

## LCFS Verification services

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

### Low Carbon Fuel Standard (LCFS) Implementation Series #14

This is the fourteenth in a series of updates that Christianson will be providing on the status of the regulation. If you missed the previous newsletters, you can find them on our website [here](#).

As we noted in our previous email, the LCFS amendments have been approved and will be effective January 1, 2019. We are currently awaiting the final version of the regulation and final statement of reasons addressing issues from the public comment letters. There are still some key items of interest to Christianson that CARB will address in the final statement of reasons, which are expected out anytime now.

In our most recent email in the LCFS Implementation series, we briefly mentioned that those with approved pathways should begin working on a Monitoring Plan for the LCFS amended rule. We noted that this Plan will not be submitted to CARB for approval, but rather will be used by the third party verifiers (auditors) in completing your verification work. Below are summarized information requirements for these plans, please see the final amendments for full details.

- Information about the entity, facility or project and participation in other markets and third-party audit programs.
- References to management policies and practices applicable to LCFS reporting and recordkeeping.
- Explanation of processes and methods used to collect data for reporting under the LCFS
- Explanations of source data to compile summary reports of intermediate and final data for reporting under the LCFS.
- One or more block diagrams that show locations and positions of measurement devices and sampling locations (must include storage tanks or raw material, WIP and finished products, fuel sources, and combustion units).
- Clear identification and descriptions of all measurement devices supplying data for LCFS reporting including how accuracy of such devices is demonstrated.
- Description of the procedures used for quality assurance, maintenance and repair for all continuous monitoring systems, flow meters and other instrumentation.
- Original equipment manufacturer documentation or other documents identifying instrument accuracy and required maintenance and calibration.
- Dates of device calibration or inspection and the next required calibration/inspection date or requests for postponement of calibrations and explanation of how date will be maintained.
- Listing of equations used to calculate flows in mass, volume or energy units of measurement and equations from which non-measured parameters are obtained and a description of the calculation of weighted average transport distance.
- Identification of job titles and training practices for key personnel involved with LCFS data.
- Records of corrective and subsequent preventative actions take to address past findings from a verifier or CARB.
- Log of modifications to fuel pathway report done in response to verifier or CARB staff findings.
- Written description of an internal audit program for LCFS reporting if one exists.
- Methodology to allocate the produced fuel quantity to each certified FPC.
- Explanation of the process and method to collect all data inputs on the Fuel Pathway Report or Application.
- Steps taken and calculations made to aggregate data into reporting categories.
- Methodology for assigning fuel volumes by FPC if not using a CARB suggested method or indication of suggested CARB method being used.
- Methodology for testing conformance to specifications for feedstocks and produced fuels.
- Methodology for monitoring and calculating weighted average feedstock transport distance and modes and fuel transport distance and modes.
- References to contracts and accounting records that confirm fuel quantities were delivered into California for transportation use.

Please Save the Date for our upcoming and final session in our [Biofuels Financial Conference \(BFC\) Webinar Series](#). Christianson's final session of the BFC webinar series is "[Preparing for LCFS Verification Implementation.](#)" In this session, Kelly Davis from RFA will give an amendment package update and also discuss work being performed to open the E15 market in California, followed by a presentation by Kari Battenhoff here at Christianson on the verification portion of the rule and some key timeline items that producers of renewable fuel should keep in mind. There is a \$100 registration fee for this webinar. Please visit our BFC webpage for further information or [register here](#). You can also register to view webcasts for any prior session of our 2018 web series.

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

