

California State University, San Jose (ID #100131) Emissions Year 2018

# Verification Report

California Air Resources Board Cal e-GGRT Report

Prepared by:



50 Hegenberger Loop  
Oakland, CA 94621

[www.cameron-cole.com](http://www.cameron-cole.com)

Version Number: I

Version Date: 7/9/19



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## 1.0 Introduction

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Cameron-Cole, LLC (Cameron-Cole) has been retained by California State University, San Jose (SJSU) to verify its California Electronic Greenhouse Gas Reporting Tool (Cal e-GGRT) report for Emissions Year (EY) 2018 submitted to the California Air Resources Board (ARB) for compliance with the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (ARB GHG Reporting Rule)<sup>1</sup>. This verification was conducted between May and July 2019.

This Verification Report presents the findings of the verification activities.

### 1.1 Verification Scope

A description of SJSU's GHG emissions report included in the scope of verification activities is as follows:

- **Facility Location:** San Jose, California. The facility boundary includes all sources at the main campus located west-east between 4th and 10th Street and north-south between San Fernando and San Salvador Streets.
- **Greenhouse Gases:** carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>)
- **Covered Data:**
  - Direct Emissions from Stationary Combustion Sources: one cogeneration unit, three auxiliary boilers located at the cogeneration unit, and 16 utility natural gas meters supplying fuel to campus buildings (boilers, kilns, two 60 kW Tecogens, laboratory equipment, and kitchen equipment)
- **Other Data:**
  - Electricity Purchases/Acquisitions
  - Natural Gas Purchases/Acquisitions
  - Electricity & Steam Generation & Disposition
- **Facility Description:** The SJSU facility is a cogeneration power plant providing heating and cooling to SJSU. The facility is connected to the campus via steam and condensate delivery pipes. All data is measured in real time using in-line meters that feed into an integrated data management system.

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<sup>1</sup> Cameron-Cole will use all available formally updated guidance as published by ARB, such as FAQs in addition to the ARB GHG Reporting Rule.



## 1.2 Data Management

At the SJSU facility, they employ the following data management systems:

- **Data Acquisition & Tracking:** For the stationary combustion emission sources, the quantity of natural gas combusted at the facility and the electricity consumption were based on PG&E invoice records which document monthly usage. The monthly usage quantities were hand transcribed and tabulated in Microsoft Excel.

For the steam and thermal information tracking, there are meters embedded within the delivery and production system that provide real-time tracking of various data points (such as temperature, pressure, and volume). These systems are relied on for final data reporting values as entered into Cal e-GGRT.

- **Emission calculation/ product data systems:** For the stationary combustion sources, the total annual quantity of natural gas was entered into the Cal e-GGRT report to calculate the emissions.

For the steam/thermal energy, the annual totals were derived from pre-existing tracking systems, and were uploaded/entered into Cal e-GGRT.

## 2.0 Verification Plan

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The Verification Plan is provided as **Attachment A** and includes information on the following:

- Level of assurance
- Verification objectives
- Verification criteria
- Verification scope
- Materiality
- Verification activities and schedule.



### 3.0 Data Checks & Issues Log

#### 3.1 Issues Log

During the course of verification activities, the Verification Team maintained a log of the issues identified that could potentially affect determinations of material misstatements and nonconformance. A summary of these issues and how they were resolved is in presented in **Table I** below.

**Table I. Verification Issues Log**

Activity	Issue	Regulatory Section	Potential Impact on Data and/or Compliance	Resolution
<b>CAR#1</b> Electricity Purchases/ Acquisitions	One electricity account (Washburn) was excluded from the inventory	§ 95104(d)(1)	Non-conformance, Nonmaterial misstatement- Update to eGGRT Report is mandatory	Closed – corrected in eGGRT
<b>CAR#2</b> GP-Balance of Campus	The number of meters listed in the description on the eGGRT Report does not match the number of meters listed in the supporting documentation.	§95131(b)(9)	Non-conformance Update to GHG Monitoring Plan is mandatory	Closed – corrected in eGGRT
<b>CAR#3</b> GHG Monitoring Plan - Block Diagram	The Block Diagram is outdated and does not include the references to the current regulation.	§95105(c)(3)	Non-conformance Update to GHG Monitoring Plan is mandatory	Closed – updated attached in eGGRT
<b>CAR#4</b> GHG Monitoring Plan – Meter Map	The meter map is outdated and does not include the Washburn meter.	§95105(c)	Non-conformance Update to GHG Monitoring Plan is mandatory	Closed – updated attached in eGGRT



Activity	Issue	Regulatory Section	Potential Impact on Data and/or Compliance	Resolution
<b>CAR#5</b> Total Thermal Output	The reported Total Thermal Output MMBtu does not match what is reported in “2018 GHG Report” spreadsheet.	§95112(b)(3)	Non-conformance, Nonmaterial misstatement- Update to eGGRT Report is mandatory	Closed – corrected in eGGRT
<b>CAR#6</b> Generated Electricity for Grid Generation	The reported Total Generated Electricity for Grid Generation MWh does not match what is reported in “2018 GHG Report” spreadsheet.	§95112(a)(4)	Non-conformance Update to GHG Monitoring Plan is mandatory	Closed – corrected in eGGRT
<b>CAR#7</b> Stationary Combustion – Natural Gas	Proration error in January 2018 for the Student Union account.	§95115(k)	Nonmaterial misstatement- Update to eGGRT Report is mandatory	Closed – corrected in eGGRT
<b>CAR#8</b> GP-Balance of Campus	Annual Natural Gas usage (therms) reported in eGGRT does not match documentation.	§95115(k)	Nonmaterial misstatement- Update to eGGRT Report is mandatory	Closed – corrected in eGGRT

All issues were addressed by SJSU resulting in revision and resubmission of the e-GGRT Report.

### 3.2 Data Checks

To assess the accuracy of SJSU’s submitted emissions data report, Cameron-Cole conducted data checks. A detailed comparison of the data checks with the submitted emissions data report is provided in **Table 2** below. The ‘Reported CO<sub>2</sub>e’ column below represents the emissions from the resubmitted e-GGRT Report.



**Table 2. GHG Emissions Data Check Summary**

Emitting Activity Name	Emitting Activity Category	Gas	Reported CO <sub>2</sub> e (MT)	Cameron-Cole Recalculated CO <sub>2</sub> e (MT)	Reason for Difference	Materiality
Unit Name: GP- SJSU Cogen	Fuel: Natural Gas	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O	24,488.80	24,488.80	No Issue	0.0000%
Unit Name: GP- Auxiliary Boilers	Fuel: Natural Gas	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O	2,362.08	2,362.08	No Issue	0.0000%
Unit Name: GP- Balance of Campus	Fuel: Natural Gas	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O	766.6	766.6	No Issue	0.0000%
Unit Name: GP- Balance of Campus (de minimis)	Fuel: Natural Gas	CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O	1.09	1.09	No Issue	0.0000%
<b>Total Covered Emissions</b>			<b>27,618.62</b>	<b>27,618.62</b>	0.00001%	

In order to meet the requirements of Section 95131(b)(12)(A) of ARB’s GHG Reporting Rule, Cameron-Cole did a material misstatement assessment for covered emissions using the following equation:

$$\text{Percent error (emissions)} = \sum \frac{[\text{Discrepancies} + \text{Omissions} + \text{Misreporting}] \times 100\%}{\text{Total reported covered emissions}}$$

Cameron-Cole calculated a percent error of 0.00001% for covered emissions for SJSU’s e-GGRT Report. The difference in reported versus recalculated emissions is solely due to rounding and does not represent a correctable error. Therefore, SJSU’s reported emissions met the accuracy requirement of ARB’s GHG Reporting Rule.



**Table 3. Non-Emissions Data Review**

Activity Name	Activity Category	Units	Reported Value	Cameron-Cole Recalculated Value	Reason for Difference
Pacific Gas and Electric Company (PG&E)	Electricity Purchases/Acquisitions for Reporting Facilities (95104(d))	MWh	18,779.00	18,779.06	Rounding
Pacific Gas and Electric Company (PG&E) - Supplier of Natural Gas (All Accounts)	Natural Gas Purchases/Acquisitions for Reporting Facilities [95115(k), 95103(a)(1)]	MMBtu	520,380.11	520,380.21	Rounding
Disposition of Generated Electricity [95112(a)(4)]	Generated Electricity for Grid Disposition [95112(a)(4)(A)]	MWh	81.00	80.52	Rounding
Portion of Generated Electricity used to Produce Cooling Energy For Other End-Users or For On-site Industrial Process Not in Support of the Power Generation System [95112(a)(4)(C)1-2]	Amount of Electricity	MWh	6,487.00	6,486.52	Rounding
Portion of Generated Electricity used to Produce Cooling Energy For Other End-Users or For On-site Industrial Process Not in Support of the Power Generation System [95112(a)(4)(C)1-2]	Parasitic Steam Use: Generated thermal energy used for supporting power production (excluding steam used directly for generating electricity) [95112(a)(5)(B)]:	MMBtu	0	0	No issue





Activity Name	Activity Category	Units	Reported Value	Cameron-Cole Recalculated Value	Reason for Difference
Portion of Generated Electricity used to Produce Cooling Energy For Other End-Users or For On-site Industrial Process Not in Support of the Power Generation System [95112(a)(4)(C)1-2]	Generated thermal energy for on-site industrial applications not related to electricity generation [95112(a)(5)(C)]:	MMBtu	139,207.00	139,206.51	Rounding
Portion of Generated Thermal Energy Used to Produce Cooling Energy or Distilled Water for Other End-Users or For On-Site Industrial Process not in support of the Power Generation System [95112(a)(5)(C)1-2]:	Amount of Thermal Energy	MMBtu	10,154.00	10,153.82	Rounding
Unit Name: GP- SJSU Cogen	95112(b)(2): Gross Generation	MWh	31,502.00	31,502.41	Rounding
Unit Name: GP- SJSU Cogen	95112(b)(2): Net Generation	MWh	30,132.00	30,132.30	Rounding
Unit Name: GP- SJSU Cogen	95112(b)(3): Total Thermal Output (for Cogeneration or Bigeneration)	MMBtu	139,207.00	139,206.51	Rounding

Cameron-Cole identified minor rounding discrepancies for the reported non-emissions data noted above. Since the discrepancies were due to rounding, they do not represent correctible errors. Therefore, Calpine’s eGGRT Report conforms to the requirements of ARB’s GHG Reporting Rule.



## 4.0 Statement & Qualifications

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Cameron-Cole can provide reasonable assurance that the EY 2018 Cal e-GGRT Report for California State University, San Jose facility located at One Washington Square, San Jose, California is free of material misstatements and is in conformance with the ARB GHG Reporting Rule.

A copy of the Verification Statement that will be submitted to ARB is provided as **Attachment B**.

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H. Dru Krupinsky                      7/9/19  
Lead Verifier  
Cameron-Cole, LLC

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Mallory Andrews                      7/9/19  
Independent Reviewer  
Cameron-Cole, LLC

**DCN 564**

**Version 2.0**

**Date: 01.14.19**

**Approved by: GHG Director**



## **Attachment A – Verification Plan**

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San Jose State University (ID #100131) Emissions Year 2018

# Verification Plan

California Air Resources Board Cal e-GGRT Report

Version 2:

Version Date: 7/8/2019

**Cameron-Cole, LLC**

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## 1.0 Introduction

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Cameron-Cole, LLC (Cameron-Cole) has been retained by San Jose State University (SJSU) to perform a verification of its California Electronic Greenhouse Gas Reporting Tool (Cal e-GGRT) report for Calendar Year (CY) 2018, which was submitted to the California Air Resources Board (ARB) for compliance with the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (ARB GHG Reporting Rule)<sup>1</sup>. This verification will be conducted between May and July 2019.

This Verification Plan includes information on the following:

- Level of assurance
- Verification objectives
- Verification criteria
- Verification scope
- Materiality
- Facility Location
- Verification activities and schedule.

## 2.0 Level of Assurance

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The level of assurance is used to determine the depth of detail that a verifier designs into the verification plan to determine if there are material omissions, errors or misstatements. Two levels of assurance are generally recognized – reasonable and limited. Reasonable assurance statements generate the highest level of confidence, and provide reasonable assurance that the Cal e-GGRT report is materially correct. Limited assurance statements provide less confidence, and involve less detailed examination of GHG data and supporting documentation. Limited assurance statements assert that there is no evidence that the Cal e-GGRT is not materially correct.

Per ARB GHG Reporting Rule requirements, Cameron-Cole will conduct the verification activities in a manner that will result in a reasonable level of assurance.

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<sup>1</sup> Cameron-Cole will use all available formally updated guidance as published by ARB, such as FAQ's in addition to the Regulation.



### 3.0 Verification Objectives

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The primary objectives of the verification are to:

- Verify whether SJSU's CY2018 Cal e-GGRT report meets the generally accepted GHG accounting principles of accuracy, completeness, transparency, relevance and consistency.
- Determine if SJSU has reported all emissions and product data in conformance with the ARB GHG Reporting Rule.
- Determine whether or not SJSU's CY2018 Cal e-GGRT report meets/exceeds the 95% threshold for accuracy required by the ARB.

### 4.0 Verification Criteria

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The verification process will maintain the criteria of completeness, consistency, accuracy, comparability and transparency as its underlying principles. Cameron-Cole will conduct verification activities to assess accuracy and conformance with the ARB GHG Reporting Rule. Where Cameron-Cole has identified deviations to the regulatory requirements specified in the ARB GHG Reporting Rule we will require approval from ARB for those deviations.

### 5.0 Verification Scope

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A description of the scope of verification activities is as follows:

- **Facility Location:** San Jose, California. The facility boundary includes all sources at the main campus located west-east between 4th and 10th Street and north-south between San Fernando and San Salvador Streets.
- **Greenhouse Gases Covered:** Carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>)
- **Covered Data:**
  - Direct Emissions from Stationary Combustion Sources: one cogeneration unit, three auxiliary boilers located at the cogeneration unit, and 16 utility natural gas meters supplying fuel to campus buildings (boilers, kilns, two 60 kW Tecogens, laboratory equipment, and kitchen equipment)
- **Non-Emissions Data:**
  - Electricity Purchases/Acquisitions



- Natural Gas Purchases/Acquisitions
- Electricity & Steam Generation & Disposition

## 6.0 Materiality

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The concept of materiality is used to determine if omitted or misstated GHG emissions information will lead to significant misrepresentations of emissions. A material misstatement is the aggregate of errors and omissions with program requirements, and/or misrepresentations that could influence the decisions of intended users.

ARB sets the materiality threshold at 5% (for both understatements and overstatements) of the overall facility CO<sub>2</sub> equivalent (e) emissions.

Material misstatement is calculated separately for covered product data at a materiality threshold of 5%, as specified in section 95131(b)(12)(A). Covered product data is evaluated for material misstatement, while the remaining reported product data is evaluated for conformance.

## 7.0 Discrepancies

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Cameron-Cole's verification activities include assisting SJSU in understanding any issues with its GHG Inventory processes, calculations, data and documentation, particularly those that result in a material discrepancy. Cameron-Cole will provide SJSU with information on discrepancies found during the course of the verification. Cameron-Cole will make every effort to provide this information in a timely manner (mostly likely in batches as the review progresses), so that SJSU has sufficient time to rectify the discrepancies. SJSU will then resubmit information to Cameron-Cole, preferably in batches, to allow Cameron-Cole ample time to re-verify the information.

SJSU must fix all correctable errors that affect covered emission in the submitted emissions data report and submit a revised emissions data report to ARB. If the discrepancy is material or results in non-conformity, Cameron-Cole will notify SJSU at least 10 working days before an adverse statement is submitted to ARB. If SJSU and Cameron-Cole cannot agree on a discrepancy, SJSU may petition the ARB before the reporting deadline and before the verification statement is submitted. ARB will provide the ultimate determination if a misstatement is material or non-conformant to the ARB GHG Reporting Rule.





## 8.0 Verification Activities

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### Verify emissions sources

Cameron-Cole will conduct a detailed desktop review of SJSU's source list to verify that all emissions sources, and fuels required to report under the ARB GHG Reporting Rule have been identified. All sources will be ranked by magnitude.

### Verify product data

Cameron-Cole will conduct a detailed desktop review of SJSU's production data to verify that all covered product data required to report under the ARB GHG Reporting Rule has been identified.

### Determine areas of high risk and uncertainty

Based on initial discussions, and on information gathered and evaluated in previous tasks, Cameron-Cole will then determine which sources (and resultant emissions estimates) have the highest risk of material error or misstatement. We will focus our efforts on these areas. The following are types of potential errors, omissions and misrepresentations that will be included in our assessment:

- The inherent risk of a material discrepancy occurring;
- The risk that the controls of the organization will prevent/ not prevent or detect a material discrepancy; and
- The risk that the verifier will not detect any material discrepancy that has not been corrected by the controls of the organization.

### Verification Sampling Plan and Data Request

Since it is generally inefficient to assess all GHG information collected by an organization, a risk-based approach will be employed in developing a Verification Sampling Plan. The Verification Sampling Plan will identify the sources that will be subject to evaluation.

Cameron-Cole will submit a Data Request to SJSU. The Data Request will request information including, but not limited to, the following:

- GHG data aggregation and calculation spreadsheets
- GHG Monitoring Plan



- A description of inventory management systems, including methods used to gather, transcribe (if applicable), QA/QC and aggregate activity data;
- Fuel and utility bills; and,
- Facility and cogen boundary maps.

The Verification Sampling Plan will be amended, when necessary throughout the course of the verification.

### **Evaluate methodologies and management systems**

Cameron-Cole will review the methodologies and management systems used by SJSU to determine whether they are in conformance with the ARB GHG Reporting Rule. We will review the data collection, transcription, conversions (if applicable), assumptions (if applicable), QA/QC and recordkeeping processes to ensure they are robust. Cameron-Cole's management system review will give consideration to the following:

- Selection and management of the GHG and product data information;
- Processes for collecting, processing, consolidating and reporting GHG and product data information;
- Systems and processes that ensure the accuracy of the GHG and product data information;
- Design and maintenance of the GHG information system;
- Systems and processes that support the GHG information system;
- Results of previous assessments, if available and appropriate.

### **Data Checks**

First, Cameron-Cole will conduct activities as described in the ARB GHG Reporting Rule to verify the accuracy and completeness of activity data (i.e. verifying fuel and electricity usage) and product data. Then, using the results of previous tasks, Cameron-Cole will select calculations to verify.

### **Site Visits**

Cameron-Cole will conduct a site visit of the main Facility, in accordance with the ARB GHG Reporting Rule. During the site visit, Cameron-Cole will meet with SJSU staff and conduct interviews, examine source activity data available at the site, and conduct a site walk to confirm that all sources have been identified.

### **Recalculation**

Cameron-Cole will recalculate emissions and product data estimates for selected sources using underlying activity data (provided by SJSU). Material and immaterial errors and misstatements will be identified, and SJSU's overall covered emissions and product data estimates will be compared to our



overall covered emissions and product data estimates to determine if the materiality threshold (95% accuracy) has been achieved.

### **Findings & Cal e-GGRT Report Modifications**

After completing the recalculations and the site visit, Cameron-Cole will provide SJSU with a Findings Log. The Findings Log may include new information requests and corrective action requests. Each corrective action request will include a description of the issue, the regulatory citation and potential impact on the data and/or compliance. If corrective actions are required, Cameron-Cole will unlock the Cal e-GGRT report for editing.

If additional corrective actions are identified for the resubmitted Cal e-GGRT report, Cameron-Cole will provide SJSU with an updated findings log and unlock the Cal e-GGRT report again.

### **Verification Report, Verification Statement & Exit Meeting**

Upon completion of the verification activities described above, Cameron-Cole will prepare a Verification Report and Verification Statement for SJSU. The Verification Report will document the verification process, inventory recalculations and summarize the verification findings. A separate verification opinion will be submitted for product data.

All documents will be subjected to a quality assurance check by Cameron-Cole's independent senior reviewer. The general conclusion from the Verification Report will be used to create the Verification Statement, which will then be reviewed and signed by Cameron-Cole's independent senior reviewer and the Lead Verifier.

Originals of these documents will be provided to SJSU, and an exit meeting will be held with SJSU to discuss the verification report and statement. If material misstatements or non-conformities are found, it is understood that SJSU can revise its information, if possible, and resubmit it for review by Cameron-Cole (on an additional time-and-materials basis) until the minimum quality standard is met. SJSU can provide a copy of Cameron-Cole's Verification Statement to all interested parties and directly quote the Verification Conclusion from the Verification Statement.

## **9.0 Schedule**

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The verification schedule is as follows:

- Kick-off Meeting – 5/2/19
- Complete Verification Sampling Plan – 5/3/19
- Submit Data Request to SJSU – 5/3/19
- Submit Verification Plan to SJSU – 5/3/19
- Conduct Site Visit – 5/6/19



- Receive all requested information from SJSU – 5/10/19
- Provide Verification Findings to SJSU – 5/23/19
- SJSU addresses Verification Findings – 6/27/19
- Submit Verification Report & Verification Statement to SJSU – by 7/12/19
- Exit meeting – by 7/12/19

A handwritten signature in black ink, appearing to read 'Dru Krupinsky'.

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Dru Krupinsky            5/3/2019 (updated 7/8/19)  
Lead Verifier  
Cameron-Cole, LLC

**DCN 562 Version 1.0**


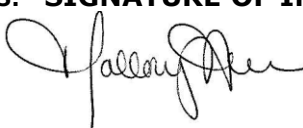
**Version Date: 10.22.18**

**Approved by: GHG Director**



## **Attachment B – Verification Statement**

**VERIFICATION STATEMENT - EMISSIONS DATA REPORT** (excluding product data)

<b>PART I. EMISSIONS DATA REPORT INFORMATION</b>	
<b>1. REPORTING YEAR:</b> 2018 data reported in 2019	
<b>PART II. VERIFICATION BODY INFORMATION</b>	
<b>1. VERIFICATION BODY NAME:</b> Cameron-Cole, LLC	
<b>Part III. REPORTING ENTITY INFORMATION</b>	
<b>1. NAME OF REPORTING ENTITY:</b> California State University, San Jose	<b>2. ARB ID NUMBER:</b> 100131
<b>Part IV. VERIFICATION STATEMENT INFORMATION</b>	
<p><b>1. This verification statement attests that the submitted data are (check one)</b></p> <p><input checked="" type="checkbox"/> reasonably assured of being free of material misstatement  <input type="checkbox"/> <b>NOT</b> reasonably assured of being free of material misstatement</p> <p><b>2. This verification statement attests that the submitted data are (check one)</b></p> <p><input checked="" type="checkbox"/> reasonably assured of being in conformance with the regulation  <input type="checkbox"/> <b>NOT</b> reasonably assured of being in conformance with the regulation  <input type="checkbox"/> <b>NOT</b> reasonably assured of being in conformance with the regulation, including <b>NOT</b> in conformance with §95131(b)(9): failure to correct data errors discovered during data checks</p> <p><b>3. As a result of the selections above, the final verification statement is (check one)</b></p> <p><input checked="" type="checkbox"/> positive: reasonably assured of no material misstatement and in conformance with the regulation  <input type="checkbox"/> qualified positive: reasonably assured of no material misstatement, but not reasonably assured in conformance with the regulation  <input type="checkbox"/> adverse: not in conformance with §95131(b)(9) and/or not reasonably assured of no material misstatement</p>	
<b>4. Qualifying Statement (required for qualified positive or adverse statements):</b> N/A	
<b>Part V. SIGNATURES</b>	
As the lead verifier for this verification, I certify under penalty of perjury under the laws of the State of California that the verification team has carried out all verification services as required by the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) (title 17, California Code of Regulations, sections 95100-95158).	
<b>1. SIGNATURE OF LEAD VERIFIER:</b> 	<b>2. PRINTED NAME:</b> H. DRU KRUPINSKY
<b>3. TITLE:</b> SENIOR STRATEGIST, SUSTAINABILITY SERVICES	<b>4. DATE:</b> 7/9/19
As the independent reviewer, I certify under penalty of perjury under the laws of the State of California that I have conducted an independent review of the verification services and findings on behalf of the verification body as required by the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR) (title 17, California Code of Regulations, sections 95100-95158), and that the findings are true, accurate and complete.	
<b>5. SIGNATURE OF INDEPENDENT REVIEWER:</b> 	<b>6. PRINTED NAME:</b> MALLORY ANDREWS
<b>7. TITLE:</b> SENIOR STRATEGIST, SUSTAINABILITY SERVICES	<b>8. DATE:</b> 7/9/19