must be sent to GHGRegulator@gov.bc.ca by July 31st, 2020 to ensure a timely receipt of the initial payment.

The initial payment can be expected within 6 to 8 weeks of the Climate Action Secretariat receiving a complete and accurate direct deposit form or confirmation of the previous year's banking information.

Corporate Services for Natural Resources (CSNR) is the agency responsible for processing payments and will contact you directly if there are any issues with your submitted direct deposit form. Please see below for some additional tips in filling out this form.

If you have any questions regarding your payment amount, please contact the Climate Action Secretariat at GHGRegulator@gov.bc.ca.

If you have any questions regarding filling out the direct deposit form, please contact CSNR at <u>CSNR.Finance.CleanBC@gov.bc.ca</u>.

Thanks for your time,

CleanBC Industrial Incentive Program
Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy

Agreement # TP21JHQ9163

Please review the following tips on filling out an accurate direct deposit form to help reduce payment processing time:

- Send to your company's financial department to assist you in filling out the form to reduce the potential for errors;
- Ensure that the legal entity name under "Company" in the grant letter is the name used on the Direct Deposit form in the "Registered Business Name/Corporation Name" field and is also the legal entity name registered to the business number (GST number) entered;
- The business number is the GST number rather than the BC Corporate Registry number;
- The email address provided on the direct deposit form is for the financial contact who will be reconciling your company's Accounts Receivable/Bank Accounts rather than the Operations Manager (unless they are the same);
- The void cheque provided must match the Legal Name on the direct deposit form;
- Part 4 of the direct deposit form must be signed by an authorized individual.



DIRECT DEPOSIT APPLICATION

General and Service Provider Suppliers

See instructions on Page 2 before completing.

Freedom of Information and Protection of Privacy Act (FOIPPA) – The personal information requested on this form is collected under the authority of the Financial Administration Act in compliance with the FOIPPA and will be used to process your Direct Deposit Application. The financial information contained below is protected under the provisions of the FOIPPA and will be used only for direct deposit by means of electronic funds transfer. For information about the collection use and disclosure practices write to the Director, Banking and Client Relations, Treasury Payments, Ministry of Finance, Provincial Treasury, PO Box 9414 Stn Prov Govt, Victoria, BC V8W 9V1.

CHECK (✓) ONE: ST	ART DIRECT D	DIRECT DEPOSIT CHANGE BANKING INFORMATION				IATION C	N CANCEL DIRECT DEPOSIT		
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INDIVIDUAL LAST NAME			ST NAME			MIDDLE NAMI	MIDDLE NAME		
REGISTERED BUSINESS NAME/ CO	DRPORATION NAME	SUF	SUPPLIER NUMBER (6 or 7 digits – if known)			wn) BUSINESS NU	BUSINESS NUMBER (9 digits)		
MAILING ADDRESS (include street or PO box, city, province and postal code)									
IS THIS A CHANGE OF ADDRESS?		EMAIL ADDRESS	(for delivery of a	n electronic	c paymen	t remittance)			
YES NO									
PART 2 – BANKING INFO	RMATION (Ca	nadian Finan	cial Institutio	ons Only	<i>'</i>)				
See Page 2 for additional instr	ructions.								
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ACCOUNT HOLDER NAME(S) (if diff	ferent from supplie	r name above)							
BANK NAME									
ADDRESS OF BANK (include street	ADDRESS OF BANK (include street or PO box, city, province and postal code)								
PART 3 – PROGRAM IDEN	NTIFICATION								
Check (✓) which payments yo	ou want direct de	eposited to the a	account specifie	ed above.					
ALL PROVINCE OF BC	PAYMENTS	ONL	Y PAYMENTS	FROM (enter d	letails below):			
MINISTRY ISSUING THE PAYMENT FILE NUMBER PROGRAM DESCRIPTION									
PART 4 – AUTHORIZATIO	N								
I/We, the undersigned are auth	orized to provide	the above infor	mation on beha	alf of the c	orporatio	on/individual(s) and	further authoriz	ze the	
Province of BC to make payme			e account until			_			
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MINISTRY CONTACT SIGNATURE (electronic signature accepted)				TREASURY PAYMENT SERVICES INFORMATION ADD DATE: YYYY / MM / DD INITIALS INITIALS				INITIALS	

COMMENTS:

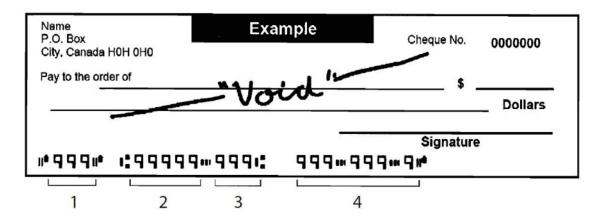
General Information

Complete this form if you want to start, change or cancel direct deposit payments from the Province of BC. Allow 6 to 8 weeks to process your application.

Part 2 – Banking Information

Direct deposit is only available for Canadian funds to Canadian financial institutions.

Complete Part 2 of this form with your bank account information. Attach a copy of an original voided personalized cheque, encoded deposit slip or other supporting documentation from your financial institution that confirms your account information. If supporting documentation is not available, your bank can verify the information by stamping the application form.



- Cheque number not required
- 2. Transit (branch) number 5 digits
- 3. Bank (institution) number 3 digits
- 4. Bank account number as shown on your cheque

Do not close your bank account prior to confirming that the direct deposit service information has been updated for Province of BC payments. Closing the account prior to updating the account information may result in the payment being delayed.

If the payment cannot be deposited to the banking information on file, a cheque will be issued and mailed to the address on file.

Continued on Page 3.

FIN 312/WEB Rev. 2018 / 10 / 05 Page 2

Sending in Your Application

To avoid delays in processing it is important to send your completed application form and supporting documentation with your next request for payment or invoice to the ministry program issuing your payments.

Follow the instructions provided by the ministry contact or check the ministry program's website for information.

Alternatively, applications can be mailed to:

Ministry	Mailing Address
Ministry of Children & Family Development (For Medical Benefits)	Medical Benefits PO Box 9763 Stn Prov Govt Victoria BC V8W 9S5
Ministry of Children & Family Development (For Autism Funding)	Specialized Provincial Services PO Box 9776 Stn Prov Govt Victoria, BC V8W 9S5
Ministry of Children & Family Development (For Affordable Child Care Benefit)	Child Care Service Centre PO Box 9953 Stn Prov Govt Victoria BC V8W 9R3
Ministry of Children & Family Development (For Child Care Operating Funding)	Child Care Operating Funding PO Box 9965 Stn Prov Govt Victoria BC V8W 9R4
Ministry of Children & Family Development (For multiple MCFD programs, or if you are unsure of your applicable program)	Accounting Operations – XDA PO Box 9769 Stn Prov Govt Victoria, BC V8W 9S5
Ministry of Social Development & Poverty Reduction	Financial Services – Victoria PO Box 9950 Stn Prov Govt Victoria, BC V8W 9R3
Ministry of Forests, Lands, Natural Resource Operations & Rural Development (For Rural Development; Agriculture; Environment; Energy Mines & Petroleum Resources; Indigenous Relations & Reconciliation)	CSNR Financial Operations PO Box 9356 Stn Prov Govt Victoria, BC V8W 9M2
Ministry of Finance (For all other ministries – application will be redirected to the ministry issuing payment to the supplier/service provider)	Treasury Payment Services PO Box 9414 Stn Prov Govt Victoria, BC V8W 9V1

FIN 312/WEB Rev. 2018 / 10 / 05 Page 3



July 20, 2020 Agreement #: TP21JHQ9163

Melissa Winks Business Partner HSE Rio Tinto Alcan Inc 1 SMELTERSITE RD KITIMAT, BC V8C 2H2

Dear Melissa,

The Ministry of Environment and Climate Change Strategy (the "Province", "we", "us", or "our" as applicable) – Climate Action Secretariat will provide Rio Tinto Alcan Inc (the "Recipient", "you", or "your" as applicable) an incentive payment as part of the CleanBC Industrial Incentive Program (CIIP) application for the 2019/20 fiscal year. \$.17

s.17

Please note that this funding is contingent upon:

- The operator of the reporting operation (as defined by the Greenhouse Gas Emissions Reporting Regulation) submitting its 2019 emissions report no later than July 31, 2020;
- the operator of the reporting operation submitting its 2019 reporting year CIIP application no later than August 31, 2020; and,
- for operations that have any products whose emissions intensity is greater than the sum of the product's benchmark level and three quarters of the difference between the product's benchmark and threshold levels, (i.e. an emissions intensity level that would receive an incentive lower than 75% of incremental tax paid), the operator of the operation submitting its CIIP emissions reduction plan in the prescribed manner to GHGRegulator@gov.bc.ca no later than December 31, 2020.

Please note that information within your CIIP application must follow the requirements listed in the Greenhouse Gas Industrial Reporting and Control Act, the Greenhouse Gas Emissions Reporting Regulation, and any additional CIIP requirements including those found in sector-specific guidance documents.

Ministry of Environment & Climate Change Strategy

Climate Action Secretariat

Mailing Address: PO Box 9339 Stn Prov Govt Victoria BC V8W 9M1 Telephone: 778-698-4034 Facsimile: 250-356-7528

Website: www.gov.bc.ca/env

The amount above will be payable to the Recipient within 6 to 8 weeks of the Climate Action Secretariat receiving back either a) written confirmation that the Direct Deposit information provided for the 2019/20 fiscal year remains correct, or b) a completed Direct Deposit Form attached to this Grant Agreement.

Payment cannot be made unless the Recipient named above is the name stated on the Direct Deposit form in the "Registered Business Name/Corporation Name" field and is also the name registered to the business number (GST number) entered. Please send your completed form back to GHGRegulator@gov.bc.ca as soon as possible and no later than July 31, 2020, to ensure a timely receipt of payment.

Please contact us at GHGRegulator@gov.bc.ca if you have any questions about the payment amount and CSNR.Finance.CleanBC@gov.bc.ca for any questions about filling out the Direct Deposit Form.

Under this Grant Agreement any funds provided by the Province to the Recipient which are determined to either be inconsistent with the CleanBC Industrial Incentive Programs' rules or not supported by evidence related to fuel usage and tax paid may be subject to repayment either through submission of payment to the Minister of Finance or deducted from the second incentive payment under this Grant Agreement or a following year's incentive payment.

We thank you for participating in the CleanBC Industrial Incentive Program and encourage you to contact us for any assistance you may require.

Yours truly,

Jeremy Hewitt

Assistant Deputy Minister

Grossmann, Meagen (ETA)
GHG Regulator ENV:EX
RE: [External] RE: FOR RESPONSE: FW: Registration for CIIP
July 22, 2020 10:23:24 AM
image001.png
image002.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe

I was able to now login



From: Grossmann, Meagen (RTA) Sent: Wednesday, July 22, 2020 9:17 AM To: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca> Subject: RE: [External] RE: FOR RESPONSE: FW: Registration for CIIP

I tried to register and this is the error I receive:

s.17

From: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca>

Sent: Monday, July 20, 2020 11:58 AM

 $\textbf{To:} \ \mathsf{GHG} \ \mathsf{Regulator} \ \mathsf{ENV:EX} < \underline{\mathsf{GHGRegulator@gov.bc.ca}} > ; \ \mathsf{Grossmann}, \ \mathsf{Meagen}. \ \mathsf{(RTA)} < \underline{\mathsf{Meagen.Grossmann@riotinto.com}} > \mathsf{Meagen.Grossmann} = \mathsf{Meagen.Grossma$

Subject: [External] RE: FOR RESPONSE: FW: Registration for CIIP

Can you try re-registering from the start? I.e. please go to the CIIP homepage (https://ciip.gov.bc.ca/), click "Register", fill out the form and then try logging in again. We removed your profile from the system and hopefully creating a new clean registration will eliminate the glitch.

Please let us know if you continue to run into trouble

CleanBC Industrial Incentive Program The Industrial Reporting and Control Team (IRC) Climate Action Secretariat

BC Ministry of Environment and Climate Change Strategy

From: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca> Sent: July 17, 2020 3:17 PM

To: Meagen.Grossmann@riotinto.com Cc: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca>

Subject: RE: FOR RESPONSE: FW: Registration for CIIP

Thank you for your e-mail.

Our technical team has informed me that it is likely an issue with browser cookies – would you be able to clear your browser cookies and completely close your bowser and then reset your password and try again? For example, if you are using Chrome, to clear cookies you would click on the three dots in the top right-hand corner of your browser, select "Settings" and then under the Privacy and Security menu select "Clear browsing data". Once done, close your browser (all windows) before resetting your password and trying again.

If this doesn't work, please submit a request to our technical team directly in the following manner:

. Click the "feedback" link at the bottom of the CIIP application page (or go to https://ciip-feedback.pathfinder.gov.bc.ca/)

Home Disclaimer Privacy Accessibility Copyright Contact Us Feedback

Submit the error information along with the requested details, such as a description, the URL, what browser you are using, etc.

We apologize for any inconvenience. Please don't hesitate to let us know if the issue remains unresolved or if you have any further questions.

Sincerely,

CleanBC Industrial Incentive Program The Industrial Reporting and Control Team (IRC) Climate Action Secretariat BC Ministry of Environment and Climate Change Strategy

From: Grossmann, Meagen (RTA) < Meagen. Grossmann@riotinto.com>

Sent: July 16, 2020 4:03 PM

To: GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca>

Subject: Registration for CIIP

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am trying to register for the CIIP on the CIIP page.

I get an error saying my user name and email is already registered, I tried to login but of course I don't know my password. I was able to reset my password but when I click on the link in my email it brings me to a page that says "you are already logged in" but when I go back to the CIIP main page it asks to login, but I still don't know my password....

Meagen Grossmann - BSc., ADGIS, B.I.T, Advisor Environment, Kitimat Aluminium

Rio Tinto 1 Smeltersite Road, PO Box 1800, Kitimat, BC, V8C 2H2, Canada

T: 250-639-8401 M: 250-407-2079 meagen.grossmann@riotinto.com



Page 21 of 97

Withheld pursuant to/removed as

s.17

From: BCCAS

To: GHG Regulator ENV:EX

Subject: CIIP Organisation Access Request Date: July 22, 2020 10:38:31 AM

Province of British Columbia

Clean BC Industrial Incentive Program

Meagen Grossmann has requested access to the application for Rio Tinto Alcan Inc.

An administrator can now <u>review and approve them</u> as an authorized representative for that Operator.

Sent on behalf of the Climate Action Secretariat & the CleanBC Industrial Incentive Program

 From:
 Grossmann, Meagen (RTA)

 To:
 GHG Regulator ENV:EX

 Subject:
 CIIP Portal Inquiry

 Date:
 July 22, 2020 10:56:16 AM

Attachments: External CIIP Application Organisation Access Requested.msg

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi There,

I was able to login and request access but I am unaware who the moderator is, can you provide their contact information, so that I can follow up?

Thanks,
Sincerely,
Meagen Grossmann - BSc., ADGIS, B.I.T,
Advisor Environment, Kitimat

Rio Tinto

Aluminium

1 Smeltersite Road, PO Box 1800, Kitimat, BC, V8C 2H2, Canada

T: 250-639-8401 M: 250-407-2079 meagen.grossmann@riotinto.com

From: BCCAS [no-reply.cas@gov.bc.ca]

To: Grossmann, Meagen (RTA) [Meagen.Grossmann@riotinto.com]
Subject: [External] CIIP Application: Organisation Access Requested

Date: Wednesday, July 22, 2020 10:38:27

Province of British Columbia

Clean BC Industrial Incentive Program

Hello, Meagen Grossmann.

Thank you for registering for the CleanBC Industrial Incentive Program.

You have requested access to submit an application on behalf of Rio Tinto Alcan Inc.

Your request is being processed. Please be advised that if you are not listed as the Operation Representative for GHG reporting, confirmation that you are authorized to complete this application will be sought from that representative.

You will be notified once your request for access has been approved.

If you have any questions during the application process, please contact GHGRegulator@gov.bc.ca

Sent to: meagen.grossmann@riotinto.com

On behalf of the Climate Action Secretariat & the CleanBC Industrial Incentive Program

 From:
 Winks, Melissa (RTA)

 To:
 GHG Regulator ENV:EX

 Cc:
 Grossmann, Meagen (RTA)

Subject: RE: [External] Request: Approval of applicant for CleanBC Industrial Incentive Program

Date: July 27, 2020 10:12:59 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Meagen Grossman is approved to submit on behalf of Rio Tinto Alcan.

Regards Melissa

From: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

Sent: Thursday, July 23, 2020 5:36 PM

To: Manderson, Gareth (RTIO) <Gareth.Manderson@riotinto.com>; Poirier, Gaby (RTKC) <gaby.poirier@riotinto.com>; Winks, Melissa (RTA) <Melissa.Winks@riotinto.com>

Cc: GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

Subject: [External] Request: Approval of applicant for CleanBC Industrial Incentive Program

Hello All,

Please be advised that Meagen Grossmann wishes to complete an application for the CleanBC Industrial Incentive Program (CIIP) on behalf of Rio Tinto Alcan Inc.. Please confirm, within three business days, that they are authorized to complete the CIIP application and receive data from the emission reports of Rio Tinto Alcan Inc. submitted under the *Greenhouse Gas Industrial Reporting and Control Act*.

Sincerely,

CleanBC Industrial Incentive Program
The Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy

From: GHG Regulator ENV:EX

To: meagen.grossmann@riotinto.com

Cc: Melissa.Winks@riotinto.com; GHG Regulator ENV:EX

Subject: CIIP Application – Request for Additional Information

Date: October 8, 2020 3:00:23 PM

Attachments: CIIP Emissions Reduction Plan Template 2020 FINAL.docx

Hello,

This e-mail is regarding Rio Tinto Alcan Inc.'s application(s) to the Clean BC Industrial Incentive Program (CIIP).

Based on the initial review of your application(s), we require further clarification regarding some of the submitted information. To enable you to view and address our questions and edit your application(s), we will be sending you a 'change request' through the CIIP Online Application System. Once you receive an automated e-mail from the system notifying you that changes have been requested to your application(s), we kindly request that **within two weeks** of the notification you complete the following steps:

- 1. Log in into your CIIP account, view the ministry comments on the submitted application(s) and make any changes as necessary.
- 2. Please make and save any changes necessary, but do not resubmit the application.
- 3. Contact the CIIP team at GHGRegualtor@gov.bc.ca informing us that the application comments have been addressed (citing the application ID). At this point we will review the updated information and will let you know if we have any further questions or concerns, and if your application is ready to be re-submitted. Note that prior to re-submission, sign-off by the certifying official will be required.
- 4. Please ensure that as you make any changes to the CIIP application you also make any required corrections to emission reports submitted through the Single Window Reporting System, if applicable.

For your information, the table below shows the draft results of the initial review of your application. Note that this information is strictly an initial assessment provided for your convenience. The additional information we've requested may change the values below and they should not be considered a final assessment of the potential incentive amounts applicable for your operation(s). In addition, this assessment does not preclude us from reaching out with requests for further changes. Furthermore, the review of your CIIP application and/or approval of an incentive payment does not equate to a review for compliance with the *Greenhouse Gas Industrial Reporting and Control Act* (GGIRCA) and its regulations. If compliance issues are identified at any time, applications may be held for further review, potentially impacting the timing of payments and/or eligibility of the application. Any non-compliance with regulatory requirements will be addressed in accordance with the GGIRCA Compliance and Enforcement Policy and Procedure.

s.17; s.21

Lastly, if you choose to submit an ERP, please see the attached template. ERPs will be due by December 31, 2020.

Please note we may have additional questions or request additional changes to your application, including to the administrative information you've provided and will notify you as soon as possible if this is the case. Thank you for applying to the CleanBC Industrial Incentive Program this year.

If you have any questions or concerns, please contact us at GHGRegulator@gov.bc.ca.

Sincerely,

CleanBC Industrial Incentive Program
The Industrial Reporting and Control Team (IRC)
Climate Action Secretariat
BC Ministry of Environment and Climate Change Strategy
ES

CLEANBC PROGRAM FOR INDUSTRY: EMISSIONS REDUCTION PLAN

Instructions:

The CleanBC Program for Industry (Program) facilitates greenhouse gas emission (GHG) reductions while supporting industrial competitiveness. The program has two initiatives:

- CleanBC Industrial Incentive Program (CIIP) that reduces carbon-tax costs for industrial operations that meet world-leading emissions intensity benchmarks; and
- CleanBC Industry Fund (CIF) that supports industry investments to reduce emissions.

For the 2019 reporting year, facilities that apply to CIIP are guaranteed a minimum 75 percent return on the incremental carbon tax (i.e. amount over \$30/tonne) paid. Facilities that would receive less than 75 percent when assessed against a sector benchmark will receive 75 percent return if they submit an emissions reduction plan (ERP). The purpose of the ERP is for eligible facilities to conceptualize projects and/or activities to reduce GHG emissions within the facility boundary. This will help to prepare proponents for application under the CIF in future calls for proposals.

This template must be used for all ERP submissions.

All eligible facilities must choose one of the two options to outline plans:

- 75% emission intensity this plan will reduce emissions to a level which would otherwise permit a 75% incremental carbon tax return under CIIP
- 15 % reduction this plan will reduce emissions intensity by 15% percent under business as usual operations

All emissions reductions outlined by the projects/activities identified must be direct reductions to emissions reportable under GGIRCA.

Section 3 of this template requires the proponent to outline all projects/activities that are required to meet the plan objective chosen in Section 2. In Section 4, space is provided to detail the specifics of the two projects within the plan which may be implemented the most immediately (or one project if that is all that is required to meet the plan objective). However, mention of all projects needs to be provided in the Section 3 high-level summary.

The document should be provided as a 'searchable' PDF. All the response units in the document need to be in "tCO2e", "GJ", and "\$M".

Any questions should be directed to CleanBCIndustryFund@gov.bc.ca with "ERP Question" in the title.

1. Background Information:

CONTACT INFORMATION	
Legal Name of Operator of the Primary Reporting Operation	
Legal Name of Proponent	

Address and/or location of the Primary Reporting Operation				
BCGHGID of Primary Reporting Operation				
Contact Name				
Contact Title				
Contact E-mail				
2. Plan Objective:				
Select one of the following:				
75% Benchmark Intensity	☐ 15% Reduction t	o applicable Intensity		
Impact:				
a. Business as usual o	emission intensity (2019 or 17-2019):			
b. Projected emission intensity following ERP:				
	annual total emissions erage, 2017-2019):			
d. Projected annual t	total emissions following			
set in Section 2 (above). In		e.g. Diesel combus	tion from machir	emission reduction objective nery) and method for reducing vity identified.

B: High-level Timeline for Projects
Please provide an estimated start/completion date for each of the projects listed above.
. Projects:
A: The following information is required for the <u>first</u> project to start based on the timelines/project descriptions rovided in Section 3.
Project #1 Description
Describe the project in enough detail for reviewers to establish that the approach is reasonably achievable. Include a high-level description of the current process/technology and the new process/technology that will replace it through this project.
Technology Readiness Level (TRL) (Select one of the below)
TRL 7 - Prototype at planned operational level and is ready for demonstration in an operational environment. Activities include prototype field testing
TRL 8 - Technology has been proven to work in its final form and under expected conditions. Activities include developmental testing and evaluation of whether it will meet operational requirements.
TRL 9 - Actual application of the technology in its final form and under real-life conditions, such as those encountered in operational tests and evaluations. Activities include using the innovation under operational conditions.
Estimated Budget (±30%)

GHG Impacts
[Give an estimate of the reduction in Emission Intensity and/or Total Emissions]
Description of Potential Business Risks Due to the Project Implementation:
Financial or Business Case:
Provide a business case, including payback period for the implementation of this project. [Give a rough estimate of project savings due to the project (less carbon tax payment, less fuel use, improved operation
efficiency, etc.]
B: The following information is required for the <u>second</u> project to start based on the timelines/project descriptions rovided in Section 3. Project #2 Description
Describe the project in enough detail for reviewers to establish that the approach is reasonably achievable. Include a high-level description of the current process/technology and the new process/technology that will replace it through this project.
Technology Readiness Level (TRL) (Select one of the below)
TRL 7 - Prototype at planned operational level and is ready for demonstration in an operational environment. Activities include prototype field testing

 □ TRL 8 - Technology has been proven to work in its final form and under expected conditions. Activities include developmental testing and evaluation of whether it will meet operational requirements. □ TRL 9 - Actual application of the technology in its final form and under real-life conditions, such as those encountered in operational tests and evaluations. Activities include using the innovation under operational conditions. Estimated Budget (±30%)
GHG Impacts
[Give an estimate of the reduction in Emission Intensity and/or Total Emissions]
Description of Potential Business Risks Due to the Project Implementation:
Financial or Business Case:
Provide a business case, including payback period for the implementation of this project.
[Give a rough estimate of project savings due to the project (less carbon tax payment, less fuel use, improved operation efficiency, etc.]



CLEANBC INDUSTRIAL INCENTIVE PROGRAM

Application Process

July 16, 2020

AGENDA



- 1. Context and brief program overview
- 2. CIIP program in 2020
- 3. Overview of process and timeline
- 4. How to apply
 - Getting started
 - Application process demonstration

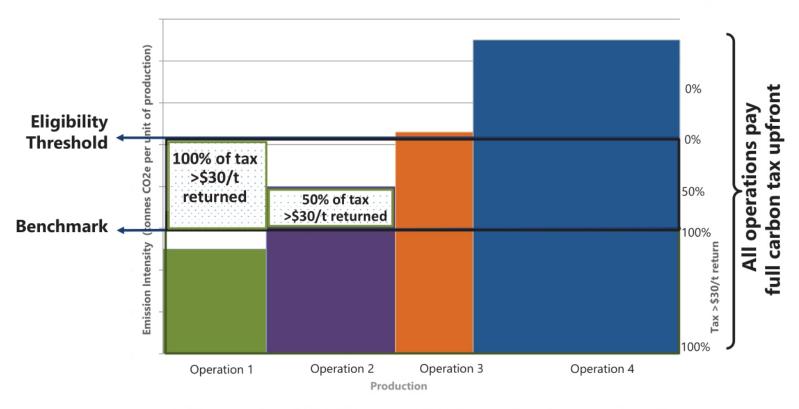
CLEANBC PROGRAM FOR INDUSTRY cleanBC

- Program Objectives: support the competitiveness of B.C. industrial facilities while facilitating GHG emission reductions
- Funded by incremental carbon tax (i.e. portion > \$30/tonne) paid by large industrial operators
- Open to operations with emissions > 10,000 tCO2e annually within eligible sectors
- 2 components:
 - CleanBC Industrial Incentive Program (CIIP)
 - CleanBC Industry Fund (CIF)



CIIP IN A NUTSHELL





Carbon tax is paid each year as fuel is produced or purchased. CIIP payments are provided in the following year based on program guidelines.



INCENTIVE PAYMENT FORMULA



- Product's incentive payment is calculated by multiplying the product's incremental carbon tax by the incentive ratio.
 - Incentive ratio how the product's emissions intensity compares with the benchmark and threshold.
- Benchmarks/thresholds can be found on the CIIP <u>webpage</u>. Confidential thresholds available upon request from facility contact.
- Payments for facilities with multiple products is the sum of their products' incentive payments. Facilities producing more than one product must allocate emissions among product (guidance provided).
- For 2019 reporting year, no additional verification requirements besides those in GGIRCA (i.e. production related information does not need to be verified).



CIIP IN 2020: TRANSITION+ YEAR



Incentive payment based on the **higher** of:

- a) The incentive ratio based on emissions intensity compared to benchmark and threshold; or,
- b) 75%*

^{*}Facilities receiving 75% incentive required to submit Emission Reduction Plan

Milestone	Date
CIIP initial payments	July/August 2020
CIIP application webinar	July 16, 2020
Single Window Reporting System (SWRS) Deadline	July 31, 2020
CIIP application deadline	August 31, 2020
CIIP second payment	November-December 2020
CIIP Emission Reduction Plan due (if applicable)	December 31, 2020



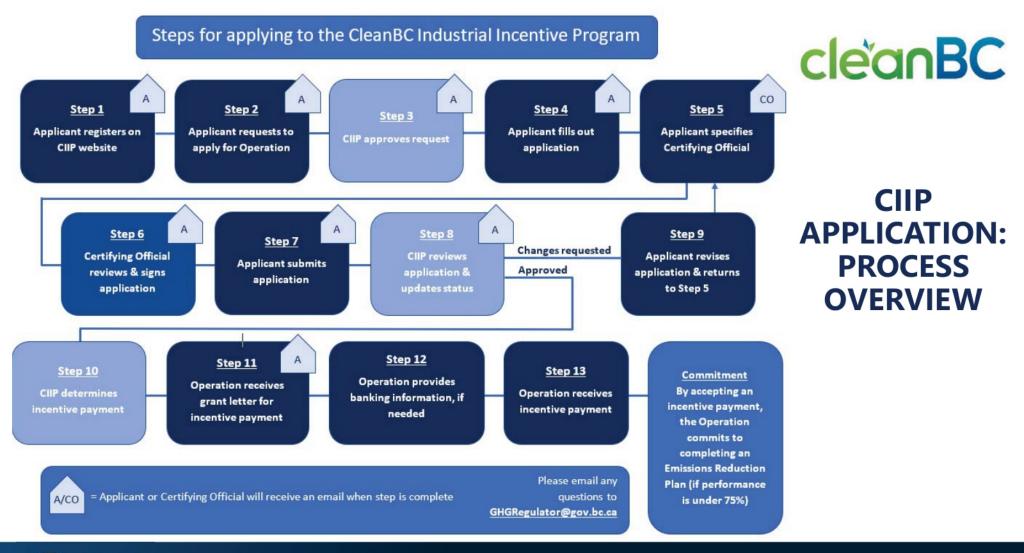
CIIP APPLICATION



(GREENHOUSE GAS INDUSTRIAL REPORTING AND CONTROL SYSTEM - GGIRCS)

- Process re-designed to reduce effort for reporters
 - o New software big improvement, but patience is requested
 - Province will assist reporters through process, as necessary
- CAS will provide sector-specific guidance documents and calculation tools for support
 - Available on the CIIP website (and via e-mail)
- Automatic upload of data from Single Window Reporting System to reduce amount of data entry and improve accuracy and consistency
 - Upload of data from SWRS takes time upload approx. once a week, tentatively expected July 30-31 & August 4-6
 - o Reporters to confirm uploaded data and enter production and other information
- Questions/issues: <u>GHGRegulator@gov.bc.ca</u>
 - Additional functionality within system exception paths/by-pass options (allow by-passing of tech problems) and ability to include comments or report a problem







CIIP APPLICATION: BEFORE YOU START CLEGOBC



Have completed your SWRS reporting Have following information ready:

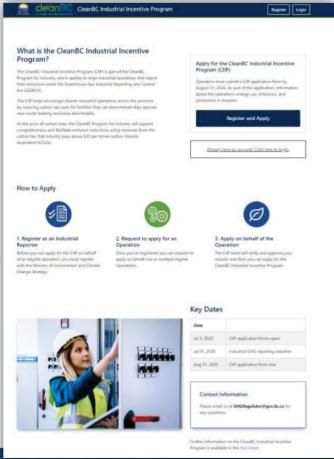
- SWRS report
- Operator, Operational Representative and Facility information
- BC Corporate Registry number (found at Orgbook)
- BC GHG ID, NAICS code, addresses, etc.
- Emissions, fuel use, electricity, heat and production information
- Certifying official (e-mail address)

CIIP.gov.bc.ca

Note: Do not use Internet Explorer



GETTING STARTED



Apply for the CleanBC Industrial Incentive Program (CIIP)

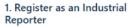
Operators must submit a CIIP application form by August 31, 2020. As part of the application, information about the operation's energy use, emissions, and production is required.

Register and Apply



How to Apply





Before you can apply for the CIIP on behalf of an eligible operation, you must register with the Ministry of Environment and Climate Change Strategy.



2. Request to apply for an Operation

Once you've registered you can request to apply on behalf one or multiple eligible Operations.



3. Apply on behalf of the Operation

The CIIP team will verify and approve your request and then you can apply for the CleanBC Industrial Incentive Program.

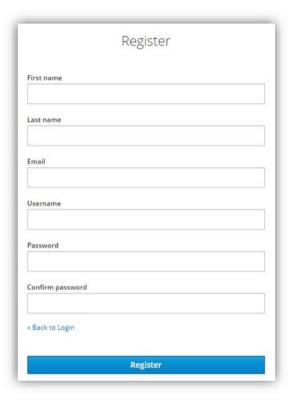
Key Dates

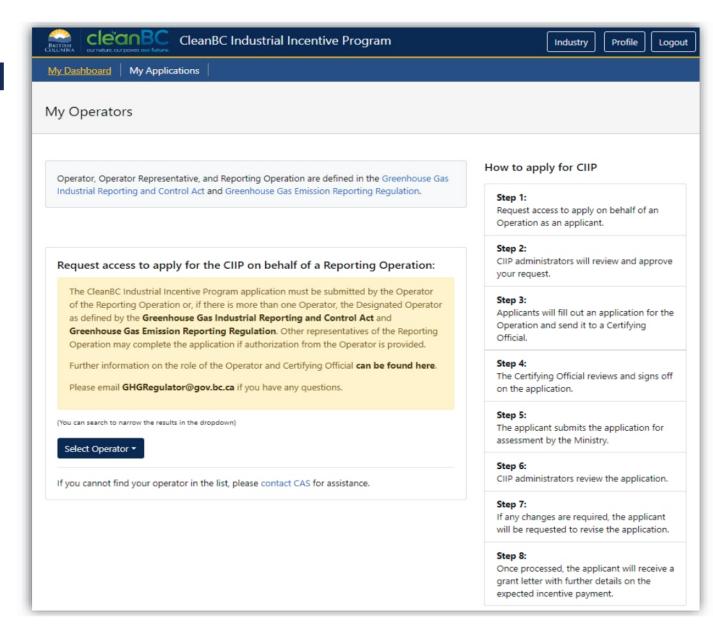
Date	
Jul 3, 2020	CIIP application forms open
Jul 31, 2020	Industrial GHG reporting deadline
Aug 31, 2020	CIIP application form due

CIIP.gov.bc.ca



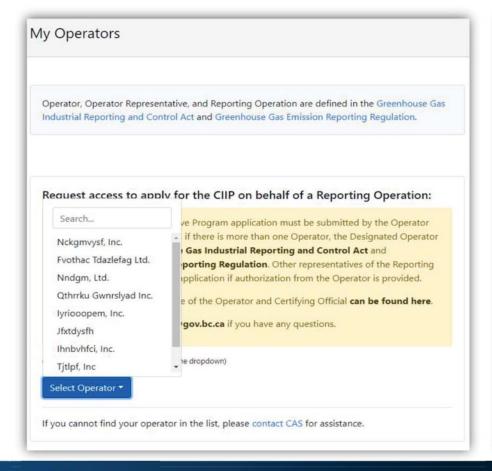
REGISTRATION AND ACCESS

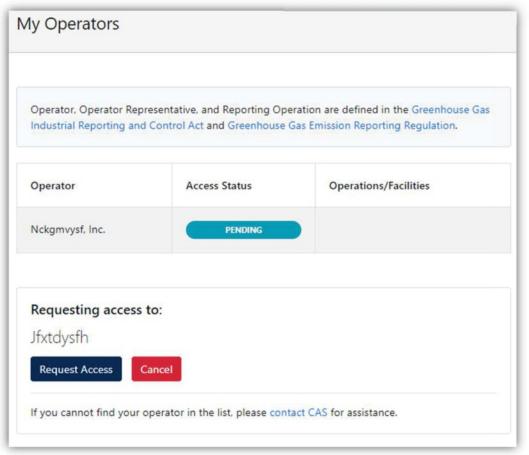




REGISTRATION AND ACCESS



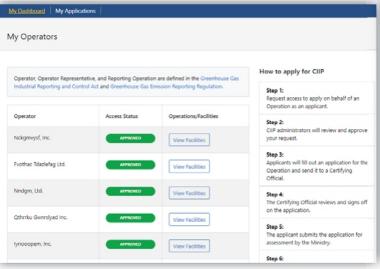




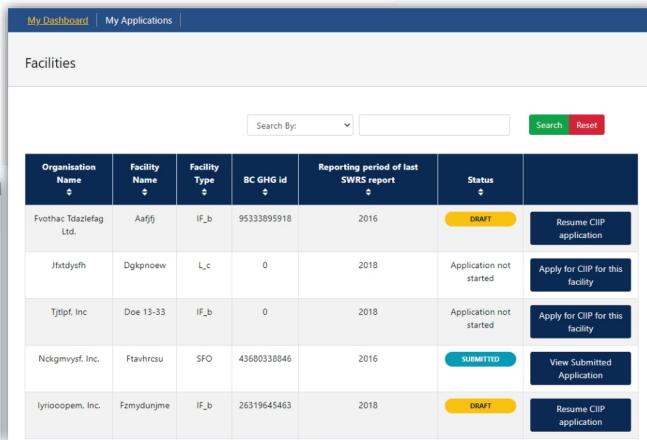


STARTING AN APPLICATION

- 'My Dashboard'
- · 'My Applications'
- Note that may take up to 10 business days for data from SWRS to come in





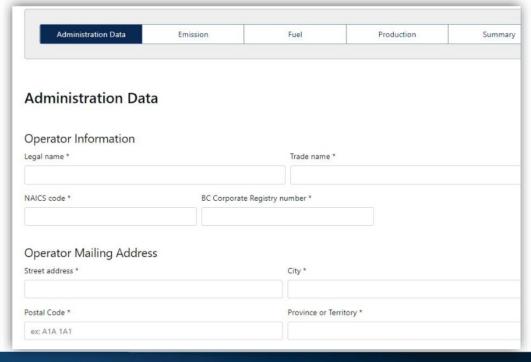


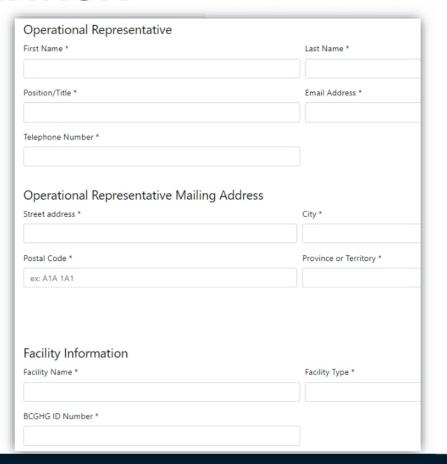


ADMINISTRATIVE INFORMATION



- Operator
- BC Corporate Registry number
- Facility

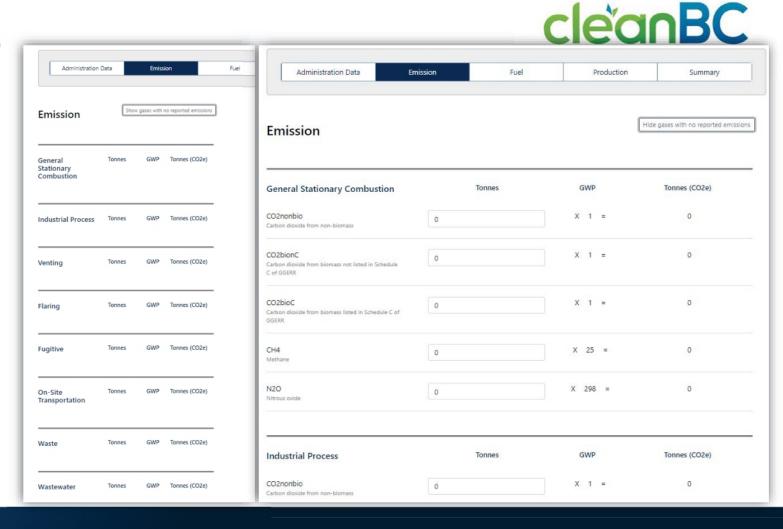






EMISSIONS

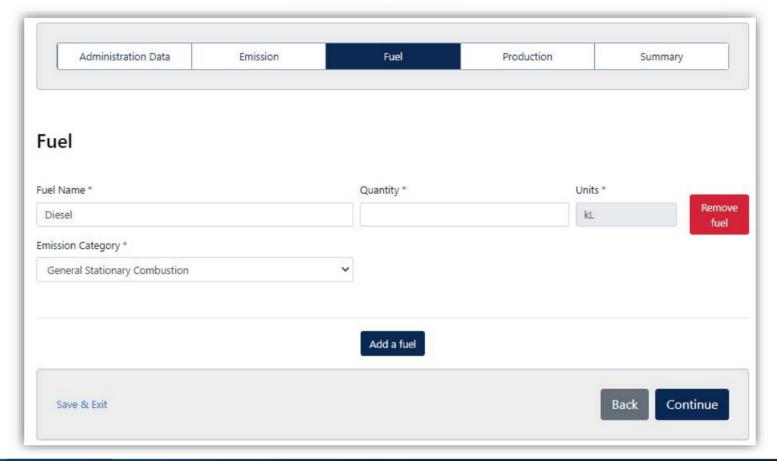
- Emissions should be automatically uploaded
- Disaggregated by type (as in SWRS)
 - General Stationary Combustion
 - Industrial processes
 - Venting
 - Flaring
 - Fugitive
 - On-Site
 Transportation
 - Waste
 - Wastewater





FUEL USE

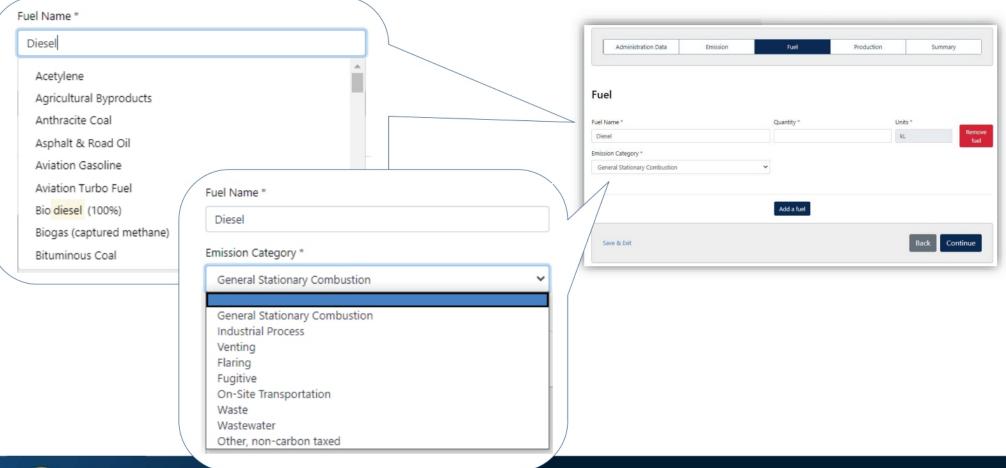






FUEL USE



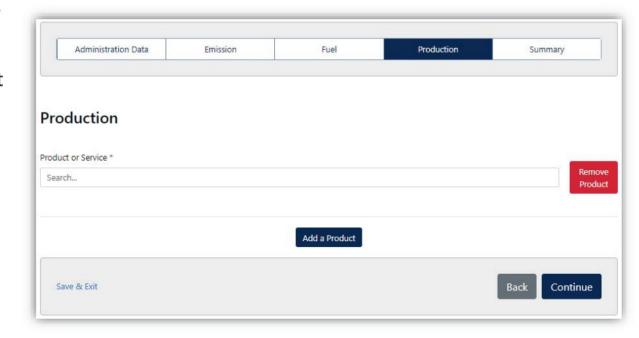


BRITISH COLUMBIA

PRODUCTION



- All products must be added for a facility
- In addition, purchased, generated, imported, sold electricity and heat must also be added as a "product"
- Be conscious of input units and convert where necessary
- See sector-specific guidance (incl. Excel calculators) for:
 - Entering production information
 - Calculating emissions
 - Emission allocation between products



Guidance documents: will be posted online at the CleanBC Industrial Incentive Program website or via email: GHGregulator@gov.bc.ca



PRODUCTION: PRODUCT LIST



Production

Product or Service *

Search...

Exported electricity

Exported heat

Purchased electricity

Purchased heat

Generated electricity

Generated heat

Emissions from EIOs

Aluminum Smelting

Cannabis (flowers and seedlings) grown under cover

Cement equivalent

Centrifugal Compression

Chemical Pulp

Copper equivalent (open pit)

Copper equivalent (underground)

Food (including seedlings) grown under cover

District energy (heat)

Gold equivalent

Forged steel balls (grinding media <3.5")

Forged steel balls (grinding media >4")

Gypsum wallboard

Lime

Hot dip galvanizing

Hydrogen Peroxide (H2O2)

Lead-Zinc Smelting

Sweet Gas Plants Sour Gas Plants

Sugar (liquid)

Sugar (solid)

Liquefied Natural Gas (LNG)

Lumber

Veneer

Wood Panels (Plywood, MDF, OSB)

Other Pulp (Mechanical pulp, paper, newsprint)

Wire draw production

Reciprocating Compression

Petroleum Refining

Wood pellets

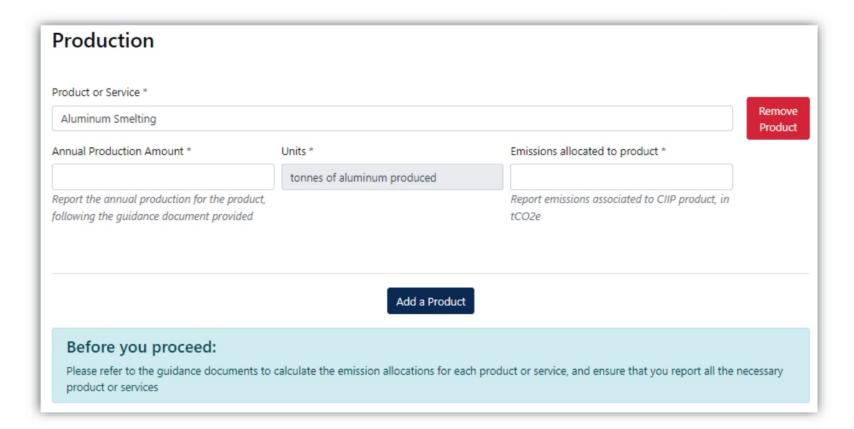
Wood chips

Waste rendering



PRODUCTION: EXAMPLE

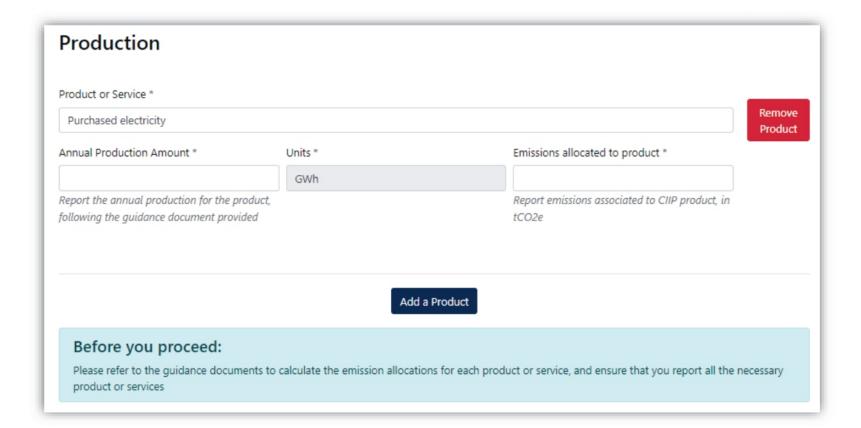






PRODUCTION: EXAMPLE - ELECTRICITY cleanBC







MULTI-PRODUCT FACILITIES



- Facilities producing more than one product required to allocate emissions among products.
- Emissions allocation is determined by processes listed in sector guidance documents
- Allocation for combined heat and power, as well as exported/sold energy, will be addressed through sector-specific guidance materials.

See sector-specific guidance (incl. Excel calculators with pre-set formulas): posted online

or via email: GHGregulator@gov.bc.ca



TREATMENT OF ELECTRICITY

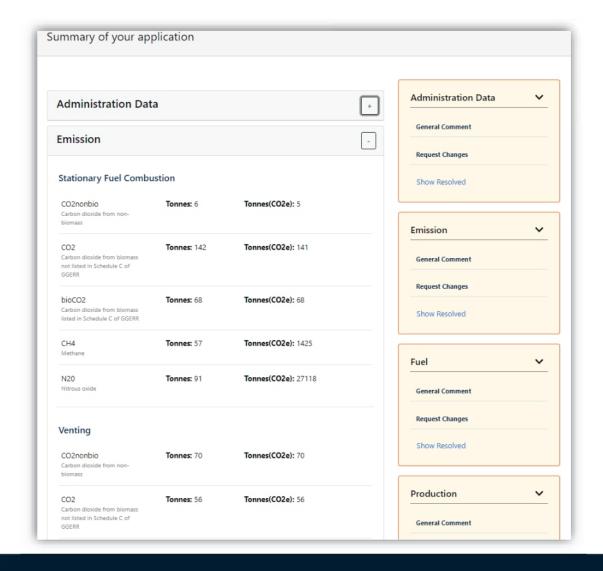


- Many sectors must also report the GHG emissions associated with purchased or imported grid electricity.
- Grid electricity emissions quantified by multiplying the published <u>electricity</u> <u>emission intensity factors</u> by the amount of purchased grid electricity $Q_{Purchased}^{Electr.}$ in GWh. Imported electricity emission factor as cited in purchase agreement
- For some sectors, (pulp and paper, gypsum, chemicals, cement, lime) emissions from purchased electricity emissions are excluded
- Electricity that is produced as a by-product and sold to the grid will have 75% of incremental carbon tax emissions reimbursed



APPLICATION REVIEW

 Comments or reporting challenges can be flagged to CAS reviewers





CERTIFICATION



Once application completed and reviewed by applicant Step 6 Step 5 Step 7 **Certifying Official** Applicant specifies **Applicant submits** reviews & signs **Certifying Official** application application Application Certification Note: If application is changed Thank you for reviewing your application to the CleanBC Industrial Incentive Program. after sending to Certifying Your application is almost complete. Official, they will not be able · Please send the secure URL below to a Certifying Official in your organisation to approve the application. You will be notified via email when this to certify • Once you have received notification that the application has been certified, you will need to return here to submit the application. -> will need to be re-sent . Once submitted, you will be notified via email when your application has been approved or if any further information is required to process your Once you have reviewed the application and ensured all the data is correct, the application has to be certified. certifier@certi.fy ☑ Notify certifier via email that this application is ready for certification URL sent!



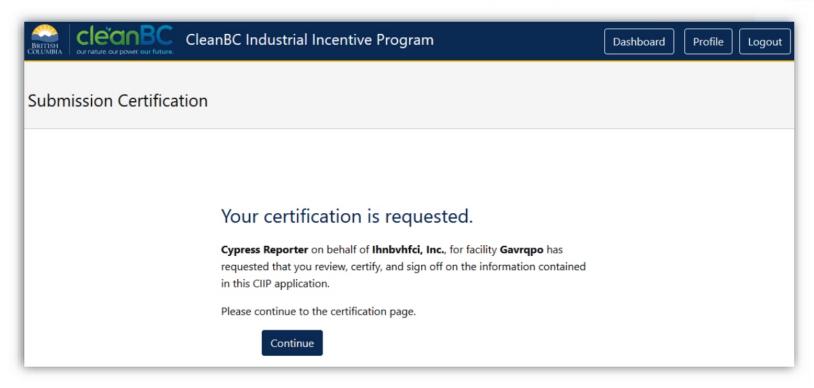
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Copy Link

dev.ciip.gov.bc.ca/certifier/certification-redirect?rowld=7c8LJtU5FQDyHWPh

CERTIFICATION (CONT.)





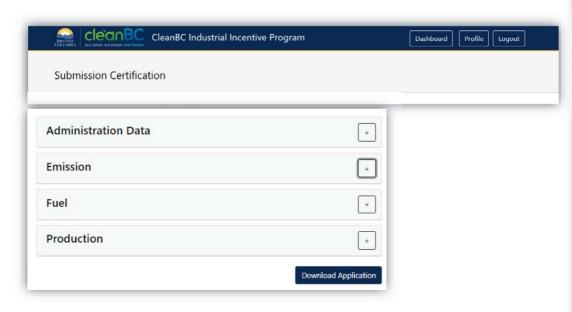
Certifier registers in the application, but they do not need to be approved by CAS

Certifier 'approved' by the operational representative (by requesting certification)

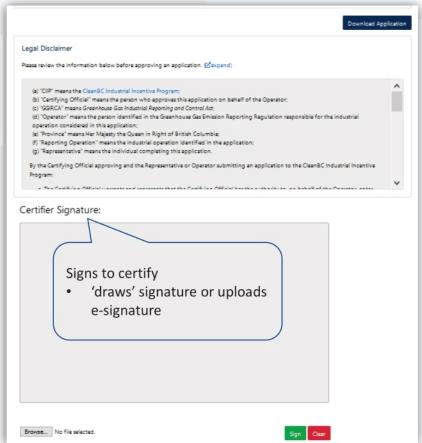


CERTIFICATION (CONT.)





Certifier reviews application - summary page

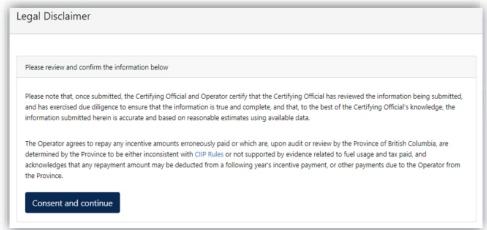


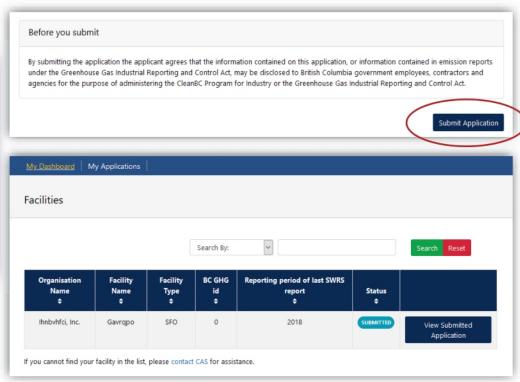


APPLICATION SUBMISSION



Once certified, application returned to applicant for submission



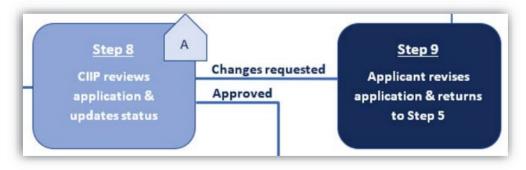




CAS REVIEW OF APPLICATION



- Upon receipt of application, CAS will review application for completeness and accuracy
- If revisions necessary, application will be sent back to applicant
- Applicant will need to re-obtain certification and then re-submit application
- If, no revisions required, applicant will be informed of application status and second payment processing will begin





IF ISSUES ARISE DURING APPLICATION



- Please contact us at GHGregulator@gov.bc.ca
- To ensure the quickest resolution to issues you might have please provide:
 - Problem description/explanation, e.g.:
 - Summary
 - How can problem be replicated, what "triggered" the issue
 - Expected result vs. actual result
 - Reporter/operation
 - Include URL and screenshots
 - What browser, operating system and platform are you using?



CONCLUSION & NEXT STEPS



- New system should be more user-friendly, but patience is requested.
- Start early and have information and people lined up
- Contact CAS (<u>GHGregulator@gov.bc.ca</u>) with questions or issues
- Sector-specific webinars focused on benchmarks and thresholds will be scheduled if required
 - Oil and Gas Sector specific webinar to be held in the last week of July.
- Other sectors can contact CAS to request meetings



THANK YOU



- A copy of this presentation will be emailed to all webinar participants.
- Application: <u>CIIP.gov.bc.ca</u>
- A fact sheet and Guidance Documents available on the <u>CleanBC</u> <u>Industrial Incentive Program website</u>.
- For follow-up CIIP questions email GHGregulator@gov.bc.ca.





CLEANBC INDUSTRIAL INCENTIVE PROGRAM

Program Update

June 11, 2020

AGENDA



- Background: CleanBC Program for Industry
- Update on CIIP Program Structure
- Overview of Benchmarks and Thresholds
- Other considerations
- Next Steps

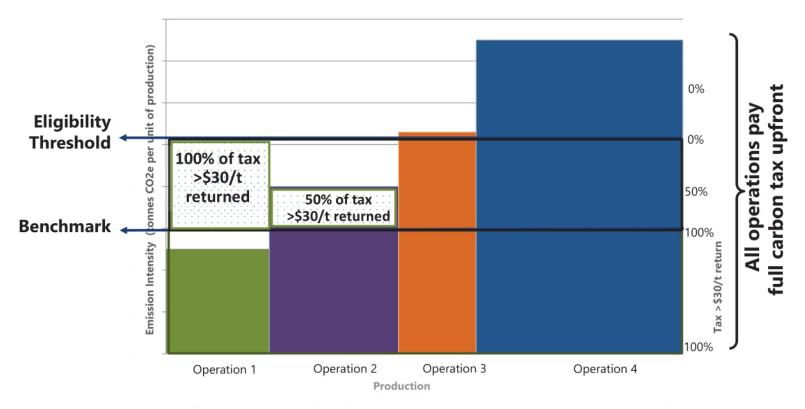
CLEANBC PROGRAM FOR INDUSTRY cleanBC

- Program Objectives are to support the competitiveness of B.C. industrial facilities and to facilitate emission reductions
- Program funded by incremental (i.e. portion > \$30/tonne) carbon tax paid by large industry
- Open to emitters > 10,000 tCO2e annually within eligible sectors
 - Reporting Operations under the *Greenhouse Gas Industrial Reporting and Control Act*.
- 2 components:
 - CleanBC Industrial Incentive Program (CIIP)
 - CleanBC Industry Fund (CIF)



CIIP IN A NUTSHELL





Carbon tax is paid each year as fuel is produced or purchased.

CIIP payments are provided in the following year based on program guidelines.





UPDATE ON CIIP PROGRAM STRUCTURE

2018 reporting year:

2019 reporting year:

Transition year: Incentives at 75 percent of incremental carbon tax paid, regardless of emissions intensity

Additional transition year: Incentives at 75 percent of incremental carbon tax or

incremental carbon tax or based on product emission intensity compared to benchmark—whichever is higher

CIIP TIMELINES FOR 2020



Milestone	Date
CIIP Initial Payments:	June – July 2020
CIIP application webinar	July 9, 2020
Single Window Reporting System (SWRS) Deadline:	July 31, 2020
CIIP application deadline:	August 31, 2020
CIIP Second Payment:	November 2020
CIIP Emission Reduction plan	December 31, 2020



CIIP TRANSITION YEAR



- In 2020, facilities will receive an incentive payment based on the higher of:
 - a) The incentive ratio based on how emissions intensity compares with the product/activity's benchmark and threshold; or,
 - b) 75 percent.
- Facilities receiving the 75 percent incentive required to submit emission reduction plan



PERFORMANCE BENCHMARK



- Performance benchmarks based on third party studies:
 - 1. Global Scan of world facilities, or
 - 2. 'Best in Class' engineered benchmark.
- Most surveyed benchmarks based on top 5 global facilities weighted for production.
 - B.C. facilities not included.
 - Benchmarks/thresholds can be found in appendix of this presentation and also at the CIIP <u>webpage</u>.:



INCENTIVE PAYMENT FORMULA



- A product's incentive payment is calculated by multiplying the product's incremental carbon tax by the incentive ratio.
- The incentive ratio is how the product's emissions intensity compares with the benchmark and threshold
- Incentive $Ratio_i = 1 \frac{Emission\ Intensity_i Benchmark_i}{Eligibility\ threshold_i Benchmark_i}$
- Incentives for facilities with multiple product will be the sum of their products' incentives
- Some sectors may receive a reduced incentive to recognize carbon tax already returned through existing programs (e.g. Greenhouse Carbon Tax Relief Grant Program)





MULTI-PRODUCT GUIDANCE

- Facilities producing more than one product are required to allocate emissions among each product.
- Emissions allocation is determined by:
 - Identifying processing units and assigning emissions to those units.
 - Identifying which products use which units as they move through the facility.
 - Applying appropriate allocation methods to shared units to delineate emissions between products.
 - Sum emissions from shared units, and units dedicated for each product.
- Allocation for combined heat and power, as well as exported energy, will be addressed through sector-specific guidance materials.



CIIP REPORTING APPLICATION



(GREENHOUSE GAS INDUSTRIAL REPORTING AND CONTROL SYSTEM)

- CIIP application process re-designed to reduce effort for reporters.
- Application will upload data from Single Window Reporting System to reduce amount of data entry.
- Reporters to confirm uploaded data and enter production and other information.
- CAS will provide guidance documents and calculation tools to facilitate reporting.
- For 2019 reporting year, no additional verification requirements on top of those in GGIRCA (i.e. production does not need to be verified).



CIIP REPORTING APPLICATION



(GREENHOUSE GAS INDUSTRIAL REPORTING AND CONTROL SYSTEM)

- Operation receives invitation to apply to CIIP and a grant letter
 - Operation provides banking information as needed and receives initial payment
- Applicant registers on CIIP portal and requests to apply for operation
- Applicant returns application and indicates Certifying official who will review
- Certifying official reviews and signs application
 - Applicant submits application
- CIIP team reviews application and either returns it to Applicant for revisions or determines CIIP incentive amount
- Operation receives second grant letter and, shortly after, second incentive payment



REPORTING SUPPORT AND BENCHMARKING STUDIES



- Sector specific Guidance documents and Excel calculators will be available to support applicants and will be available on a link on the CIIP website.
- Sector leads will support CIIP reporting and can be contacted at GHGregulator@gov.bc.ca
- Benchmarking studies will also be available on CIIP webpage



TREATMENT OF ELECTRICITY



- Many sectors must also report the GHG emissions associated with purchased grid electricity.
- Grid electricity emissions quantified by multiplying the published electricity emission intensity factors by the amount of purchased grid electricity $Q_{Purchased}^{Electr.}$ in MWh
- For some sectors, (pulp and paper, gypsum, chemicals, cement, lime) emissions from purchased electricity emissions are excluded
- Electricity that is produced as a by-product and sold to the grid will have 75% of incremental carbon tax emissions reimbursed



NEW ENTRANT PROVISION



- New Entrant Program supports new facilities which may take some time to achieve steady state emissions intensity.
- New greenfield facilities with CIIP benchmarks to receive 100 percent of incremental carbon tax (> \$30/tCO₂e) back for 24 months.
 - Time in 2018 transition year considered part of NEP participation.
- Facility must be a reporting facility under the *Greenhouse Gas Industrial Reporting and Control Act* (i.e. must have 10Kt emissions excluding those from Schedule C biomass).
- Must belong to a sector eligible for the CIIP.



NEW ENTRANT PROVISION NEXT STEPS



- Facility director must email GGIRCA director at <u>ghgregulator@gov.bc.ca</u> to request a start date of provision for facility.
- Start date must be between date facility receives leave (through permitting) to start operations and the date of first shipment of product



EMISSION REDUCTION PLAN



Facilities that are expected to receive a payment <75 percent in transition+ year will need to commit to submitting a GHG emission reduction plan to be eligible for 75 percent incentive.

• Plans are due prior to December 31st 2020 and must be submitted to ghgregulator@gov.bc.ca.

Currently seeking feedback on plan elements:

- Emission Reduction to 75 percent incentive payment or by 15 percent by 2030.
- Includes a high-level: description, budget, business case, and GHG reduction estimate for each project.



NEXT STEPS



- Sector-specific webinars focused on benchmarks and thresholds will be scheduled if required
 - Oil and Gas Sector specific webinar to be held in early July, 2020.
- Application walkthrough will be held via webinar July 9, 2020.
- Other sectors can contact CAS to request individualized meetings.



THANK YOU



- A copy of this presentation will be emailed to all webinar participants.
- A fact sheet is available on the <u>CleanBC Industrial</u> <u>Incentive Program website</u>.
- For follow-up CIIP questions email GHGregulator@gov.bc.ca.



APPENDIX: BENCHMARKS AND THRESHOLDS





BENCHMARKS AND THRESHOLDS cleanBC



Sector	Benchmark Type	Benchmark	Threshold	Units	
Aluminium	Global Survey	1.87	TBD	tCO ₂ e/t aluminum	
Cement		0.69	Confidential	tCO ₂ e/t cement equivalent	
Chemical	Engineered	0.86	Confidential	tCO ₂ e/t hydrogen	
(Hydrogen				peroxide	
Peroxide)					
Coal	Global Survey	0.063	0.132	tCO ₂ e/t coal	
Copper Equivalent - Open Pit	Global Survey	1.19	4.11	tCO ₂ e/t copper equivalent	
Conner Equivalent	Global Survey	1.31	Confidential	tCO ₂ e/t copper equivalent	
Electricity as a non-primary product	Fixed incentive level	Fixed incentive of 75% for electricity that is sold to the grid.			
Gold Equivalent	Global Survey	4,501.1	6,430.1	tCO₂e/t gold equivalent	



BENCHMARKS AND THRESHOLDS CONTINUED



Sector	Benchmark Type	Benchmark	Threshold	Units
		578	Confidential	tCO ₂ e/hectare of
	Engineered			eligible plant-
Greenhouse				growing area
dreeiiilouse		707	TBD	tCO ₂ e/hectare of
				cannabis plant-
				growing area
Gypsum	Global Survey	0.093	Confidential	tCO ₂ e/1000 square
dypsulli				feet gypsum
Lead Zinc	Engineered	1.27	Confidential	tCO ₂ e/t lead-zinc
		0.0176	0.0848	
Natural Gas	Engineered	(sour gas)	(sour gas)	tCO ₂ e/m³OE
Processing	Liigiileered	0.0080	0.0848	production
			(sweet gas)	
		0.4784	0.8592	
Natural Gas	Engineered	(centrifugal)	(Centrifugal)	tCO ₂ e/MWh
Compression	Liigiileeleu	0.5292	0.8592	consumed energy
		(reciprocating)	(reciprocating)	



BENCHMARKS AND THRESHOLDS CONTINUED



Sector	Benchmark Type	Benchmark	Threshold	Units		
Natural Gas less	Fixed incentive	Fixed incentive of 100% facilities, excluding natural gas				
than 10,000tCO2e	level	processing and compression				
Lime	Engineered	0.954	Confidential	tCO ₂ e/t lime and lime kiln dust		
Petroleum Refineries	Engineered	3.98	TBD	tCO ₂ e/ B.Cspecific complexity weighted throughput		
Pulp	Global Survey	0.058	0.461	tCO₂e/t chemical pulp tCO₂e/t other pulp		
Silver Equivalent	Global Survey	100.31	TBD	tCO ₂ e/t silver equivalent		
Steel Wire	Engineered	0.129	TBD	tCO₂e /t hot dip galvanized throughput		



BENCHMARKS AND THRESHOLDS CONTINUED



Sector	Benchmark Type	Benchmark	Threshold	Units
Steel Wire	Engineered	0.129	TBD	tCO ₂ e /t hot dip galvanized throughput
Steel Forging	Engineered	0.080	Confidential	tCO ₂ e/t steel balls (< 3.5")
		0.084	Confidential	tCO ₂ e/t steel balls (> 4")
Sugar	Engineered	0.14	Confidential	tCO ₂ e/t sugar
		0.15	Confidential	tCO₂e/t liquid sugar
Wood Products	Global survey	0.03	0.132	tCO₂e/m3 lumber
		0.07	Confidential	tCO ₂ e/m3 plywood
		0.03	Confidential	tCO₂e/m3 veneer





CleanBC Industrial Incentive Program Sector Specific Guidance

March 11, 2020 Aluminum Smelting Sector

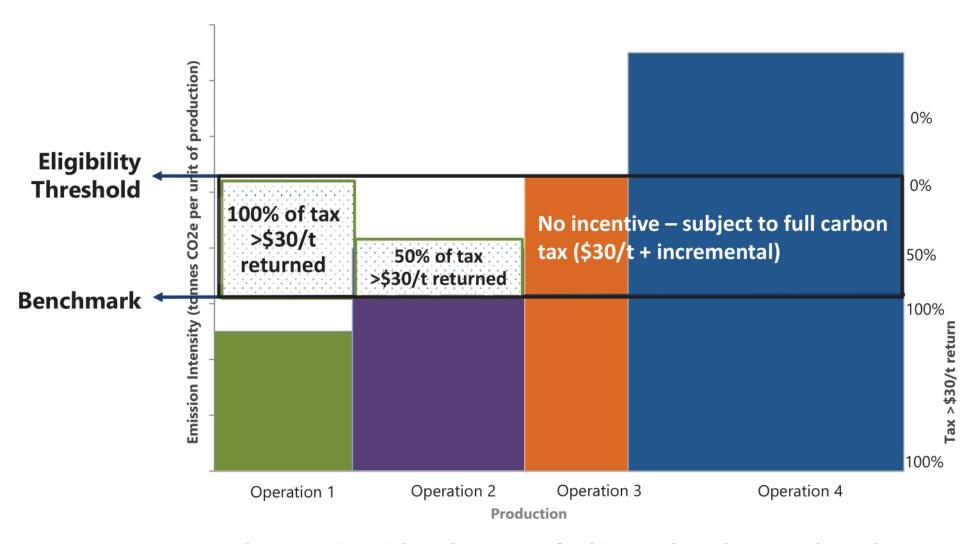


Context

- The objective for the CleanBC Program for Industry (CPI) is to enhance British Columbia's competitive advantages while reducing our own GHG emissions intensity
- Two CPI Initiatives:
 - CleanBC Industrial Incentive Program (CIIP): incentive payments based on operations' emissions intensity compared to a world-leading performance benchmark
 - CleanBC Industry Fund (CIF): funding for industrial emissions reduction projects
- The program is funded by the carbon tax paid by industry above \$30/tonne

CIIP in a nutshell





Carbon tax is paid each year as fuel is produced or purchased. CIIP payments are provided in the following year based on program guidelines



Sector	Benchmark	Threshold	Units
Aluminum Smelting	1.87	CONF*	tCO2e/t Aluminum

^{*}Due to confidentiality concerns, the threshold will not be made public.



Quantification of Production

Aluminum -

All saleable aluminum produced at the reporting operation within the application year should be reported in tonnes (t)

Note: The production levels of calcined green coke and anodes do not need to be reported in the CIIP application form. The Province may request production and emission data for these two products to inform future benchmarking.



Allocation

Although the benchmark & threshold are only based on the production of aluminum, total emissions must be allocated (summing to 100%) among:

- Aluminum production,
- Green coke calcination,
- Anode production, and
- Electricity sold to grid;

where Aluminum production = anode reduction (includes anode consumption, anode effect, and electricity).



Emissions Quantification

Emissions for CIIP =

- Total Emissions
- + Emissions from Hydro Electricity
- Emissions from Green Coke Calcination
- Emissions from Anode Production

Note: Emission Intensity Factor for self-generated hydro electricity = 10.5 tCO2e/GWh



Example (production/emission numbers are merely illustrative)

	Production (t or MWh)		Emissions Allocation	Emissions Intensity (tCO2e/t AI)	Performance against Benchmark
Facility:		228,500	100%		98%
Aluminum	100,000	192,000	84%	1.92	98%
Calcined Coke	30,000*	15,100	6%	N/A	N/A
Anode	40,000*	16,400	7%	N/A	N/A
Sold Electricity	600,000	6,300	3%	N/A	N/A

^{*}The production levels of calcined coke and anodes do not need to be reported in the application form. The Province may request this information to inform future benchmarking.

Total facility emissions must be reported and allocated among products. Incentive payments, though, will be based on the emissions intensity of aluminum production compared to the world leading benchmark. The incentive amount will be applied to all incremental carbon tax payments.



Discussion Topics

- Data confidentiality
- Verification requirements:
 - Sources of production data (audited financial statements?)
 - Product measurement methodology
 - Uncertainties in product measurement
 - Calibration of measurement equipment
 - Allocation methodology
- Guidelines may be updated in the future

From: Picard, Frederic (RTA)

To: Peyman, Hurrian ENV:EX; Schnarr, Emilie ENV:EX; Richard Prokopanko; Gabriel, Jasmin ENV:EX

Cc: Gauthier, David 4 (RTA); Milliard, Johanne (RTA); Grossmann, Meagen (RTA)

Subject: RE: [External] Mobile emissions and the CIIP benchmark for aluminum

Date: March 12, 2020 10:58:47 AM

Thanks Hurrian.

Fred

Frederic Picard, Ph.D., P. Chem Director – Climate Change, Atlantic Operations Aluminium

Rio Tinto

400-1190 Avenue des Canadiens-de-Montréal, Montreal, Quebec, H3B 0E3, Canada

M: +1 514 743 1512

frederic.picard@riotinto.com http://www.riotinto.com

From: Peyman, Hurrian ENV:EX < Hurrian.Peyman@gov.bc.ca>

Sent: March 12, 2020 11:40 AM

To: Schnarr, Emilie ENV:EX <Emilie.Schnarr@gov.bc.ca>; Picard, Frederic (RTA)

<frederic.picard@riotinto.com>; Richard Prokopanko <richardp@prichardsinc.com>; Gabriel, Jasmin

ENV:EX <Jasmin.Gabriel@gov.bc.ca>

Cc: Gauthier, David 4 (RTA) <David.Gauthier4@riotinto.com>; Milliard, Johanne (RTA)

<johanne.milliard@riotinto.com>; Grossmann, Meagen (RTA) <Meagen.Grossmann@riotinto.com>

Subject: [External] Mobile emissions and the CIIP benchmark for aluminum

Hi,

Thank you to the Rio Tinto Alcan team for yesterday's meeting.

One question came up about whether mobile emissions should be factored into the emissions intensity of aluminum production. The argument was that these emissions, (although small), were not incorporated in the analysis done by Ernst and Young about world leading facilities.

For the calculation of aluminum emissions intensity for the purpose of the CIIP program, mobile emissions will NOT be incorporated.

If you have any questions on this, please don't hesitate to contact me.

Hurrian

----Original Appointment----

From: Schnarr, Emilie ENV:EX < Emilie.Schnarr@gov.bc.ca>

Sent: February 25, 2020 8:53 AM

To: Schnarr, Emilie ENV:EX; Picard, Frederic (RTA); Richard Prokopanko; Peyman, Hurrian ENV:EX;

Gabriel, Jasmin ENV:EX

Cc: Gauthier, David 4 (RTA); Milliard, Johanne (RTA); Grossmann, Meagen (RTA) **Subject:** INVITE: CleanBC Industrial Incentive Program - Review of Guidance

When: March 11, 2020 11:30 AM-12:00 PM (UTC-08:00) Pacific Time (US & Canada).

Where: Skype Meeting

Please see attached for deck we will cover.

Hello All,

As noted in the previous email, I am scheduling this meeting to review the guidance we will provide to facilities about how to correctly complete the application process for the Clean BC Industrial Incentive Program for the Aluminum Smelting sector.

The meeting will provide additional detail about the additional application requirements (e.g. quantification of production and emissions allocation). We would also like to discuss verification requirements, including sources of production data and methodology to be used for allocations.

Thank you, Emilie

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English (United States)

English (United States)

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Page 2 of 11 MOE-2020-06234

 From:
 Picard, Frederic (RTA)

 To:
 Peyman, Hurrian ENV:EX

 Cc:
 Chisholm, Carolyn (RTCMI)

Subject: CIIP form, hydroelectricity generation and aluminum production

Date: August 31, 2020 12:10:49 PM

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Hurrian,

I hope you had a good summer and that you are all rested for the new year!

We are in the process of filling in the CIIP form for 2019 that is now due September 8th and they are a couple of questions that were raised.

- 1) Intensity of self-generated hydroelectricity:
 - a. The new guidance (https://www2.gov.bc.ca/assets/gov/environment/climate-change/ind/cleanbc-program-for-industry/guidance/guidance_ciip_aluminum.pdf) that was published in July asked to use a value of 10.5 tCO2e/GWh for self-generated hydro-electricity. This is the first time using an emission coefficient for hydro-electricity generated is mentioned. In fact, NRCan considers hydro-electricity as a renewable source of energy and in every province where we operate we use a coefficient of zero in our yearly provincial and federal reports. In the BC GHG report that we produce every year, including for 2019, there are no emissions associated with the production of electricity. This will generate reports (GHG BC report and the CIIP report) with different values going to the same government. How do I answer questions on this dual reporting?
 - b. The fact that reservoirs might produce methane due to the anaerobic decomposition of organic matter is well known but the amount is not. This is dependent on many factors including the age, the water temperature, etc. In addition, since the emissions are more related to the reservoir surface area than the generation, it is tricky to report it by GWh produced. We would be interested to know on which study this value of 10.5 is based on? Does it considered the specificity of the Nechako reservoir? Is it the same value that is being used by BC Hydro?
- 2) Production of aluminum:
 - a. The new guidance asked to use *saleable aluminum*. However, our reporting, including the GHG BC report, is based on *hot metal produced*. The data that were used by E&Y to determine the international benchmark were on hot metal produced. Finally, for those reasons, only the hot metal produced was verified by PWC for our annual reporting in the GHG BC report and the federal report. Our commercial team does have inventory data, products sold and scrap generated but these numbers are not audited. So, we would suggest to use hot metal produced instead of saleable metal in the CIIP report.

I am available for a call if it helps the discussion.

Best regards, Fred

Frederic Picard, Ph.D., P. Chem Director — Climate Change, Atlantic Operations Aluminium

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frederic.picard@riotinto.com http://www.riotinto.com

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 To:
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Cc: Chisholm, Carolyn (RTCMI); D"Souza, Don ENV:EX; Schnarr, Emilie ENV:EX; Vovk, Hanna ENV:EX; Gabriel,

Jasmin ENV:EX; GHG Regulator ENV:EX

Subject: RE: [External] RE: CIIP form, hydroelectricity generation and aluminum production

Date: August 31, 2020 1:46:09 PM

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hi Hurrian,

Thanks for the timely answer. Very appreciated.

Thanks for the precision on the hydro-electricity emission factor and we will use it as prescribed. I remember discussions on Site C but I had never seen the 10.5 tons/GWh. This is a topic of discussion in many places and we were surprised to see that there will be two different reported numbers for the same jurisdiction. I would still be interested to see a document showing the calculations and rationales that resulted in that choice if it exists.

On the metal production, this is only a matter of deciding where on the value chain we want to quantify the production. In all locations that I am aware of, for GHG purpose, the aluminum is quantified at the exit of the reduction area where the metal is still hot and liquid. The quantity will be slightly different form the cold metal area since it does not account for the added allows (Mg, Si, etc.), potential remelting of scrap, and for some losses (skimming, scrap metal, etc.). There is nothing wrong between the two other than a general consensus and due to the fact that the hot metal production is already verified by an external auditor for federal and provincial GHG reporting. I am trying to avoid another verification process for a few more thousand tons of cold metal. In terms of intensity it would be beneficial to us to use the saleable metal as the denominator would be bigger.

Regards, Fred

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From: Peyman, Hurrian ENV:EX < Hurrian.Peyman@gov.bc.ca>

Sent: August 31, 2020 3:26 PM

To: Picard, Frederic (RTA) <frederic.picard@riotinto.com>

Cc: Chisholm, Carolyn (RTCMI) <Carolyn.Chisholm@riotinto.com>; D'Souza, Don ENV:EX <Don.DSouza@gov.bc.ca>; Schnarr, Emilie ENV:EX <Emilie.Schnarr@gov.bc.ca>; Vovk, Hanna ENV:EX <Hanna.Vovk@gov.bc.ca>; Gabriel, Jasmin ENV:EX <Jasmin.Gabriel@gov.bc.ca>; GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

Subject: [External] RE: CIIP form, hydroelectricity generation and aluminum production

Hi Frederic,

Thanks for the email and I hope you too had a happy and healthy summer.

On your points:

- We recognize that the inclusion of electricity into the emissions for a facility (whether it be purchased electricity or in RTA's case, generated hydro) this will cause a difference between the emissions reported for the facility and that reported in CIIP.
- I'm very confident that we have had at least two conversations about an appropriate emissions intensity for hydro-electricity and I'm also confident that I had let you know that we'd landed on an intensity that was consistent with that was consistent with that of Site C. Agree that there are a lot of factors that determine methane emissions. Recognize that Nechako is 60+ years old and that methane emissions will have dropped VERY significantly from the first years. The methane emissions are intended to be an average over the full life of the dam. It was also assumed that the Nechako dam did not have the same methane reducing measures (e.g. scraping and transporting soil and biomass from reservoir site that occurred at Site C.) The 10.5 t/GWh is recognized as an approximation but the best that could be done with limited information.
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Hurrian

From: Picard, Frederic (RTA) < frederic.picard@riotinto.com>

Sent: August 31, 2020 12:11 PM

To: Peyman, Hurrian ENV:EX < <u>Hurrian.Peyman@gov.bc.ca</u>> **Cc:** Chisholm, Carolyn (RTCMI) < <u>Carolyn.Chisholm@riotinto.com</u>>

Subject: CIIP form, hydroelectricity generation and aluminum production

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Best regards, Fred

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Cc: Chisholm, Carolyn (RTCMI); D"Souza, Don ENV:EX; Schnarr, Emilie ENV:EX; Vovk, Hanna ENV:EX; Gabriel,

Jasmin ENV:EX; GHG Regulator ENV:EX

Subject: RE: [External] RE: CIIP form, hydroelectricity generation and aluminum production

Date: September 2, 2020 4:20:00 PM

Hi,

Apologies on delayed response. I think if you input your verified totals for "hot metal" as aluminum production, that would be acceptable. We can revise the guidance document to state that hot metal totals are considered equivalent to aluminum production totals. It would be difficult to change the product at this point because we have already received approval from decision makers to set the benchmark for aluminum production.

Hurrian

From: Picard, Frederic (RTA) <frederic.picard@riotinto.com>

Sent: August 31, 2020 1:46 PM

To: Peyman, Hurrian ENV:EX < Hurrian.Peyman@gov.bc.ca>

Cc: Chisholm, Carolyn (RTCMI) <Carolyn.Chisholm@riotinto.com>; D'Souza, Don ENV:EX <Don.DSouza@gov.bc.ca>; Schnarr, Emilie ENV:EX <Emilie.Schnarr@gov.bc.ca>; Vovk, Hanna ENV:EX <Hanna.Vovk@gov.bc.ca>; Gabriel, Jasmin ENV:EX <Jasmin.Gabriel@gov.bc.ca>; GHG Regulator ENV:EX <GHGRegulator@gov.bc.ca>

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Sent: August 31, 2020 3:26 PM

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Cc: Chisholm, Carolyn (RTCMI) < Carolyn.Chisholm@riotinto.com >; D'Souza, Don ENV:EX < Don.DSouza@gov.bc.ca >; Schnarr, Emilie ENV:EX < Emilie.Schnarr@gov.bc.ca >; Vovk, Hanna ENV:EX < Hanna.Vovk@gov.bc.ca >; Gabriel, Jasmin ENV:EX < Jasmin.Gabriel@gov.bc.ca >; GHG Regulator ENV:EX < GHGRegulator@gov.bc.ca >

Subject: [External] RE: CIIP form, hydroelectricity generation and aluminum production

Hi Frederic,

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Sent: August 31, 2020 12:11 PM

To: Peyman, Hurrian ENV:EX < <u>Hurrian.Peyman@gov.bc.ca</u>> **Cc:** Chisholm, Carolyn (RTCMI) < <u>Carolyn.Chisholm@riotinto.com</u>>

Subject: CIIP form, hydroelectricity generation and aluminum production

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Hi Hurrian,

I hope you had a good summer and that you are all rested for the new year!

We are in the process of filling in the CIIP form for 2019 that is now due September 8th and they are a couple of questions that were raised.

- 1. Intensity of self-generated hydroelectricity:
 - a. The new guidance (https://www2.gov.bc.ca/assets/gov/environment/climate-change/ind/cleanbc-program-for-industry/guidance/guidance_ciip_aluminum.pdf) that was published in July asked to use a value of 10.5 tCO2e/GWh for self-generated hydro-electricity. This is the first time using an emission coefficient for hydro-electricity generated is mentioned. In fact, NRCan considers hydro-electricity as a renewable source of energy and in every province where we operate we use a coefficient of zero in our yearly provincial and federal reports. In the BC GHG report that we produce every year, including for 2019, there are no emissions associated with the production of electricity. This will generate reports (GHG BC report and the CIIP report) with different values going to the same government. How do I answer questions on this dual reporting?
 - b. The fact that reservoirs might produce methane due to the anaerobic decomposition of organic matter is well known but the amount is not. This is dependent on many factors including the age, the water temperature, etc. In addition, since the emissions are more related to the reservoir surface area than the generation, it is tricky to report it by GWh produced. We would be interested to know on which study this value of 10.5 is based on? Does it considered the specificity of the Nechako reservoir? Is it the same value that is being used by BC Hydro?
- 2. Production of aluminum:
 - a. The new guidance asked to use *saleable aluminum*. However, our reporting, including the GHG BC report, is based on *hot metal produced*. The data that were used by E&Y to determine the international benchmark were on hot metal produced. Finally, for those reasons, only the hot metal produced was verified by PWC for our annual reporting in

the GHG BC report and the federal report. Our commercial team does have inventory data, products sold and scrap generated but these numbers are not audited. So, we would suggest to use hot metal produced instead of saleable metal in the CIIP report.

I am available for a call if it helps the discussion.

Best regards, Fred

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