



# Annual Fuel Pathway Reporting and Verification

## Oregon Third Party Verification Program

# Purpose

This presentation is intended to provide holders of fuel pathways under the Oregon Clean Fuels Program with important information about reporting and verifying their pathways in Oregon.

The information in this presentation is not intended to supersede DEQ regulatory requirements. If information presented here conflicts, the regulation takes precedence.

# Agenda

- Fuel pathway type descriptions
- Reporting and verification requirements by fuel pathway type
- Timing and deadlines
- Reference materials
- Contacts

# Provisional Certification Pathways

Provisional fuel pathways are pathways initially certified in Oregon based on at least three months of fuel production facility's operational data submitted in the CI calculator.

The full 24 months of operational data may not be included in provisional pathway AFPRs.

# Non-provisional Certification Pathways

Non-provisional fuel pathways are pathways initially certified in Oregon, based on 24 months of a fuel production facility's operational data submitted in the CI calculator.

The Annual Fuel Pathway Reports associated with the facility's fuel pathway(s) must contain the most recent 24 months of operational data.

# Recertification Pathways

Recertification pathways are fuel pathways initially certified under the California Air Resources Board's Low Carbon Fuel Standards program, for which the fuel pathway holder would like to transport the fuel to Oregon.

These pathway holders must submit the CA-GREET model and have a choice to use the CA- or OR-GREET model for certification under the CFP.

They must also submit the final version of CARB's staff summary with all operating conditions, all pertinent supporting information, and the validation report.

Previously CARB certified provisional and non-provisional pathways can be submitted as recertification pathways under the CFP.

# General Annual Fuel Pathway Report Requirements

AFPR requirements are contained in OAR 340-253-0450.

An Annual Fuel Pathway Report is required for ALL fuel pathways certified under the CFP.

Annual Fuel Pathway Reports are due no later than March 31 of each calendar year.

The following slides contain specific reporting and verification requirements for Provisional, Non-Provisional, and Recertification pathways.

# Additional AFPR Requirements

## For all types of pathways:

- For renewable electricity and hydrogen lookup table pathways, the pathway holder must submit invoices or metering records confirming the quantity of renewable or low-CI inputs obtained from a qualifying source. This information is submitted in place of the CI calculator.
- Additionally, records for Renewable Energy Credits retired in the Western Renewable Energy Generation Information System or another comparable REC tracking system must be submitted.

# Reporting for Non-provisional and Provisional Pathways

Fuel pathway holders are required to submit the following in their AFPR by March 31:

- The certified version of the simplified OR-GREET, CA-GREET, or full OR-GREET calculator, or other as applicable, with the most recent two years (24 months) of operating data.
- All details specified in the operating conditions.
- Fuel pathway holders who supplied site-specific data for pathway certification must annually update this site-specific CI data.
- Source feedstock suppliers specified in the operating conditions, along with other individuals possessing site-specific CI data, may apply for separate DEQ recognition as joint applicants under OAR Chapter 340, Division 253. They can choose to be individually responsible for verification.

# Verification for Non-provisional and Provisional Pathways

**Verification threshold requirement:** Facilities with non-provisional or provisional fuel pathways that generate 6,000 credits and deficits per year under the CFP must undergo annual third-party verification in Oregon.

**Verification deadline:** August 31

**Conflict of interest for non-provisional and provisional pathways:** Complete COI disclosure prior to the start of verification activities.

# Verification of Recertification Pathways (1 of 2)

## Verification threshold requirement:

- For facilities that generate fewer than or equal to 6,000 credits per year under CARB's LCFS and CFP, the LCFS fuel pathways need to be third-party verified every three years under CARB's verification program.
- Facilities that generate greater than 6,000 credits per year must undergo annual third-party verification for CARB's LCFS. That verification statement can be provided to DEQ in lieu of going through a separate CFP verification.
- However, if a facility generates fewer than 6,000 credits per year under CARB's LCFS but 6,000 or more credits in CFP, the facility must still undergo annual third-party verification in Oregon.

# Verification of Recertification Pathways (2 of 2)

## Deadlines:

- Fuel pathway holders are required to submit the CA AFPR and OR AFPR by **March 31**.
- Submit the CARB verification statement and CA AFPR to Oregon CFP within 10 days of submitting it to CARB.

**Conflict of Interest for recertification pathways:** If you have a recertification pathway subject to 3PV under the Oregon CFP, the fuel pathway holder must submit a COI disclosure to DEQ.

# Recap: Certification vs. Recertification Pathways

## Certification Fuel Pathways

(Provisional and Non-Provisional fuel pathways not previously certified outside of Oregon):

1. Submit the CA-GREET AFPR by March 31.
2. Must be third-party verified if the pathway generates 6,000 combined credits/deficits or greater
3. Hire a DEQ approved verification body
4. Complete conflict of interest disclosure prior to the start of verification activities
5. Submit Oregon CFP verification statement and report to Oregon CFP by Aug. 31.

## Recertification Pathways

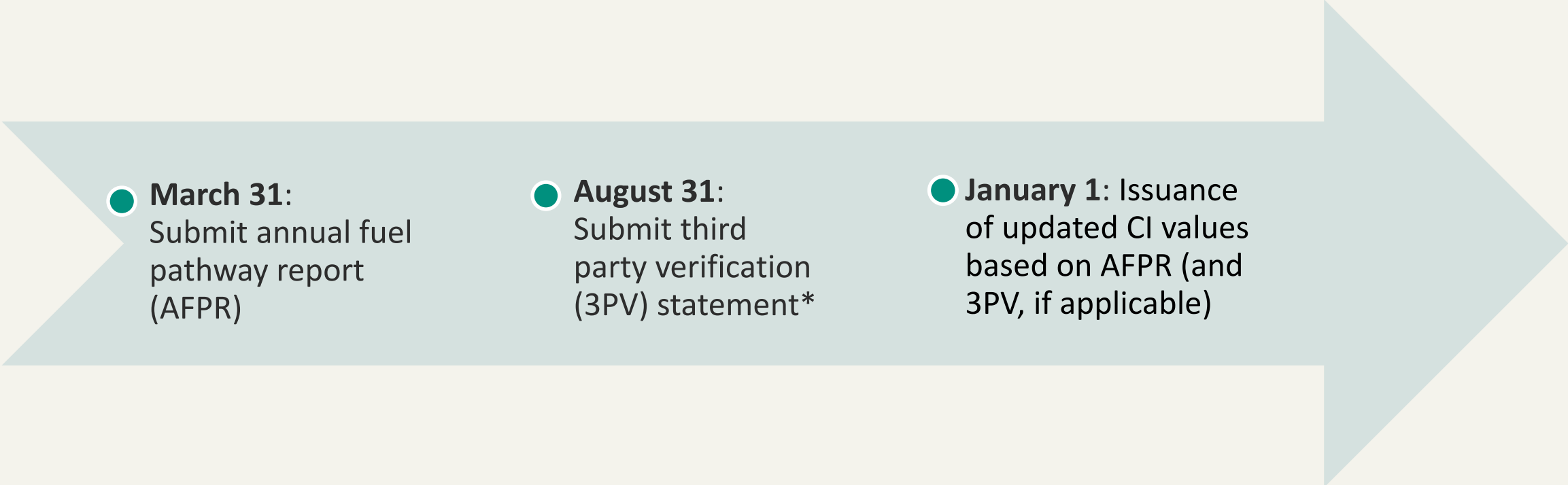
(Fuel pathways initially certified under the CARB's LCFS):

1. Submit the CA-GREET AFPR and OR-GREET AFPR by March 31.
2. See verification threshold requirements for recertification fuel pathways on slide 6.
3. If you are not undergoing verification under the Oregon CFP, there is no need to complete the conflict of interest disclosure with DEQ.
4. Submit CARB verification statement and report and log of issues, if applicable, to Oregon CFP within 10 days of submitting it to CARB.

# The AFPR Third-party Verification Process

- Verification activities may not begin until DEQ has approved the responsible entity's conflict of interest disclosure form.
- Fuel pathway holders assign their verification bodies to the AFPRs in the OFRS AFP. Then, go to the 'My Facilities' tab and find the Assign VB tab. When you select the Assign VB tab, you should see a drop-down menu of VBs.
- Email the 3PV inbox if you cannot find the VB in the AFP or are unsure whether your facility meets the at least 6,000 credits and deficits generated per year threshold for verification: [3pverify@deq.oregon.gov](mailto:3pverify@deq.oregon.gov).
- If you are subject to third party verification in Oregon and your verification body is recommending either a Qualified Positive or Adverse verification statement, submit the Log of Issues from your verification in the AFP along with the verification statement.

# Timeline of AFPR Activities

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- **March 31:**  
Submit annual fuel pathway report (AFPR)
  - **August 31:**  
Submit third party verification (3PV) statement\*
  - **January 1:** Issuance of updated CI values based on AFPR (and 3PV, if applicable)

\*For recertification pathways, send the CARB verification statement and AFPR to Oregon CFP within 10 days of submitting it to CARB.

Note: Oregon CFP accepts fuel pathway applications on an on-going basis.

# References

Document recapping [AFPR reporting and verification requirements](#)

Information on how to use [Renewable Energy Certificates](#) for the Clean Fuels Program

Oregon Third Party Verification [website](#)

# Contacts

**Annual Fuel Pathway Report general information:**

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

**Third-party verification information:**

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

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