



Proposal to Provide:
Mandatory Reporting Regulation Verification Services
City of Needles
(RY 2025 – RY 2027 Data Reports)
(ARB ID#: 3047)



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A. COVER LETTER

Lincus, Inc. (“Lincus”) is pleased to respond to City of Needles (“Reporter”) request for a proposal for Greenhouse Gas Emissions verification services for reporting years 2025 to 2027 data reports under the Mandatory Reporting Regulation administered by the California Air Resources Board. It is Lincus’ understanding that City of Needles is responsible for submitting emissions reports for the following reporting entity.

Reporting Entity	ARB ID#	Industry Sector
City of Needles - EPE	3047	Electricity Transactions

Lincus is an ARB-accredited greenhouse gas verification body under Executive Order H-22-021. The Lincus team has experience in providing GHG verification and consulting services to over two hundred electricity transactions, electricity generation, cogeneration, and stationary combustion facilities. Lincus also has a 100% track record of completing verification services before the ARB deadline and passing ARB audits for all selected projects with no/minimal comments.

The complete proposal, including the scope, verification cost, and schedule is attached for your review.

Thank You,

Ramanujan Vetrivel

Project Manager & ARB Lead Verifier

B. COMPANY INFORMATION

As a CPUC Clearinghouse certified **Women Business Enterprise (“WBE”)**, Lincus serves its customers from four offices – Monrovia and San Francisco, California; Tulsa, Oklahoma; and Tempe, Arizona. Established in 2003, Lincus specializes in providing energy, carbon management, and information solutions to a client base that spans the commercial, industrial, governmental, utility, and design communities. Lincus is one of the very few companies in the United States which are accredited by the California Air Resource Board (ARB), Oregon DEQ, and Washington’s Department of Ecology to provide Greenhouse Gas (GHG) verification services. Our decarbonization services also include Low Carbon Fuel Standard (LCFS), Carbon Disclosure Project (CDP) reporting & verification, along with developing strategies for Building Electrification, Distributed Energy Resources, and EV infrastructure evaluation.

We have a total of six accredited lead and general verifiers who have successfully completed the ARB training and exam for general stationary combustion with three accredited for transactions and one for the oil & gas market sector. Our GHG verification services are conducted exclusively by ARB-accredited verifiers. Our clients have benefitted from our deep knowledge and understanding of the reporting and verification process. In assisting its customers, *Lincus* aims to provide individual attention to each GHG reporting or verification project along with excellent customer service. The table below shows the list of Lincus’ accredited GHG verifiers under MRR.

Verifier Name (EO#)	ARB Accredited	Lead Verifier	Stationary Combustion	Oil and Gas	Transactions
Hob Issa (H-24-049)	✓	✓	✓		
Yeshpal Gupta (H-24-043)	✓	✓	✓	✓	✓
Cristalle Mauleon (H-24-122)	✓	✓	✓		✓
Ramanujan Vetrivel (H-23-021)	✓	✓	✓		✓
Alyza Khan (H-24-175)	✓		✓		
Grecia Hernandez (H-24-166)	✓		✓		

The following picture and description provide *Lincus*’ overall services and capabilities.



Carbon Management Solutions

GHG Validation/Verification, Carbon Disclosure Project, Low Carbon Fuel Standard, Decarbonization strategies, Building Electrification, etc.

Energy Engineering

Strategic Energy Planning, Energy Simulation, ASHRAE Audits, Performance Contract Evaluation and Support, CX and RCx, M&V, New Construction Review and Compliance, Demand Response, and Smart Grid Integration

Program Design and Management

Prescriptive and Custom Program Development and Support; and Comprehensive Program Development (upstream, midstream, and downstream)

Software Solutions

Program Management Software, Commercial Energy Auditor, PM Tool, GGA Analyzer, Home Energy and Carbon Analyzer, Lighting Calculator, and Power Pledge

Evaluation Monitoring and Verification

Market Potential Studies, Program Process and Impact Evaluations, and EM&V Studies

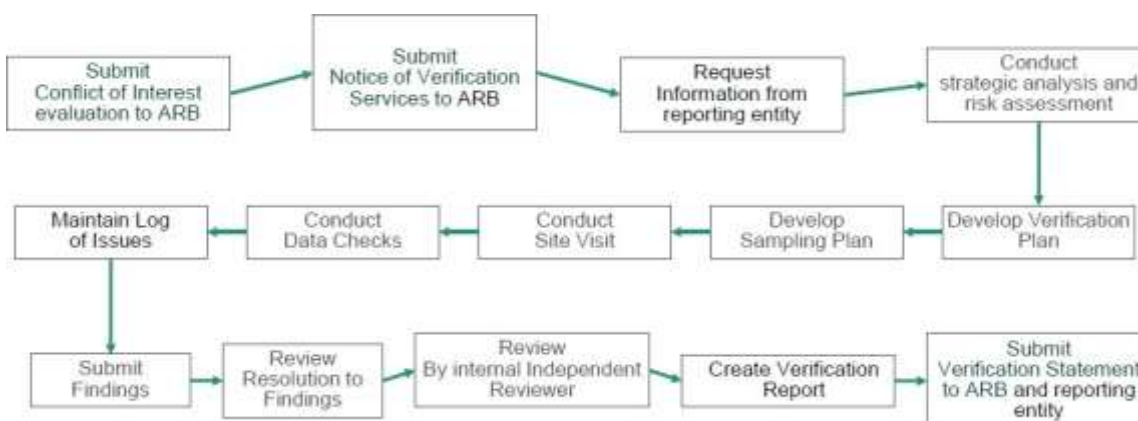
C. STATEMENT OF UNDERSTANDING AND APPROACH

c.1 Lincus' Work Plan

The purposes of the GHG verification exercise are, by review of objective evidence, to independently verify that the submitted emissions data reports are:

- Free of material misstatement; and
- In full conformance with the requirements of the Regulation.

Lincus' verification team follows a very well defined and tested approach to achieve these objectives. The diagram below shows the key steps in the verification process.



Here is the detailed description of various tasks involved in the verification process:

Task 1: COI/NOVS Evaluation – Prior to beginning any verification project, *Lincus* conducts an evaluation to identify any potential conflicts of interest (COI) as per the guidelines provided in the regulation section 95133. The *Reporter* may be asked to provide emissions information to *Lincus* in order to proceed with this evaluation. Once *Lincus*' internal review is completed and approved for the verification services, *Lincus* will assign a Lead Verifier to coordinate various verification activities. The Lead Verifier will then select other verification team members based on their expertise. The lead verifier will have operational control over the verification team and will be the primary point of contact for all verification activities. After completion of the internal COI evaluation, *Lincus* will submit a COI form and a Notice of Verification Service (NOVS) form to ARB for each facility. After CARB approves the COI and NOVS, *Lincus* will begin verification services for the *Reporter*.

Task 2: Project Kickoff and Information Request – After receiving ARB’s approval, a kick-off meeting (or a conference call) with the *Reporter* will be held to discuss the scope of verification, and considerations for the verification including but not limited to verification activities, verification schedule, site access clearance/safety issues, and other applicable project details. *Lincus* will also request a point-of-contact to coordinate and follow up for information during verification. Copies of emissions-related information for the verification year, including a copy of the GHG monitoring plan, will also be requested to develop a complete understanding of the facility. Based on the reported transactions, the following documents and information will be required, at a minimum, to conduct the necessary document and data reviews:

- GHG monitoring/inventory plan
- Details of all transactions and calculations
- Sample NERC e-tags
- Accounting reports
- Lesser of analysis for applicable Sources
- Power contracts
- RECs tracking

Task 3: Verification Plan Development – Once the information outlined in Task 2 is obtained, *Lincus* will conduct strategic analysis and risk assessment based on the received data in concert with information regarding the Reporter’s operation to formally document the Verification Plan. The Verification Plan will include dates of proposed meetings and site visits; a list of personnel to be interviewed; a list and types of document and data reviews; and an expected date for completing verification services.

Task 4: Sampling Plan Development – In this task, the verification team will develop a Sampling Plan based on a strategic analysis developed from initial document reviews and update the plan after conducting the site visit described in Task 5. The Sampling Plan will be created to assess the likely nature, scale, and complexity of the verification services and shows how the verifier plans to get to reasonable assurance with the submitted report. The Sampling Plan will also address the three types of uncertainty risk (inherent, control, and detection), and assesses the potential level of risk. The sampling plan will include:

1. Ranking of all emission sources by magnitude on a CO₂e (Carbon Dioxide equivalent) basis;

2. Ranking of emission sources with the largest calculation uncertainty
3. Qualitative description of uncertainty risk assessment of
 - Data acquisition equipment
 - Data sampling and frequency
 - Data processing and tracking
 - Emission calculations
 - Data reporting
 - Management policies or practices in developing emission data reports

Task 5: Site visit – Once the verification plan is complete and agreed upon, in-person site visits will be scheduled/conducted to verify the facility’s emission sources, data management systems, and to interview personnel associated with their GHG emission program. Facility visits for each facility undergoing full verification are mandatory per AB 32 regulations. During less intensive verification years, online meetings will be held in lieu of the in-person site visit. During the site visit, Lincus will inspect facility operations, emissions-related documentation, data management systems, and other areas. The verification team will also interview key personnel involved in recording, storing, managing, and generating reports related to emissions reporting. Every effort will be made to schedule interviews with key personnel to minimize disruption to facility operations. Depending upon the pre-site visit data provided by the facility, Lincus verifiers will survey the facility for data gathering, inspection, and interview of various facility personnel. Project status updates and follow-up site visits (if necessary) will be coordinated through the Lincus Lead Verifier assigned to that facility.

Task 6: Compliance Assessment/Data Checks – Based on the sampling plan, the verification team will conduct a thorough review of the *Reporter’s* submitted data to verify compliance with the regulation. The verification team will also verify the *Reporter’s* compliance with other non-data-driven portions of the regulation as specified in regulation sections 95103 to 95109. In essence, the verification team will verify that the submitted emission data report is “free of

material misstatement” and is in “full conformance with the requirements of regulation”. In some cases, the verification team may re-create a part of the emission calculations to verify its accuracy. If required, the lead verifier may request additional documentation and/or explanations. If any errors/issues are found in the emission data report, the verification team will provide an Issues Log to the *Reporter* via email. The reporter will be provided up to ten business days to address the Issues Log. At the end of this step, the verification team will revise the sampling plan to describe in detail how the identified risks were addressed during verification.

Task 7: Internal Quality Control – Once the compliance assessment process is completed and the verification team makes a recommendation, all documentation will be submitted to independent Lead Verifier. The Independent Lead Verifier’s role is to ensure that all verification procedures have been properly followed and that the conclusions are well-supported. The Independent Lead Verifier will then decide to either approve or reject the verification team’s recommendation. In the case of rejection, the Verification Team will address the issues identified by the Independent Lead Verifier and resubmit.

Task 8: Verification Report & Verification Opinion – As an outcome of the verification process, *Lincus* will provide to the *Reporter*, a detailed verification report for each site. The verification report will include the verification plan, the detailed comparison of the data checks with the submitted emission data report, the log of issues identified in the course of verification activities and their resolution, and any qualifying comments on findings during verification services. The verification team will also provide a verification opinion to the *Reporter*. In the event of an adverse verification opinion, the *Reporter* will be provided at least ten working days to modify the emission data report to correct any material misstatement or nonconformance found by the verification team, per regulation section 95131(c)(4). If needed, Lincus verification team will conduct a meeting (online) to discuss the verification report and opinion with the *Reporter* staff. Once all issues are addressed and prior to the verification deadline, *Lincus* will submit the verification opinion to ARB (through Cale-GGRT) and a final copy of the verification report and verification opinion to the *Reporter* no later than by the ARB verification deadline for each year or mutually agreed upon date.

D. PROJECT SCHEDULE AND COST ESTIMATE

d.1 Project Schedule

Lincus proposes to complete the verification activities anywhere between 6-8 weeks after receiving a notice to proceed and certification of emissions data report on the Cal-eGGRT website. Verification activities are assumed to start no later than the reporting deadline of June 1st (or next business day) for power transactions but can be started as soon as reports are certified in Cal-eGGRT. *Lincus* is committed to completing all verifications on/before the ARB verification deadline for each year or mutually agreed upon date assuming a timely response from the Reporter to the Issues Log (maximum 10 business days). The Table below shows a tentative timeframe (in business days) for each task to be followed for this verification services.

Verification Tasks	Estimated Timeframe (business days)
Task 1: COI/NOVS Evaluation*	5 Days
Task 2: Project Kickoff and Coordination	1 Day
Task 3: Verification Plan Development	3 Days
Task 4: Sampling Plan Development	5 Days
Task 5: Site Visit	3 Days
Task 6: Compliance Assessment	5-10 Days
Task 7: Internal Quality Control	3 Days
Task 8: Verification Report & Verification Opinion**	5 - 10 Days*
Total	30 – 40 Days

*COI/NOVS will be completed before the submission of the emissions data report.

**Adverse opinion requires a minimum of ten days of notice to the Reporter.

d.2 Budget Estimate

The following fixed cost estimate has been prepared based on the GHG verification process outlined earlier in this document, as well as our understanding of transactions sources (including Specified Imports – primarily from EIM, Unspecified Imports, and Unspecified Exports). The scope of work for each task is detailed in the proposal. *Costs cover the review of one set of revisions to the submitted data report. Reviews of any additional revisions will be billed on a time and materials basis.*

Task Description	RY 2025 Cost	RY 2026	RY 2027
Task 1: COI/NOVS Evaluation	\$216	\$222	\$229
Task 2: Project Kickoff and Coordination	\$432	\$444	\$458
Task 3: Verification Plan Development	\$864	\$888	\$916
Task 4: Sampling Plan Development	\$1,080	\$1,110	\$1,145
Task 5: Site Visit	\$1,296	\$666	\$1,374
Task 6: Compliance Assessment	\$3,456	\$3,552	\$3,664
Task 7: Internal Quality Control	\$432	\$444	\$458
Task 8: Verification Report & Verification Opinion	\$864	\$888	\$916
Total Price	\$8,640	\$8,214	\$9,160

** Virtual site visits will be conducted during the expected less-intensive verification for RY 2026.*

Work Not Included In This Proposal

This section includes the work not included in this proposal and additional reimbursable expenses (if applicable).

1. Additional site visits, presentations, meetings times outside this Scope of Work, if required, will be billed at \$216/hr for RY 2025 data, \$222/hr for RY 2026 data, and \$229/hr for RY 2027 data.
2. More detailed verification services that exceed the standard set forth in MRR
3. Any work not specifically included in Tasks 1 through 8 (above)
4. Any verification work for the following verification years other than the years specified in this scope of work.

E. INVOICING

Lincus will submit invoices after the site visit and after verification completion, as outlined in the Table below. The Reporter shall make payment net 30 days after receipt of an invoice.

Milestone	% of the Contract Amount	RY 2025	RY 2026	RY 2027
After Site Visit	50.00%	\$4,320.00	\$4,107.00	\$4,580.00
After Verification Completion	50.00%	\$4,320.00	\$4,107.00	\$4,580.00
Total	100.00%	\$8,640.00	\$8,214.00	\$9,160.00

Terms and Conditions

1. If the above-stated terms are agreeable, please sign and return one copy of this proposal to our office. If this agreement is not signed and returned and we are asked to proceed with the project, all conditions contained herein shall constitute a contract for services. *Lincus* reserves the right to revise the fee stated herein if not accepted within a period of 30 days from the date of the proposal.
2. Your acceptance below will represent an agreement between us for MRR verification services for the facilities noted above. Any changes made to this agreement shall be initiated by both *Lincus* and the Reporter.

Thank you for the opportunity to offer our services.

Sincerely Yours,

Ramanujan Vetrivel, Project Manager & Accredited Lead Verifier

ACCEPTED By: City of Needles (Reporter)

Authorized Person Name

Authorized Person Title

Authorized Person Signature

Date Signed

Appendix A: MRR Verification References

Customer Name	Report Types	Reporting Years Verified	Contact Person
Pasadena Water & Power	Power Generation, Electricity Transactions	2018 - 2023	Christina Schieber Email: cschieber@cityofpasadena.net
City of Azusa	Electricity Transactions	2017 - 2022	Tim Vuong Ph: 626-812-5015 Email: tvuong@azusaca.gov
Calpine Corporation	Power Generation, Electricity Transactions, Fuel Supplier	2022 - 2023	Betty Chu Ph: (530) 821-5321 Email: betty.chu@calpine.com
OLS Energy	Power Generation	2016 - 2021	Steve Bean Ph: 909-597-0338 sbean@olsenergy.com
Los Angeles Department of Water & Power	Power Generation, Electricity Transactions	2017 - 2020	Cindy Parsons Ph: 213-367-0636 Email: Cindy.Parsons@ladwp.com