Verification of Quarterly Electricity Transactions Reporting in the Oregon Clean Fuels Program

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Disclaimer

Information provided in these slides is an effort to summarize our regulations, it does not supersede the requirements of Oregon Administrative Rule Chapter 340 Division 272 or OAR 340-253.

If any information presented here conflicts with the regulations, the regulations take precedence.

Agenda

- How quarterly electricity reporting differs from quarterly liquid fuels reporting
- Reporting requirements
- Fuel pathway codes for electricity
- Common and uncommon fuel applications
- Verification considerations
- Verification tips and scenarios
- Resources and contacts

Electricity Reporting Overview

Fuel supply equipment for electricity

- All electricity reporting is through Fuel Supply Equipment (FSE) registration numbers.

- In the registration process, DEQ staff review documentation to ensure that each FSE/charger is only registered by one entity via the hardware serial number, and that the FSE is operational.

Fuel supply equipment for electricity

- In some cases, the FSE may be a meter on a panel or circuit that multiple chargers are connected to. In those cases the chargers are also registered to prevent someone else registering them.

- When chargers or meters are deactivated or swapped out, the reporting entities must report that to DEQ and register the new charger or meter – they cannot keep using the same FSE ID number even if it is a replacement in the same location.

Electricity reporting versus other fuels

- Most similar to CNG/RNG reporting in terms of fuel amounts reported per FSE.
- However, it's different in that:
  - Metering is generally internal to the device, and those meters cannot be recalibrated
  - While most metering setups are straightforward and centralized, some are very complex, especially for forklifts
  - Significantly more EV chargers than any other category of FSE
  - Significantly more Fuel Applications than any other fuel type
  - Aggregators are more critical in this area

Data elements required for reporting

- Date
- Fuel Pathway Code (FPC)
- Fuel Amount in KWh – Many reporters report total charging over a quarter per FSE, some will report individual charging events
- Transaction type – Will always be “EV Charging”
- Fuel Application Type – One FSE can have two or more application types depending on which vehicles use the charger
- Aggregation -- Indicating if the fuel amount is a sum up of quarterly or monthly charging into a single transaction or individual charging events
- FSE ID

Fuel Pathway Codes for Electricity

Electricity fuel pathway codes

Fuel Pathway Code	Description	Checks to perform	Possible evidence
ORELC**2025**	**Statewide mix** Generally available, the last four digits of this code change annually to reflect the current year.	No additional checks needed	
ORELC**XXX25**	**Utility specific mixes** XXX represents the code for the specific utility, or FRC for the set of utilities that have the same CI because they are full requirements customers of the Bonneville Power Administration. The last two digits of this code change annually to reflect the current year.	Check that the electric vehicle chargers are in that utilities' service territory (see slide 27 for details)	Utility bills
ORELCPBSN**XX** ORELCPGF**XX**	**Utility Renewable Electricity Products** These are products offered by the state's large utilities that they certify through the Clean Fuels Program for use with both their own residential EV credit generation and for their customers whose chargers are covered by those products.		Monthly bills Or Annual agreements with the utilities that their electricity usage is covered by these agreements

Electricity fuel pathway codes

Fuel Pathway Code	Description	Checks to perform	Possible evidence
ORREC**2025**	**Renewable electricity, deemed to have a CI of zero** The last four digits of this code change annually to reflect the current year.	The WREGIS REC retirement reports covering at least the quantity of electricity reporting must be submitted in the supplemental reporting portion of the quarterly report.	
ELC026OR-01070100 ELC998OR00110100	**Producer-specific renewable electricity pathways.** These pathways are tied to electricity from a specific renewable electricity generator (often a biogas project).	The renewable electricity producer for the FPC must match the renewable electricity generator for the RECs.	

Fuel Applications

Fuel applications

- Electricity has far more fuel applications than any other fuel type due to the wide array of energy economy ratios for different electric vehicles.
- Energy economy ratios are used in multiple parts of the credit calculation, and if selected incorrectly, can lead to the generation of illegitimate credits.
- Uncommon fuel applications need supporting evidence.

Fuel applications

- For on-road EV chargers, the Light Duty BEV/PHEV (Battery Electric Vehicle/Plug In Hybrid Vehicle) fuel application is common and should be the default for reporting entities.
- Those reporting a different fuel application (e.g., Truck or Bus) should have evidence to substantiate that those vehicles were charged – e.g., a school district with electric buses, or a trucking fleet with chargers for electric trucks.

Fuel applications

Common in reporting:

LDV/MDV-BEV or PHEV
HDV/Off-Road - Electric Forklifts (2016 and later)
HDV/Off-Road - Electric Forklifts (Pre-2016)
HDV-BEV or PHEV Truck

Uncommon in reporting:

LDV/MDV-Electric Motorcycle
HDV/Off-Road - Aerial Tram (pre-2012)
HDV/Off-Road - Cargo Handling Equipment
HDV/Off-Road - Fxd Gwy LR Expansion (post-2012)
HDV/Off-Road - Fxd Gwy LR System (pre-2012)
HDV/Off-Road - SC Expansion (post-2012)
HDV/Off-Road - SC System (pre-2012)
HDV/Off-Road - Ocean-Going Vessels
HDV/Off-Road - Shaver and Sause Tier 2 EER Vessels
HDV-BEV or PHEV Bus
HDV-Electric Ground Support Equipment
HDV-Electric TRU (eTRU)

Verification Considerations

Monitoring plans

- Follow the requirements of OAR 340-253-0600(9).

- If the entity is subject to verification under California's LCFS, the same monitoring plan may be used for a reporting entity up to a point – the monitoring plan must be specific to Oregon and the reporting they do here.

Monitoring plans

- For aggregators, the verification plan requires a list of entities the aggregator reports for on behalf of and what fuel types they report.
- Aggregators must also include this information in their monitoring plans per OAR 340-253-0600(9)(c).
- This list ideally helps inform the verification team of the contributions made to reporting from various sources and helps them establish a risk assessment for the verification.

How to evaluate risk for site visits

- **Inherent risk:** How likely is it that there are errors or misstatements in the reporting before operational controls are considered?
  - Inherent risk typically considers the complexity of reporting, the relative contributions of particular data types, etc.
- **Control risk:** How likely is it that a control meant to prevent error or misreporting has failed?
  - Control risk typically considers the operational controls, internal policies, training procedures, data management systems, and other particulars of a company's approach to data collection and management that might pose risk.

How to evaluate risk for site visits

Detection risk: How likely is it that the verification team's verification/sampling plans would miss an error or misstatement?

- DEQ requires verification bodies to reach **reasonable assurance**, which means that they have seen enough relevant data to conclude that the overall data is unlikely to include error or misstatement.

Site visit considerations

Data collection for electric vehicle chargers is generally digital and networked, so many companies are using reports available from the Electric Vehicle Supply Equipment service providers (e.g., Chargepoint, Blink)

Site visit considerations

Aggregators may pose a challenge for evaluating where to do site visits as they report for a number of different entities, and the way data is collected and reported may vary widely based on location and charging type.

Site visit considerations

OAR 340-272-0420(1)(d): *For aggregators and network service providers for electric vehicle supply equipment, the verifier(s) must make at least one site visit to the location where the aggregator's records are stored. Additional site visits to the entities using an aggregator are to be performed at the verifier's discretion and must follow the requirements for sampling outlined in OAR 340-272-0425*;

Site visit considerations

- According to regulation, an onsite visit is required at a location where the entity's records are stored.
- Additional site visits and/or supplementary remote visits based on the risk assessment in the sampling plan are ways to reach reasonable assurance.
- Verification teams should consider number and location of sites, operational controls at each site, differences in data collection or reporting strategies by site, etc.

Verification tips and scenarios

Common electricity reporting issues

- Incorrect fuel applications being used.
- Incorrect fuel pathway code being selected (e.g. wrong utility-specific CI for a charger).
- Incorrectly summing up data for aggregated reporting, such as reporting the total charging to date from install for a charger instead of calculating the actual amount charged in a given calendar quarter.
- Data entry and/or calculation errors.

How to look up if a charger is in a utility

- The addresses for FSE/Chargers can be looked up in the Registered FSE tab for an organization.

- That address can be used to determine if the chargers are in the service territory of a utility with a utility-specific CI on the Oregon Department of Energy's lookup tool:
  - Oregon Department of Energy Lookup Tool

Differences with other meters

- Electric meters cannot be regularly recalibrated like other meter types.
- The meters are generally inside of the charging units, and will last the life of the units.
- Misreporting can happen if the meter is or becomes inaccurate, but will be more difficult to catch.

Uncommon metering setups

- Generally, EV chargers have internal meters that are used for reporting.

- In some situations, a single meter over a circuit or panel with one or more chargers can be used if the reporting entity can ensure that no other sources of electrical load are on the circuit or panel, or if they can otherwise account for those non-charging loads.

Forklifts

- As for all fuels, fuel quantities must be reported based on accurate metering. If the fuel cannot be accurately metered at the point of dispensation, then DEQ may approve an alternative methodology that results in accurate reporting.
- Following slides: alternative metering methods for forklifts, where the charging units often do not have metering.
- In these cases, the FSE registration must include how the data is being captured to ensure only qualifying electricity is reported and that method must be captured in the monitoring plan.

Forklifts - Specific guidance for different meter locations

- **Meter location**: On the wall, circuit, or electrical panel.
- **Application**: When an electric meter is used to report forklift charging across multiple chargers or forklifts then the electric meter is registered as the FSE.
- The registration documents and monitoring plan must confirm that only forklift chargers are connected to the circuit or the panel.
- The data must be metered amounts without any adjustments, except if an entity is subtracting charging claimed by a rental forklift's owner or is netting out non-qualifying electricity.

Forklifts - Specific guidance for different meter locations

- **Meter location**: On the charger or charging cable.
- **Application**: If the meter is on the charger or a charging cable, the charger must be registered as the FSE.
- The data must be representative of the amount charged into forklift batteries.
- The data must be metered amounts without any adjustments, except if required by DEQ or an entity is subtracting charging claimed by a rental forklift's owner.

Forklifts - Specific guidance for different meter locations

- **Meter location**: On the forklift.
- **Application**: If the meter being used for reporting is on the forklift, then the forklift must be registered as the FSE.
- The data must be representative of the forklift tracking the amount charged into it.
- Pre-2016 and 2016 & later models must be accurately reported against appropriate fuel application. And there should not be any proportional allocation of the data within the FSE.

Forklifts - Specific guidance for different meter locations

- **Meter location**: For rental forklift fleets.
- **Application**: An owner of a rental forklift fleet, or more generally an owner of forklifts operated by others. If the data is available, the rental forklift is registered as the FSE.
- The data must be metered for the forklift(s) that are being reported like what is required in previous slides, but the rental fleet owner must ensure that double-reporting is not occurring with the operator of the forklift(s).

Resources and Contacts

Resources list

For Oregon Clean Fuels Program:

Oregon Clean Fuels Program Home Page

For Third Party Verification:

Oregon Third Party Verification Home Page

Oregon Department of Energy lookup tool:

Oregon Department of Energy Lookup Tool

Contact us

Clean Fuels Team:
Bill Peters
Chintan Trivedi
Courtney Herbolsheimer
OregonCleanFuels@deq.oregon.gov

Third party verification staff:
Liz Hardee
3PVerify@deq.oregon.gov

Title VI and alternative formats

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Contact: 800-452-4011 | TTY: 711 | deqinfo@deq.state.or.us