



# Low Carbon Fuel Advisory Committee

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## Low Carbon Fuel Standard Reporting

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## LCFS Reporting

**Presentation Covers:**

**California Reporting System**

**Overview of Other Reporting Systems  
for Fuels**



## LCFS Reporting

### Questions for LCFS Committee:

1. **Should Oregon use the web-based Compliance Reporting Tool?**
2. **How might Oregon LCFS reports be coordinated with other required reports?**



## LCFS Reporting

### California:

#### 1) Physical pathway (one-time report)

(allows correct carbon intensity to be assigned)

#### 2) Quarterly reports

(allows discrepancies to be detected early)

#### 3) Annual reports

(used to establish official compliance)



## 1) Physical Pathway

**Physical route (production to blender),**

**Evidence of fuel entering pathway,**

**Evidence of fuel exiting pathway, and**

**Revisions when pathway changes.**

- **This report allows a specific fuel to be assigned to the correct carbon intensity pathway. (Needed before credits can be generated.)**



## 2) Quarterly Reports

**Volume of fuel,**

**Average carbon intensity of fuel,**

**Transfers of fuel, compliance obligations,**

**Credits acquired, banked or traded.**

- **Prevents undue procrastination.**
- **Allows regulators and companies to detect any problems early.**



### 3) Annual Reports

**Same as quarterly reports plus:**

**Credits & deficits generated or carried forward, and**

**Credits acquired, sold, transferred or retired.**

- **Used to establish official compliance or noncompliance.**



## **Compliance Reporting Tool**

**Online, web-based tool (quarterly & annual reports).**

**Secure, open-source program.**

**Allows commonality with CA,**

**Includes Credit Tracking System.**



## Other Reports

**Can other reports be used for LCFS purposes?**

- **Air Quality Permits**
- **Fuel Tax Reports**
- **Phase II GHG Reporting Rule?**

**Reports need to coincide with (or be adaptable to) LCFS universe.**



## **LCFS Reports Need to Coincide**

**Do other reports capture upstream emissions?**

**LCFS is based on full life-cycle emissions.**



## **LCFS Reports Need to Coincide**

**Can reported fuels be matched with the appropriate fuel pathway?**

**Carbon intensity varies according to fuel origin, processing and transportation.**



## **LCFS Reports Need to Coincide**

**Do other reports apply to the same groups?**

**Oregon LCFS reporting groups are likely to differ from existing groups**



## **LCFS Reports Need to Coincide**

**Do exemptions align?**

**HB 2186 provides exemptions (log trucks) that don't match existing requirements.**



## Air Quality Permits

**AQ permit holders need to report emissions to DEQ—typically industrial emissions.**

**Permits include GHGs >25,000 tons.**

**Reported GHGs not limited to transportation fuels.**

**GHG reports cover *direct*, not *life cycle* emissions.**

**Fuel emissions not aligned with pathways.**



## **ODOT Fuel Tax Reports**

**Covers transportation fuels.**

**Non-road fuels not included.**

**Fuel tax reports don't reflect LCFS  
exempt fuels.**

**Fuels not matched with pathways.**

**Potential to serve multiple purposes if  
database system is built?**



## **GHG Reporting Rule (Phase II)**

**Rule in development. Scope is unknown**

**Might apply to fuels imported, distributed, or sold in Oregon.**

**Could include estimated GHGs from electricity (using DEQ emission factors)**

**GHG Phase II reports useful for LCFS purposes?**



## California LCFS Reporting System

### Specific to Low Carbon Fuel

(Transportation fuels, Life-cycle GHGs, Oregon's exemptions, Carbon intensity calculations)

**Will be familiar to those regulated by both California and Oregon**

**Web-based Compliance Reporting Tool**

**Credit Tracking System**



## Proposed Approach

**Adopt web-based reporting tool.**

**Align reporting for AQ permit holders with LCFS requirements (during permit review)?**

**Align GHG Reporting Rule (Phase II) with LCFS where feasible.**

**Align with Fuel Tax database (if passed).**