

Memorandum

November 18, 2025

Subject: Clarification on Benchmark Reference Years Retention for Re-Enrolled Aggregate Facilities under TIER

Dear Stakeholders,

Further to the October 30, 2025 Conventional Oil and Gas webinar, the Climate Regulation and Carbon Markets Branch is providing the following clarification and assurance regarding benchmark reference years retention for aggregate facilities under the Technology Innovation and Emissions Reduction (TIER) Regulation:

Voluntary Opt-Out and Re-Enrollment Flexibility for 2026

Companies that choose to submit partial or full-year reporting for 2025 and require additional time to understand the 2026 benchmarking approach for TIER aggregate facilities, may opt out of the TIER aggregate program by **December 1, 2025**, to support informed decision-making for the 2026 compliance year.

Opting out for 2026 allows operators to avoid unintended consequences associated with being required to report on all facilities remaining in the aggregate for 2026, without sufficient time to forecast compliance outcomes ahead of the December 1, 2025 opt-out deadline. Opt-out submissions may be made using the form previously distributed to aggregate facility stakeholders.

Companies may **re-enroll** in the TIER aggregate program by the **enrollment deadline** for 2026 reporting, or in a subsequent year. This flexibility supports thoughtful participation decisions. Subject to the conditions outlined below, previously established **benchmark reference years may be retained**. This assurance enables facilities to take the time needed for analysis without forfeiting continuity in benchmarking, where appropriate.

The **deadline** for 2026 enrollment, including addition of facilities or creation of a new aggregate facility, and re-enrollment is **November 15, 2026**.

Benchmark Reference Years Retention Upon Re-Enrollment

Aggregate facilities that opt out of the TIER aggregate program for the 2026 compliance year—and are subsequently re-enrolled—may retain their previously established benchmark reference years, provided that:

- The composition of the re-enrolled aggregate facility is identical to, or
- A subset of, the previously opted-out aggregate facility.

In cases where the re-enrolled aggregate includes new facilities that were not part of the original configuration, the department may assess the suitability of retaining the original benchmark reference years. This assessment will be based on correlation analysis, taking into account the composition, configuration, and emissions characteristics of the new aggregate.

- If the analysis indicates a similar level of correlation strength, the prior benchmark reference years may still be retained.
- However, if the analysis shows a weaker correlation and identifies more appropriate benchmark reference years for the new aggregate composition, the original reference years may not be retained.

Please direct any questions you may have to EPA.GHG@gov.ab.ca.

Sincerely,

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