

Wednesday, Oct. 24, 2007



New Hampshire Department of Environmental Services

[Home](#)**Air Resources****Energy Programs / Climate Change**
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[Business Center](#)
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In July 1999, Governor Shaheen signed into law the New Hampshire Greenhouse Gas Reduction Registry. This registry is intended to quantify and submit greenhouse gas (GHG) emissions reduction actions to a state database for safekeeping against some future federal requirements. This approach was developed through a collaborative of business, government, and environmental leaders to encourage early reductions in GHG emissions. Prior experience under the federal Clean Air Act Amendments of 1990 led companies to be cautious about making voluntary GHG reductions. The emission reduction requirements required by the 1990 Amendments (basically percentage cuts) effectively rewarded sources that had been dirtier or slower to clean up because they started off with more uncontrolled emissions, making percentage reductions easier to accomplish. To avoid a potentially similar catch-22 with GHG emission reductions, the NH Registry was developed to ensure to the greatest extent possible appropriate recognition of voluntary actions taken by New Hampshire businesses, industries, and individuals to reduce GHG emissions. In the event that future GHG reduction targets are implemented, the NH Registry would help New Hampshire entities establish a baseline against which future federal greenhouse gas emission reductions may apply.

Rules were recently promulgated under the New Hampshire Code of Administrative Rules, Chapter Env-A 3800 (*Voluntary Greenhouse Gas Emissions Reductions Registry*)

NH Code of Administrative Rules, see <http://www.des.state.nh.us/ard/ardrules.htm>.

The statute establishing the registry (RSA 125 L:3) can be found at State of NH Revised Statutes, see <http://gencourt.state.nh.us/rsa/html/indexes/default.html#index>.

REASONS TO REGISTER

Registering your greenhouse gas emission reductions helps:

- Protect New Hampshire entities in future regulatory regimes,
- Encourage early reductions,
- Make a positive statement,
- Support New Hampshire's high tech profile, and
- Position firms for potential international trading.

[Contact](#)

A registry is an attempt to recognize early actions to reduce greenhouse gas emissions and provide documentation that can be taken into account under a future cap trade program as described below. New Hampshire Department of Environmental Services would support recognition under any federal program.

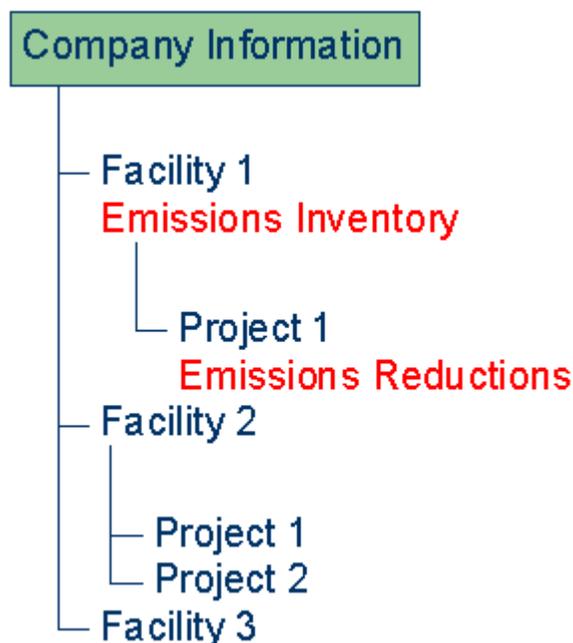
One option to controlling growth of greenhouse gas emissions is a national cap trade program similar to the acid rain program. This concept would establish a "budget" of total greenhouse gas emissions and assign "allowances" to various sectors (e.g., power generation) or individual entities. At the start of the acid rain program, sulfur dioxide allowances were assigned to entities based on their current emissions. If a company had previously reduced its emissions, it received less allowances, in essence, putting the proactive company at a competitive disadvantage to the company who made no reductions. An early action registry is intended to protect companies by establishing a baseline prior to reductions.

Taking actions to reduce greenhouse gas emissions before any mandated program (i.e., early reductions), typically results in energy savings and, consequently, reduced air emissions overall. This economic benefit can further augment a company's decision to take mitigating actions against global warming and climate change. In addition, reducing greenhouse gas emissions often involves high-tech solutions such as reducing energy use. This creates opportunities for the high tech sector in New Hampshire which boasts the highest amount per capita of high tech employees.

Lastly, if a firm is interested in positioning itself to take advantage of potential international trading of reduction credits, it is important to take the first step of quantifying reductions and registering them for public review.

REGISTRY OPTIONS

Businesses can register greenhouse gas emission reductions at three different levels: company, facility or project level.



Whole Company or Facility-Level Reporting

Whole company reporting is being encouraged as a way to establish a company baseline emissions for any future regulatory scheme. [*The Greenhouse Gas Protocol Initiative \(GHG Protocol\)*](#) provides an excellent protocol for establishing a company inventory of greenhouse gas emissions. It can also be used as a guideline for estimating facility-level emissions. The World Business Council for Sustainable Development and the World Resources Institute developed the *GHG Protocol* multi-stakeholder process with businesses, non-government organizations and governments. The *GHG Protocol* serves as a premier source of information about corporate greenhouse gas accounting and reporting.

Project-Level Reporting

However, a business, municipality, or individual may choose to only register a project that resulted in reduction of greenhouse gas emissions. In order to register a greenhouse gas reduction project, the following information must be submitted to the Department of Environmental Services for verification:

1. Describe the action that was taken to reduce greenhouse gas emissions (e.g., replacement of equipment, fuel switching, installation of co-generation,
2. Describe the quantification of baseline emissions (prior to initiation of project) and the emission reductions claimed as a result of the project. Note that baseline emissions may be calculated as one of the following:
 - o An historic baseline (preferred method) – the tons of total greenhouse gas emissions,
 - o A business-as-usual baseline – the projected emissions had the project not been initiated, or
 - o An emission rate such as the mass of greenhouse gas emissions per unit of production (e.g., lbs/MWhr – pounds per megawatt hour).

Quantification methods and tools for calculating greenhouse gas emissions are described in "[Calculating Greenhouse Gas Emissions](#)".

3. Describe the data integrity including any uncertainty in estimating the greenhouse gas emissions or emissions reductions.
4. Demonstrate that the action taken was not due to any other regulatory requirement.
5. Demonstrate that the reduction taken was "real". In other words, that it did not cause emissions to increase elsewhere or that the emission reductions were not due to a change in operations. Demonstrate that a specific action was taken and that the emission reductions would not have occurred regardless of the action taken.
6. Describe measurement and monitoring plan for recording yearly emission reductions.
7. Identify owner of emission reductions claimed.

SUBMITTAL FORMS

Forms GHG-1 and GHG-2 must be submitted with an initial registration. Form GHG-3 is used for annual renewal of greenhouse gas emission reductions. Detail project information, as described above, should be referred to in Section 1 of Form G and attached separately.

Download Forms (DOC):

[FORM GHG-1](#)

[FORM GHG-2](#)

[FORM GHG-3](#)

Contact Joseph T. Fontaine, 603-271-6794 (jfontaine@des.state.nh.us) for information about registering your reductions of greenhouse gas emissions.

Related Websites:

[NH Code of Administrative Rules](#)

[State of NH Revised Statutes](#)

[Northeast States for Coordinated Air Use Management](#)

[Voluntary Reporting of Greenhouse Gas \(1605B\)](#)

[AirHead : Emissions Calculator](#)

[Bonneville Environmental Foundation - Renewable Energy](#)

[Climate Change News and Actions by SafeClimate | calculator](#)

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