

# CFP Fuel Pathways / 3PV Workshop

## Clean Fuels Program

March 3, 2022, 2–3 p.m. and  
March 4, 2022, 10–11 a.m.

# Overview

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- Annual Fuel Pathway Report (AFPR) and Third Party Verification for AFPR
- Third Party Verification for AFPR – for Certified Pathways and Recertified Pathways
- Forms for the Third Party Verification program in Oregon
- Oregon Fuels Reporting System - Alternative Fuels Portal

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# **Annual Fuel Pathway Report (AFPR) and Third Party Verification of the AFPR**

# Annual Fuel Pathway Report (AFPR) Requirements

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## **OAR 340-253-0450**

**An Annual Fuel Pathway Report is required** for all fuel pathways certified under the CFP

**DUE** no later than March 31 of each calendar year

**MUST** include the certified version of the simplified OR-GREET or full OR-GREET calculator, or other as applicable, with the most recent two years of operating data

- Any temporal or other data submitted to support low-CI process energy
- Any other specifics defined in the operating conditions **MUST** be submitted with the AFPR
- Holders of certified fuel pathways that **supplied site-specific CI data** for pathway certification and are required to update site-specific CI data on an annual basis

# Annual Fuel Pathway Report (AFPR) Requirements *cont.*

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## IN ADDITION,

- Specified source feedstock suppliers and other persons with site-specific CI data that apply for separate **DEQ recognition as a joint applicant** under OAR chapter 340, division 253 and elect to be responsible for separate verification.

# Annual Fuel Pathway Report (AFPR) Requirements *cont.*

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**NOTE:** For renewable electricity and hydrogen lookup table pathways

- The pathway holder must include invoices or metering records substantiating the quantity of renewable or low-CI inputs procured from a qualifying source (this information is submitted *in lieu of the CI calculator*)
- Also, any records for RECs retired in WREGIS or another comparable REC tracking system **MUST** be submitted
  - Reference: <https://www.oregon.gov/deq/ghgp/Documents/cfpRetiringRECs.pdf>

# Annual Fuel Pathway Report (AFPR) Requirements *cont.*

- If the verified operational CI as calculated from the operational data covering the prior two calendar years of production is found to be lower than the certified CI and a positive verification statement is issued for this period
  - The fuel pathway holder may elect to keep the original certified CI **or** may request to replace the certified CI with the verified operational CI.
    - The pathway holder may elect to add a margin of safety to the new certified CI, and
    - Must submit an attestation that the new CI can be maintained through the next reporting period with the acknowledgment that exceeding the newly certified CI in subsequent annual reports or verifications is a violation of the requirements of this division
- If the operational CI is found to be greater than the certified CI,
  - The fuel pathway holder is out of compliance with this division and may be subject to investigation and enforcement by DEQ
- **Additional information on annual fuel pathway reports:**  
<https://www.oregon.gov/deq/aq/Documents/FuelPathwayReports.pdf>

# Third Party Verification of the Annual Fuel Pathway Report (AFPR)

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**Pathway holders MUST have their annual fuel pathway report verified** unless they do not generate  $\geq 6,000$  credits and deficits during the previous calendar year for the quantity of fuel produced at a given facility.

Note: This threshold limit is assessed at the facility level, not at the pathway level.

**REMINDER:** Quarterly review of the AFPR data is not required unless the fuel pathway holder is required to submit data quarterly on the operational CI to the CFP (OAR 340-272-0110 (2)(c)(A)).

# Timeline Considerations

- Annual Fuel Pathway Report is due by March 31
- The 3PV verification/verification statement must be complete by August 31
  - **Recertification pathways have 10 days from submission to CARB to submit their verification statement to DEQ**
- Any changes to the fuel pathway code and associated fuel pathway code carbon intensity value, as an effect of the AFPR and/or verification processes, will be active for reporting fuel transactions in Q1 of the following year.
  - For example, AFPRs due March 31, 2022, with verification statements submitted by Aug. 31, 2022, will have any changes to FPCs and /or associated CIs will be active for Q1 2023.

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**QUESTIONS/COMMENTS?**

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# Certified Pathways vs. Recertified Pathways

# Certified pathways vs. recertified pathways

“**Fuel pathway**” includes all stages of fuel production and use for transportation fuel, including feedstock generation or extraction, production, distribution, and combustion of the fuel by the consumer.

The materials submitted in the fuel pathway application are used to calculate the carbon intensity of each transportation fuel.

**Certified pathway** – a fuel pathway certified under the Oregon DEQ’s Clean Fuels Program

**Recertified pathway** – a fuel pathway initially certified under CARB’s LCFS.

Fuel pathway holders that want to transport the fuel to both California and Oregon must submit a fuel pathway application for the fuel pathway certified under the CARB’s LCFS to be reviewed for potential certification under Oregon DEQ’s CFP.

# Third Party Verification of AFPRs for certification and recertification pathways

The third party verification statement form for certification and recertification pathways are the same.

**The differences** for the recertification pathways:

1. Requirement to submit the AFPR and verification statement within **10 days** of submitting the same to CARB.
2. If differences in the facility's pathways under the DEQ CFP need to be verified, submit the **designated Oregon DEQ CFP 3PV verification statement** and append the CARB verification report.

**Reminder:** The **responsible entity** submits the verification statement(s) for the recertification pathways (OAR 340-272-0110(2)(c)(B)).

# What documentation must be submitted to DEQ in the case of recertified California fuel pathways?

For re-certification pathways and facilities that have positive verification statements generated from the CARB verification process and there are **no differences** in Oregon for their pathways at the facility level, they **do not** need to go through further verification in Oregon.

In this case:

1. The responsible entity must submit their Annual Fuel Pathway Reports by March 31.
2. Within ten days of submitting their verification statement to CARB, they must submit the same to Oregon DEQ CFP.
3. The responsible entity does not need to submit the Oregon verification form. They are not subject to the COI review in Oregon.
4. For re-certification pathways and facilities that have positive verification statements generated from the CARB verification process and there **are differences** in Oregon for their pathways at the facility level, they **do need** to go through further verification in Oregon.

In this case:

1. The responsible entity must submit their Annual Fuel Pathway Reports by March 31.
2. Within ten days of submitting their verification statement to CARB, they must submit the same to Oregon DEQ CFP.
3. The responsible entity does need to submit the Oregon verification statement form. There is a section on this form that they must completed. They are subject to the COI review in Oregon, etc.
4. The responsible entity does need to submit the Oregon verification statement form. There is a section on this form that they must completed. They are subject to the COI review in Oregon, etc.
5. **Differences** refers specifically to the following: The responsible party is subject to third party verification requirements for re-certified pathways if adjustments other than transportation distances are made to the established fuel pathway that CARB certified, and that includes transportation mode(s) and mileage(s) previously reviewed and certified by DEQ.

# Documentation for certification and recertification pathways

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**Important notes** about pathways with deferred verification under CARB's LCFS:

- For facilities that generate  $\leq 6,000$  credits per year, the California pathways need to be verified every three years. Facilities that generate  $\geq 6,000$  credits per year need to undergo annual verification (same as in Oregon's DEQ CFP).
- However, if a facility generates  $\leq 6,000$  credits per year in California BUT  $\geq 6,000$  credits in Oregon, the facility still must go through annual verification in Oregon and is not allowed to defer verification in Oregon.

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**QUESTIONS/COMMENTS?**

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# Third Party Verification Program Documentation

# Third Party Verification Program Documentation

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**ALL verification statement forms and other templates and documents will be available on the third party verification website:**

<https://www.oregon.gov/deq/ghgp/3pv/Pages/default.aspx>

## **Important reminder:**

The responsible entity has the ultimate responsibility for making sure the verification services completed on its behalf conform with our rules and is responsible for submitting the verification-related documents.

# Designated Oregon DEQ CFP 3PV Verification Statement



State of Oregon Department of Environmental Quality

## Third Party Verification Statement Clean Fuels Program



See full provided instructions for this form on Page 4.

### Part 1: Responsible entity information

Responsible entity:	
Data year:	
Report type:	
Facility name (if applicable):	
CFP ID (if applicable):	
FEIN number (if applicable):	

### Part 2: Verification body information

Verification body name:	
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### Part 3: Re-certification pathway(s) ONLY

If this verification statement is not for re-certification pathway(s), skip to Part 4.



# Documents for Oregon DEQ CFP 3PV Verification

The 3PV verification statements/reports processed through the CARB LCFS **can be submitted** to the Oregon DEQ Clean Fuels Program for the facilities under the CFP subject to verification and all pathways recertified for that facility in Oregon.

## Important reminders:

Although the Oregon fuel pathways are similar to fuel pathways previously certified under CARB's LCFS, there are differences between the CFP and CARB LCFS registered fuel producer facilities' fuel pathways.

Differences may include pathways, transportation mode or mileage, operating conditions, etc.

Those differences will need to be reviewed by CFP staff and are subject to verification by a 3PV body.

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**QUESTIONS/COMMENTS?**

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# **Oregon Fuels Reporting System (OFRS) Alternative Fuel Portal (AFP)**

# Oregon DEQ's CFP OFRS – Alternative Fuel Portal

[Contact Us](#) [Sign out](#)

Home Producer Profile FPC **My Facilities** Registered Facilities Reports

Welcome: AFP TEST AFP TEST for Test Account - AFP

## Fuel Producer Company Facilities

Fuel Producer Company: Test Account - AFP  
Company ID: C1006

	Facility Name	Facility ID	Address	Geographic Coordinates	UTM Coordinates	Facility Contact Details	Fuel Pathway Applications	Verification Body
>	[Redacted]						<a href="#">View Pathways</a>	<a href="#">Assign VB</a>

Next step



# Oregon DEQ's CFP OFRS – Alternative Fuel Portal *cont.*

**AFP TEST**

Producer: Test Account - AFP      Facility: AFP TEST  
Company ID: C1006      Facility ID: E5000

Start New Application:  **GO**

App No.	Application Type	No. of Joint Applicants	No. of Pathways	Application Status	Provisional	Assigned To	Last Modified	Modified By	Documents	History	Details	Delete
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>				

There are no records to display

Next step



**LCFS Pathway Application**

Fuel Producer: Test Account - AFP      Facility Name: AFP TEST  
Company ID: C1006      Facility ID: E5000

**Tier 1 Pathway** Application #

**INSTRUCTIONS**

- Applicant is choosing not to have this pathway verified prior to certification of this pathway.
- This application is for recertification of a currently-approved pathway (or pathways) under the California LCFS
- This application contains joint applicants
- This application contains multiple pathways
- This is a provisional application.  
(If application contains multiple pathways, each pathway will be provisional)

**Templates and Calculators**

- [General Attestation Letter](#)
- [Biomethane/Biogas AFP Attestation Letter](#)
- [Simplified CI and OR-GREET Calculators](#)

**Back**      **Cancel**      **Next**

Next step



# Oregon DEQ's CFP OFRS – Alternative Fuel Portal *cont.*

**LCFS Pathway Application**

Fuel Producer: Test Account - AFP	Facility Name: AFP TEST
Company ID: C1006	Facility ID: E5000

**Tier 1 Pathway** Application #

**Fuel Pathways** [+ Add Pathway](#)

Pathway Number	Fuel Type	FeedStock	Applied Pathway Description	Applied CI (gCO2e/MJ)	Delete	Details
No records to display.						

Next step

**Pathway Details**

Fuel Type:

Feedstock:

Pathway Description:\*

(Max:500)

Applied CI Value:

Direct Emission (CI) (gCO2e/MJ):\*

Indirect Emission (CI)(If any) (gCO2e/MJ):

Total CI Value:

\* REQUIRED

Insert a comment to note  
"This is an Annual fuel  
pathway report"

Next step

# Oregon DEQ's CFP OFRS – Alternative Fuel Portal *cont.*

Fuel Producer: Test Account - AFP  
Company ID: C1006

Facility Name: AFP TEST  
Facility ID: E5000

**Tier 1 Pathway** Application #

**Fuel Pathways**

Pathway Number	Fuel Type	FeedStock	Applied Pathway Description	Applied CI (gCO2e/MJ)	Delete	Details
	Ethanol	Corn	TEST	45.00	X	Edit

Back Cancel **Next**

Fuel Producer: Test Account - AFP  
Company ID: C1006

Facility Name: AFP TEST  
Facility ID: E5000

**Tier 1 Pathway** Application #

**Pathway Documents**

Document Type	Document Name	Description	Date	Download	Delete
No records to display.					

Back Cancel [+ Add File](#)

**Pathway Documents** [+ Add File](#)

Document Type	Document Name	Description	Date	Download	Delete
Pathway Calculator (Simplified CI Calculators OR-GREET 3.0)	Part80FuelsProgramsList.xls		01/28/2022	↓	X
Attestation Letter	340-253-8010.pdf		01/28/2022	↓	X
Annual Fuel Pathway Report	340-253-8010.pdf		01/28/2022	↓	X

Cancel **Save Application** **Submit**

**Upload Document**

The required files marked below are baseline or minimum requirements for this application. They do not include pathway supporting documents, which can vary depending on the type of application. Refer to the requirements for the Fuel Pathway Applications under OAR 340-253-0450.

File Name:\* Choose File 340-253-8010.pdf

File or Document Type:\* Select...

Remarks: **Annual Fuel Pathway Report**

\* REQUIRED

Close Upload Document

Document Type	File Name	Description	Download	Delete
No records to display.				

# Oregon DEQ's CFP OFRS – Alternative Fuel Portal Correspondence Tab



Example uses for the correspondence tab

- Request for additional information
- Review of CFP staff summary
- Etc.

Email general questions about fuel pathways to the Oregon Clean Fuels inbox and CFP staff:

[oregoncleanfuels@deq.oregon.gov](mailto:oregoncleanfuels@deq.oregon.gov)

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**QUESTIONS/COMMENTS?**

# Resources

Oregon Clean Fuels Program:

<https://www.oregon.gov/deq/ghgp/cfp/Pages/default.aspx>

All Fuel Pathways Reference Materials & Alternative Fuel Portal:

<https://www.oregon.gov/deq/ghgp/cfp/Pages/Clean-Fuel-Pathways.aspx>

Third Party Verification Program:

<https://www.oregon.gov/deq/ghgp/3pv/Pages/default.aspx>

Information for Responsible Entities

<https://www.oregon.gov/deq/ghgp/3pv/Pages/CFP3PartyEntities.aspx>

# Contacts

Oregon Clean Fuels Program:

[oregoncleanfuels@deq.oregon.gov](mailto:oregoncleanfuels@deq.oregon.gov)

Third Party Verification Program:

[3pverify@deq.oregon.gov](mailto:3pverify@deq.oregon.gov)