Oregon Clean Fuels Program and Greenhouse Gas Reporting Program

2021 Oregon Fuel Reporting System Updates
Training for Organizations Reporting to Both CFP and GHG RP

Stephanie Summers and Matt Steele, Office of Greenhouse Gases, Oregon Department of Environmental Quality
Overview

- Review changes to online reporting system for entities that report to **both** the CFP and Greenhouse Gas Reporting Program (GHG RP)

- Review sign up and reporting process for CFP and GHG RP

- Common Reporting Issues

- New documentation available

- Questions will be taken at regular intervals as we discuss different aspects of the system and reporting
System Update - Background

- System update to streamline reporting of fuels to the CFP and the Greenhouse Gas Reporting Program (GHG RP) into one combined system

- New elements were added into the system from California’s recent updates
System Update – Phased Implementation

• Phase 1: New transaction types for quarterly reporting in CFP to collect data for GHG Reporting Program
  – These have been in use for 2020 reporting

• Phase 2: New reporting elements for the Greenhouse Gas Reporting Program’s (GHG RP) Annual Report and a few general updates to the system
  – These are in the latest update

• You will access the updated site from the same URL: https://cfprt.deq.state.or.us/
The Clean Fuels Program Reporting Tool has a new name: Oregon Fuels Reporting System or OFRS.

Entities which previously reported to the Greenhouse Gas RP through EZ-Fuels will be using the Oregon Fuels Reporting System beginning with the 2020 annual report.

The system is in the last stages of being updated and will be down for one full day on Tuesday, March 16. You should be able to use the system again on March 17. Let us know if you have any problems accessing the system after 9 a.m. on March 17.
CFP Basics

• Reporting to the Clean Fuels program is required under OAR 340-253-0100 for:
  – **Regulated Parties**
    • All persons producing or importing into Oregon any regulated fuel: gasoline, diesel, ethanol, biodiesel, renewable hydrocarbon diesel, any blends or constituents of these fuels, and any other liquid or non-liquid transportation fuel not listed
      – If importing less than 500,000 gallons of finished fuels, considered a small importer and only required to report to GHG RP
  – **Credit generators**
    • CNG, LNG, L-CNG, LPG; Electricity; Hydrogen fuel or hydrogen blend; and Alternative Jet Fuel
  – **Aggregators**
    • Authorized by a regulated party or credit generator to act on its behalf and report to the CFP for that entity
New Additions – Sign in Page

- **Reset Password**
  - Security questions allow users to reset their own passwords

- **Users reporting only to GHG RP** who did not have an account in CFP will need to register as a regulated party

- **Note:** Registered parties reporting to CFP will need to fill out the[appropriate registration form](#) to register with the CFP before signing up to use the system.
New Additions – Registration Screen

Organization details, new required fields:
- Date and place of Incorporation
- Organization Contact Person

Primary and Secondary Representatives
- Two representatives needed
- Given Administrator role for company
- New required fields: User Names, Titles, Relationship to Organization
- Contact details

This is where those newly signing up for system will fill out the registration categories
- Those already registered in system will find this on the organization profile tab
New Additions – Organization Profile/Sign up Screen

Action Item: Organization Profiles need to be updated by all organizations

All organizations:
• Update this screen with all fuels to be reported

• Update fuels under the program you are required to report to

• Reporting to both programs?
  • Select fuels under both CFP and GHG headings, including gasoline and diesel

• Credit generator, aggregator, or receiving residential EV credits?
  • Select categories under the CFP Registration categories by selecting and expanding the “opt-in” section
New Additions: Organization Profile – Designated Aggregators

**Action Item: Designator Fields**

Designated aggregators:
- Click Add Designators button to get the pop up to register entities you are aggregating for
- Upload Aggregator Designation form on this page
- You will need the FEIN of your designator to complete this step

If you are a new registrant, this can be filled out during registration in the system
New Additions: User Profile Tab

Action Items: New Fields

Required fields:
- Title
- Relationship to Organization
- Default Role
- Security Questions

Admin has ability to add users and to add/remove roles for users on this screen.
Credit Generators/Aggregators: Registering Fuel Supply Equipment

- Updated FSE Registration Guide is available on the website on the OFRS page

- Updated FSE registration spreadsheet found on Home tab requires yes/no on if the entity registering is aggregating for another company
  - If yes, the FEIN of the company you are aggregating for is required to be uploaded in the spreadsheet for each FSE

- Propane FSE columns are now included

- **Fuel Supply Equipment detail form** required for:
  - Forklifts, eTRU, eCHE, and eOGV
    - Please note that eCHE and eOGV are being added in the current rulemaking going before the EQC for approval later this month and are not yet in our rules

- System now has the capability to handle start/stop dates for FSE
CFP Reporting

- Remains largely the same as previous years of reporting
- Updated user guide contains detailed instructions on:
  - Adding fuels
  - Adding transactions
  - Adding Reporting Manually or by Upload
  - Submitting reporting

Only receiving Residential EV Credits? Ensure the credit balance tab will reflect an accurate credit balance:
- Submit “no transaction” reports quarterly
- Submit annual report
CFP Reporting: Adding Fuels

Add:
- Fuel Name
- Fuel Application
- Fuel Pathway Code
CFP Reporting: Adding Transactions

Add:
- Transaction Date
- Transaction Type
- Transaction Quantity
- Transaction Number
- Business Partner
- Biofuel Facility, if needed
- Check the box if aggregated
- Transaction Description
Technical Files found on home tab can be used to enter many transactions at one time.

<table>
<thead>
<tr>
<th>Technical Files</th>
<th>FSE Reporting</th>
<th>Non-FSE Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td>XSD for XML file upload</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• last updated 2/10/2021 5:06 PM</td>
<td></td>
<td></td>
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<tr>
<td>• release notes</td>
<td></td>
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<tr>
<td>Excel Template for file upload</td>
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<tr>
<td>• last updated 2/10/2021 5:06 PM</td>
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<tr>
<td>• release notes</td>
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<tr>
<td>Facility - Fueling Supply Equipment (FSE) Registration Template</td>
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<td>• last updated 2/10/2021 5:00 PM</td>
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</tr>
<tr>
<td>• last updated 2/10/2021 5:06 PM</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Regulated Entities/Transaction Types: Import and Position holder transactions

- **Import transactions:**
  - Import within the bulk system: fuel is going to a terminal or directly to a Producer to be dispensed or used for production
  - Import outside the bulk system: fuel is going to intermediate storage or directly to retail sites
    - Import (and export) transactions should tag the Undefined business partner (14-9876543)

- **Position holder transactions:**
  - **All sales below the rack must be reported** whether the fuel is staying in state or being exported
  - **Position holder sale for export:** fuel is going to be exported, tag business partner, can aggregate by business partner and month or quarter, can tag Undefined (14-9876543) business partner if that company is not registered in system
  - **Position holder sale without obligation:** fuel is being delivered in state, tag business partner or can aggregate to Undefined (14-9876543) business partner by month and quarter
  - **Purchase below the rack for export:** must be used by entity buying fuel below the rack and exporting, tag and aggregate by business partner and month or quarter, and must also use an Export out of Oregon distribution system transaction for those gallons
Regulated Entities/Transaction Types: Import and Position holder transactions

Position holder sale transaction example:

- If Company B buys fuel below the rack from Company A and then exports it out of state:
  - Company A reports this as a Position holder sale for export and selects Company B as the business partner in the transaction
  - Company B reports the transaction as a Purchase below the rack for export and selects Company A as the business partner
  - Company B also enters another transaction “Export out of the Oregon distribution system” and selects the Undefined business partner for that transaction
Regulated Entities/Transaction types: Purchase/Sale with/without Obligation

Purchase or Sale with or without obligation

• Use for:
  – Transactions above the rack
  – Sales below the rack going to in state Producers
    • Producers will report their sales as Position holder sales
  – Sales below the rack going to exempt uses
  – “Flash sales”
    • Seller owning fuel in terminal reports as Sale with or without obligation
    • Second party owns fuel momentarily before selling to entity picking up below rack
    • Second party reports sale to third party using one of the Position holder transaction types and must tag business partner
    • Third party reports purchase if the fuel is being exported as Purchase below the rack for export
Regulated Entities/Transaction types: Purchase/Sale with/without Obligation

Purchase with or without obligation and Sale with or without obligation example:

• Company A sells fuel to Company B at the rack and Company B immediately sell it to Company C, who is buying it below the rack and indicates it will be delivered it in state

• This is a “flash sale”
  – In this case, Company A reports the sale to Company B as a Sale with or without obligation and selects Company B as the business partner
  – Company B reports the purchase as a Purchase with or without obligation and selects Company A as the business partner
  – Company B reports the sale to Company C as a Position holder sale without obligation and selects Company C as the business partner
  – Company C would not be required to report the purchase, as it is being delivered in state

• Company C ends up delivering the fuel out of state instead of in state
  – If Company C ended up delivering the fuel out of state after the purchase, Company C informs Company B of that change or the companies would discover the discrepancy during the reconciliation period
  – Company B updates the transaction in their reporting as a Position holder sale for export
  – Company C updates their reporting to Purchase below the rack for export and adds an Export out of Oregon distribution system transaction for those gallons
CFP Reporting: Reconciling with Business Partners

- For those reporters reporting transactions with business partners, the second half of the 3 month reporting period for each quarter should be used to reconcile transactions with those business partners.
Once transactions are submitted, use the submit button on the CFP Reports tab to submit for the reporting period.
Submit screen: CFP Annual Report

- Annual Report tab
- Summary of all 4 quarters and an annual summary table
- Check the accuracy confirmation box and click Submit Annual Report
Fuel Suppliers and In-State Producers

• Required to report emissions from combustion of all fuels supplied within Oregon (OAR 340-215-0110)

• Emissions quantified using methodology in 40 C.F.R. part 98, subpart MM for CO$_2$ emissions and subpart C for CH$_4$ and N$_2$O emissions
Current Reporting Requirements

Applicability

• Applies to all fossil and biomass-derived fuel types

• Applies to any person who:

  1. Is subject to the Oregon Motor Vehicle and Aircraft Fuel Dealer Tax
  2. Is subject to the Oregon Use Fuel Tax, OR
  3. Produces, imports, sells, or distributes at least 5,500 gallons of gasoline, distillate fuel oil, biofuels, or aircraft fuel (or 10,500 gallons of propane) in a year.
Applicability

• To reduce duplicative reporting and compliance costs, DEQ only requires reporting from two categories of supplier:

1. **Position Holders**: Company that disburses fuel from a terminal

   *Terminal*: Large fuel storage and distribution facility, generally supplied by a pipeline, rail, or vessel.
Applicability

• To reduce duplicative reporting and compliance costs, DEQ only requires reporting from two categories of supplier:

2. **Fuel Importers**: Company that imports fuels from outside Oregon.
   
   • Only applies to fuels that do not go to a Terminal
   • Most often applies to fuel imported by truck
• New transaction types transfer data from CFP reporting to GHG reporting

  • “Position Holder Sale Without Obligation” →
    “Position Holder”

  • “Import Outside the Bulk System” →
    “Fuel Importer”
Key Reporting Changes:

• All volumes reported in gallons (not barrels)

• Separately add any non-CFP fuels (e.g. propane, aviation fuel)

• Blended fuel types must be input separately

100 gallons of B20 = 80 gallons of diesel + 20 gallons of biodiesel
Greenhouse Gas Annual Report

How to Report

Annual Reports

Clean Fuels Program

<table>
<thead>
<tr>
<th>Year</th>
<th>Due Date</th>
<th>Submitted</th>
<th>Annual Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; 2020</td>
<td>04/30/2021</td>
<td>No</td>
<td>Go to Report</td>
</tr>
</tbody>
</table>

GHG Reporting Program

<table>
<thead>
<tr>
<th>Year</th>
<th>Due Date</th>
<th>Submitted</th>
<th>Annual Report</th>
<th>Unlock Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; 2020</td>
<td>04/30/2021</td>
<td>No</td>
<td>Go to Report</td>
<td>Unlock</td>
</tr>
</tbody>
</table>

Oregon Fuels Reporting – CFP and GHG RP
## Aggregated Volumes from your CFP Quarterly Reports

**Position Holder (Gasoline)**

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>Fuel Amount (gal)</th>
<th>Anthropogenic Emissions (MTCO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>CO2</td>
</tr>
<tr>
<td>Gasoline formulation unknown</td>
<td>10000 gal</td>
<td>89.60</td>
</tr>
<tr>
<td>Gasoline formulation unknown</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Conventional summer regular</td>
<td>10000 gal</td>
<td>89.60</td>
</tr>
<tr>
<td>Conventional summer midgrade</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conventional summer premium</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conventional winter regular</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conventional winter midgrade</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conventional winter premium</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Select gasoline type**
Specified fuel type is removed from the unknown total
Biofuels are listed together at the bottom of the CFP aggregate data.

<table>
<thead>
<tr>
<th>Supplier Type</th>
<th>Fuel Name</th>
<th>Fuel Amount (Gal)</th>
<th>Biogenic Emissions (MTCO2e)</th>
<th>Anthropogenic Emissions (MTCO2e)</th>
<th>Total (MTCO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>CO2</td>
<td>CH4</td>
<td>N2O</td>
</tr>
<tr>
<td>Fuel Importer</td>
<td>Biodiesel</td>
<td>500</td>
<td>4.71</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Position Holder</td>
<td>Biodiesel</td>
<td>2000</td>
<td>18.84</td>
<td>0.01</td>
<td>0.01</td>
</tr>
<tr>
<td>Fuel Importer</td>
<td>Ethanol</td>
<td>1000</td>
<td>5.77</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Position Holder</td>
<td>Ethanol</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
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<td>3500</td>
<td><strong>29.32</strong></td>
<td><strong>0.01</strong></td>
<td><strong>0.01</strong></td>
</tr>
</tbody>
</table>
### Reporting GHG-only fuels

**GHG Reporting**

<table>
<thead>
<tr>
<th>Supplier Type</th>
<th>Fuel Type</th>
<th>Fuel Amount (Gallons)</th>
<th>Greenhouse Gas Emissions (MTCO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Anthropogenic Emissions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>CO2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total MTCO2e</td>
</tr>
</tbody>
</table>

No records to display.

**Greenhouse Gas Emissions (MTCO2e)**

<table>
<thead>
<tr>
<th>Anthropogenic Emissions</th>
<th>Biogenic Emissions</th>
<th>Total MTCO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>CH4</td>
<td>N2O</td>
</tr>
<tr>
<td></td>
<td></td>
<td>CO2</td>
</tr>
</tbody>
</table>

There are no records to display.
Greenhouse Gas Annual Report

Reporting GHG-only fuels

<table>
<thead>
<tr>
<th>Supplier Type</th>
<th>Fuel Type</th>
<th>Fuel Amount (Gallons)</th>
<th>Greenhouse Gas Emissions (MTCO2e)</th>
<th>Total MTCO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Importer</td>
<td>Aviation gasoline</td>
<td>10000</td>
<td>Anthropogenic Emissions</td>
<td>Biogenic Emissions</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>CO2</td>
<td>CH4</td>
</tr>
</tbody>
</table>

Save Record
Delete
Greenhouse Gas Annual Report

Greenhouse Gas Emissions (MTCO2e)

<table>
<thead>
<tr>
<th>Supplier Type</th>
<th>Fuel Type</th>
<th>Fuel Amount (Gallons)</th>
<th>Anthropogenic Emissions</th>
<th>Biogenic Emissions</th>
<th>Total MTCO2e</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Importer</td>
<td>Aviation gasoline</td>
<td>10000 gal</td>
<td>83.10</td>
<td>0.09</td>
<td>0.21</td>
</tr>
</tbody>
</table>

There are no records to display

Save

Submit
What to check for when reporting and submitting

- Make sure transactions are behaving as you would expect for CFP reporting and GHG reporting

- Check the “Aggregated quarterly transactions for GHG Reporting” table at the bottom of the Submit screen of the CFP quarterly report to ensure fuels are summing correctly

- When submitting CFP quarterly report, review for correctness, reconcile with business partners, and submit – do the same when submitting the CFP annual report

- When submitting GHG annual report, add data as requested/needed, review for correctness and submit
## Important Reporting Dates

### CFP Program

<table>
<thead>
<tr>
<th>Report</th>
<th>Period Covered</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>First calendar quarter</td>
<td>January - March</td>
<td>June 30</td>
</tr>
<tr>
<td>Second calendar quarter</td>
<td>April - June</td>
<td>September 30</td>
</tr>
<tr>
<td>Third calendar quarter</td>
<td>July - September</td>
<td>December 31</td>
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<tr>
<td>Fourth calendar quarter</td>
<td>October - December</td>
<td>March 31</td>
</tr>
<tr>
<td>Annual Report</td>
<td>January – December</td>
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### GHG Program

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</table>
Common Reporting Issues

CFP Reporting
• Not including import or position holder transactions
• Position holders not reporting below the rack sales for volumes staying in state
• Below the rack exporters not reporting Export out of Oregon Distribution system for those gallons
• Not reconciling with business partners before submitting report

GHG Fuels Reporting
• Position Holder vs. Fuel Importer
Resources

CFP Reporting

- OFRS Reporting Guide
- FSE Registration Guide
- FSE Detail Form
- FAQ

Greenhouse Gas Reporting

Resources and Forms

- Reporting Protocol
- How to Determine Fuel Type
- OFRS User Guides
Questions?

CFP Reporting
Stephanie Summers
• OregonCleanFuels@deq.state.or.us

GHG Fuels Reporting
Matt Steele
• GHGReport@deq.state.or.us