

## LCFS Verification services

Keeping **you** ahead of the game, by keeping **you** in-the-know

### Low Carbon Fuel Standard (LCFS) Implementation Series #10

This is the tenth 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 here](#).

The public comments from both the comment period and public hearing are all posted to [CARB's website](#). We at Christianson are holding additional phone calls with CARB staff and encourage you to review the relevant public comments in anticipation of additional summer workshops.

As we await the upcoming workshops and discussion, I would like to point out one additional item that is different between the verifications and the RIN attest, which will pertain to contracting your verification provider.

As we all know, we are in the final two weeks of the RIN attest deadline which will be due June 1, 2018. It is not uncommon for us as attest providers to hear from a couple of new clients or even existing clients that will sign their contract and complete their RIN attest within the last two weeks before the deadline. The LCFS verification contracts will require much more planning than the RFS allows.

The process of contracting a verification body ("auditor") begins with a Conflict of Interest Assessment. Before any work can be started pertaining to the LCFS verifications, the auditor must be authorized in writing by the Executive Officer to provide the services. To do this, the auditor must submit a self-evaluation of the potential for any conflict of interest. The Executive Officer will notify the auditor when the evaluation information is complete and then has **20 days** from that date to make a determination.

Once the conflict of interest approval is received then a Notice of Verification Services must be completed and submitted to the Executive Officer. This Notice of Verification Services includes detailed information about the audit team, the schedule including site visit dates and the procedures expected to be performed. The site visit must be scheduled at least **14 days** after receipt of the Notice of Verification Services.

Based just on waiting periods for these two forms, a plant is already looking at 34 days lead time for contracting a verification body. In addition to that, extra time also needs to be accounted for to prepare the forms and at least in the first year to correct or provide any additional information that CARB deems necessary. Therefore, you should plan to be contracting your verification body and obtaining CARB approvals at least 60 days prior to the date that you want to begin work on the LCFS verification.

One last point on Christianson's expected service offerings: We have spoken with CARB about doing the LCFS verifications on a quarterly basis to coincide with your quarterly RFS RIN attest engagements and CARB was onboard with offering quarterly verifications. If you think you may want to complete these verifications on a quarterly basis (which is optional), then you would need to look at contracting your auditor at least 60 days prior to work beginning on Q1 2020 data (shoot for working on verification contracts in November/December 2019).

Please feel free to reach out to [Kari Buttenhoff](#) at 320-235-5937 for additional information on the LCFS.

Finish up your RIN attest if you haven't already and then have a great start to your summer and keep an eye out for our next LCFS Implementation Series email!

[Call or Contact Us](#) today with any questions.

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## Contact Us

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