

Oregon Department of Environmental Quality Annual Fuel Pathway Report and Third-Party Verification - 2025

Clean Fuels Program: Fuel Pathways

Annual Fuel Pathway Report Requirements

- 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.
- Third party verification may be required based on OAR 340-272.
- Verification statement is DUE no later than August 31 (but actually Monday, Sept. 1 this year due to Aug. 31 falling on a Sunday), or within 10 days of submitting to CARB for recertification pathways.

AFPR Process Overview and Due Dates

Date	March 31	September 1	3Q 2025 and 4Q 2025	Q4 2025-1Q 2026	1Q 2026
Activity	Annual fuel pathway report due	Third party verification statement due*	DEQ Review of AFPRs and 3PVs	Issuance of updated CI values based on AFPR, 3PV (if applicable), and OR-GREET 4.0	Issuance of additional credits, as applicable

*For recertification pathways, send the CARB verification statement and AFPR to Oregon CFP within 10 days of submitting it to CARB. Normal due date is Aug. 31, which is a Sunday this year.

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

Changes from 2024 Rulemaking

- OR-GREET 3.0 is being replaced by OR-GREET 4.0
- 2025 Annual Fuel Pathway Reports must contain filled out copies of both OR-GREET 3.0 and 4.0
 - The 3.0 calculator will be used to confirm compliance with your currently issued CI value(s)
 - The 4.0 calculator will be used to issue CI values for 2026+ reporting
- Recertification pathways must include a filled out OR-GREET 4.0 calculator

Changes from 2024 Rulemaking

- Any updates from verification to the submitted data must be made in both calculators
- Producers with recertification pathways are responsible for ensuring that the 4.0 calculator is fully updated with any corrections from the California verification
- Dairy and Swine Manure(DSM) to Electricity pathways have returned to Tier 2 status, DEQ is publishing a guidance document shortly on modifying the DSM to RNG Tier 1 calculator which will be available on our fuel pathways page

How to submit AFPR in OFRS

- [Login to OFRS.](#)

Oregon Fuels Reporting System

CURRENT PROGRAM INFORMATION	▼	DEQ has developed the Oregon Fuel Reporting System to implement the Clean Fuels Program and collect data from fuel suppliers for the Greenhouse Gas Reporting Program. Only businesses registered with CFP or the Greenhouse Gas Reporting Program are allowed access to the system. It is a web-based tool used for:	Access the Oregon Fuels Reporting System For future reference, please bookmark this page and not the login page for the system. Do not register to be a user in OFRS without first registering to participate in the CFP. See the information to the left for directions. Contacts For more information on this program, email Oregon Clean Fuels .
FOR PARTICIPATING FACILITIES	▼	<ul style="list-style-type: none">• Regulated parties and credit generators to submit quarterly progress reports that generate deficits and credits;• Regulated parties to submit annual compliance reports to demonstrate compliance with the clean fuels standards;	
CLEAN FUELS DATA	▼	<ul style="list-style-type: none">• Regulated parties and credit generators to transact (buy and sell) credits;• Alternative fuel producers to register and report on fuel pathways;	
ELECTRIC VEHICLE PROGRAMS	▼	<ul style="list-style-type: none">• Aggregators to report on behalf of their designees; and• Greenhouse gas reporting parties to submit their annual reporting for the Greenhouse Gas Reporting Program.	
Frequently Asked Questions		How to register with the Oregon Clean Fuels Program +	

How to submit AFPR in OFRS

- Navigate to the My Facilities tab.



- Under the Fuel Pathway Applications column, click “View Pathways”

▶ Test non-epa 1	123 test road, Testington, CA, US 97215	Latitude: 41.021987 Longitude: -98.874666	Name: Navigator Edric; Title: Test Account; Phone#: (123) 123-1234; Email: peters.bill@deq.state.or.us; URL: oregon.gov/deq	View Pathways	Assign VB
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How to submit AFPR in OFRS

- Start a new application. Select Tier 1 for Tier 1 FPCs. Select Tier 2 for Tier 2 FPCs. Click GO.

Test non-epa 1

Producer: [REDACTED] Test account Facility: Test non-epa 1
Company ID: [REDACTED] Facility ID:

Start New Application: [Dropdown] **GO**

App No.	Application Type	No. of Joint Applicants	No. of Pathways	Application Status	Provisional	Assigned To	Last Modified	Mod By	History	Details	Delete
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]			

There are no records to display

Page size: 20 0 items in 1 pages

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How to submit AFPR in OFRS

- Select applicable conditions and click NEXT. If you have multiple pathways, you must select that here.

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**

- Click Add Pathway.

Tier 1 Pathway Application #

Fuel Pathways

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

Back **Cancel** [+ Add Pathway](#)

How to submit AFPR in OFRS

- Select Fuel Type and Feedstock.
- In the Pathway Description, include:
 - “Annual Fuel Pathway Report”
 - FPC
 - Same CI, Lower CI, or Higher CI
- Enter the operational CI.
- Click Add Pathway.

The screenshot shows the 'Pathway Details' form in the OFRS system. The form is titled 'Pathway Details' and contains the following fields and values:

- Fuel Type:** Ethanol
- Feedstock:** Corn Kernel Fiber
- Pathway Description:** Annual Fuel Pathway Report. FPC: xxx. Same CI
- Applied CI Value:** 45 (Max: 500)
- Direct Emission (CI) (gCO₂e/MJ):** 60.0
- Indirect Emission (CI) (If any) (gCO₂e/MJ):** 0.0
- Total CI Value:** 60.0

At the bottom of the form, there are two buttons: 'Cancel' and 'Add Pathway'. The 'Add Pathway' button is circled in red. A red asterisk and the word 'REQUIRED' are visible at the bottom left of the form.

How to submit AFPR in OFRS

- Continue adding pathways, if applicable. When done, click Next.

Tier 1 Pathway						Application #
Fuel Pathways						
Pathway Number	Fuel Type	Feed Stock	Applied Pathway Description	Applied CI (gCO ₂ e/MJ)	Delete	Details
	Ethanol	Corn Kernel Fiber	Annual Fuel Pathway Report. FPC: xxx. Same CI	60.00	X	Edit

How to submit AFPR in OFRS

- Upload Pathway Documents. At a minimum, this will include OR GREET 3.0 and 4.0 calculators and a signed attestation letter. Click Next.

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: * GREET1_2023_Rev1.xlsxm

File or Document Type: *

Remarks:
Biomethane/Biogas AFP Attestation Letter
Supporting Document

* REQUIRED

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

How to submit AFPR in OFRS

- Review application for completeness.
 - If you need to add additional information, click Save Application.
 - If the application is complete, click Submit. DEQ will not be able to access the application until you submit.

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)

Fuel Pathways

Pathway Number	Fuel Type	FeedStock	Applied Pathway Description	Applied CI (gCO ₂ e/MJ)	Delete	Details
	Ethanol	Corn Kernel Fiber	Annual Fuel Pathway Report. FPC: xxx. Same CI	60.00	✕	Edit

Pathway Documents [+ Add File](#)

Document Type	Document Name	Description	Date	Download	Delete
Attestation Letter	CFP_Attestation_Form_CI_Change_December_2024.pdf		03/05/2025		✕

[Cancel](#) [Save Application](#) [Submit](#)

AFPR Requirements for Non-recertification Pathways

- **Deadline:** Fuel pathway holders are required to
 - Submit the simplified OR-GREET or full OR-GREET calculator by March 31.
 - Must contain the most recent two years (24 months) of operating data, or up to 24 months for provisional pathways.
 - All details specified in the operating conditions.
 - 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.

Additional Information: Non-provisional Pathways

- Initially certified in Oregon based on 24 months of a fuel production facility's operational data submitted in the CI calculator.
- The AFPRs associated with the facility's fuel pathway(s) must contain the most recent 24 months of operational data (January 2023 – December 2024).
- If requirements in OAR 340-253-1050(5) are met, additional credits may be requested by emailing OregonCleanFuels@deq.oregon.gov.

Additional Information: Provisional Pathways

- Initially certified in Oregon based on at least three (3) months of fuel production facility's operational data submitted in the CI calculator.
- The AFPRs associated with the facility's fuel pathway(s) must contain the most recent, up to 24 months, of operational data (January 2023 – December 2024).
- Provisional pathways are not eligible for additional credits under OAR 340-253-1020(5)(b).

AFPR Requirements for Recertification Pathways

- **Deadline:** Fuel pathway holders are required to
 - Submit the CA AFPR and OR AFPR by March 31.
 - Submit the CA AFPR and CARB verification statement 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.

Additional Information: Recertification Pathways

- Initially certified under the California Air Resources Board's Low Carbon Fuel Standards program, and the fuel pathway holder would like to transport the fuel to California and Oregon.
- These pathway holders must submit the CA-GREET model and OR-GREET models 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.
- Provisional and non-provisional CARB certified pathways can be submitted as recertification pathways under the CFP.

The AFPR Third-party Verification Process

- Verification activities may not begin until DEQ has approved the responsible entity's conflict of interest disclosure form.
- 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.
- For any questions or issues, email: 3pverify@deq.oregon.gov.

Verification: A Comparative Overview

Certification Fuel Pathways

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

1. Submit the OR-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 23.
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, report, and log of issues, if applicable, to Oregon CFP within 10 days of submitting it to CARB.

3PV Requirements for Non-recertification Pathways

- **Verification threshold requirement:**
 - For facilities that generate fewer than or equal to 6,000 credits and deficits per year under CFP, the fuel pathways do not need to be third-party verified.
 - Facilities that generate greater than 6,000 credits and deficits per year must undergo annual third-party verification.
- **Conflict of interest for non-provisional and provisional pathways:** Complete COI disclosure prior to the start of verification activities.

3PV Requirements for Recertification Pathways

- **Verification threshold requirement:**
 - For facilities that generate fewer than or equal to 6,000 credits and deficits per year under CARB's LCFS, 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 and deficits 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 and deficits per year under CARB's LCFS but 6,000 or more credits and deficits in CFP, the facility must undergo annual third-party verification in Oregon.

Submitting 3PV results in OFRS

- Reminder: A [conflict of interest form](#) must be submitted and approved **prior** to beginning third party verification.

Submitting 3PV results in OFRS

- When 3PV is complete, attach the results and updated calculators (if applicable) to the fuel pathway application.
 1. Email noel.mak@deq.Oregon.gov and OregonCleanFuels@deq.Oregon.gov to request the application be reopened.
 2. You will receive a Request for Information from DEQ asking you to update.
 3. Attach the files.
 4. Click Submit.

Contacts

Annual Fuel Pathway Report general information:

OregonCleanFuels@deq.oregon.gov

Third-party verification information:

3PVerify@deq.oregon.gov

Questions and answers

- Please place your question in the chat or use Zoom's Raise Hand function

References

- [CFP Fuel Pathways web page](#)
- AFPR general information: [Fuel Pathway Report](#)
- [Renewable Energy Certificates documentation](#)
- [Third-party Verification web page](#)

Title VI and alternative formats

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