

## LCFS Verification services

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

### Low Carbon Fuel Standard (LCFS) Implementation Series #12

This is the twelfth 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](#).

We are already approaching the end of summer and Christianson has been busy attending CARB workshops and holding private calls with CARB in our efforts to effect changes to the proposed regulation. The most recent workshop hosted by CARB was held this last Wednesday, August 8, 2018.

The workshop discussed a second set of changes to the proposed regulation, which were released last night. The release of these amendments opened up a 15 day public comment period which will close on August 28, 2018. ***This is your last chance to get any final points or suggested changes to CARB before this version of the rule goes to the board for its final hearing and potential approval.***

Below is a summary of the proposed changes related to the verification portion of the regulations. Once again, a 15 day public comment period will start once the regulation is released.

#### Verification Rule Changes

1. In our [previous webinar](#) that summarized the initial proposed rule, we discussed a waiver period for certain high conflict of interest items that would reduce these conflicts to a moderate conflict that can be mitigated. This waiver period was previously extended by one year to January 1, 2023. CARB is suggesting to further extend this period to August 31, 2023 to allow for completion of the 2022 compliance year verification.
2. Also in the conflict of interest section, part C of the high conflicts states that consultative engineering and technical services related to development and construction of a plant, energy efficiency project, or other GHG reduction project would be considered a high conflict and prohibit LCFS verification. CARB is suggesting to add this to the waiver period for services that will not be a part of the verification process.
3. CARB has suggested some further clarification on the requirements for an entity that is below the reporting thresholds and deferring its verification.
4. CARB has also clarified that specified source feedstocks that don't require CI monitoring (mainly temporary pathways and look up table pathways) would be reviewed during verification of the Quarterly Fuel Transactions Reports

In addition to these items, Christianson has been discussing voluntary preliminary verification procedures with the CARB team. A number of clients have already reached out to complete some procedures that will be similar to the verification process in order to determine if the proper documentation is in place for when the program goes live. Currently CARB has noted this as a high conflict which would prohibit us from doing the verification when the program starts. We are still having discussions around this to hopefully be able to offer this valuable service to our client base, and we need your help to make these changes happen.

Please consider making your voice heard on these and any other issues pertaining to this proposed rule by submitting a final set of public comments during this upcoming 15 day comment period. Following the public comment period the proposed rule will be sent for a second board review and hopefully approval of the regulation for implementation on January 1, 2019.

Please feel free to reach out to Kari Butenhoff at 320-235-5937 for additional information on the LCFS and other changes that were made to the proposed rule and covered in the August 8, 2018 workshop.

We are currently reviewing the release from last night. Be on the lookout yet this month for another implementation series email discussing the changes actually written in on this latest version of the proposed rule.

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

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## Contact Us

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