



## Low Carbon Fuel Standard (LCFS) Implementation Series #2

The Low Carbon Fuel Standard (LCFS) implementation is approaching and with the intention of becoming an accredited verification body, Christianson has been participating in discussions and Public Workshops with the California Air Resources Board (CARB).

This is the second in a series of updates that Christianson will be providing on the current status of the regulation. If you missed the previous newsletters, you can find them on our website <u>here</u>.

Validation and verification are two areas that have been a focus of recent discussion. Here are some of the key things to note:

## Validation vs. Verification

<u>Validation</u> – CARB requires that new fuel pathways complete a pathway application to obtain a certified carbon intensity (CI). Beginning January 1, 2019, everyone will be required to re-register under GREET 3.0 and this application process will also include a third – party validation of all the data that is submitted in the pathway application to determine CI. The validation will replace the requirement to submit 2 years of supporting documentation with the pathway application and is due within 6 months of the pathway submission date.

**<u>Verification</u>** – There are two main LCFS verification requirements that may affect renewable fuels:

- Fuel Pathway Report Verification Beginning in 2019, pathway holders will have an annual report due to CARB that will report 2 years of CI data and calculations. This annual report will require a third-party verification of the CI calculation and will include review of internal controls and supporting documentation for the inputs and outputs in the CI calculation. The verification statement will be due August 31<sup>st</sup> following the end of the period being verified, with the first verification due on August 31, 2020.
- Ouarterly Fuel Transaction Reports CARB requires the quarterly reporting of fuel transactions. These reports need to be verified annually by a third-party which will include review of product transfer documents, contracts and reports. They will also be due August 31<sup>st</sup> following the reporting year.

The next Public Workshop is taking place on Monday, November 6<sup>th</sup>. Please respond to this email or call Kari Buttenhoff at <u>320-235-5937</u> if you have questions or comments regarding LCFS validation and verification, or other LCFS topics. Additionally, please watch for our next email in the LCFS Implementation Series for further information and updates!

Call or Contact Us today with any questions.

Contact Us

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