



## LCFS Verification services

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

### Low Carbon Fuel Standard (LCFS) Implementation Series #15

This is the fifteenth 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](#).

Season's greetings from Christianson. As we come into this already busy holiday season, we have also been tackling various questions pertaining to the new LCFS amendment, which will take effect January 1, 2019.

Since our last implementation series email, a number of events and important meetings have taken place to bring further clarification to the new rule. Below is our end of year recap of the most important items to keep in mind as we move into the new year and the new regulation.

- Beginning on January 1, CARB will be accepting GREET 3.0 pathway applications. We have not yet seen the guidance and checklists on what CARB will be requiring as supporting documentation with the new applications, but expect to see that information in early January. Please also note that any pathways that are currently under review for approval at the end of this year and do not receive final approval by December 31 will need to be resubmitted in 2019 under the new GREET 3.0 model. Transition to the new GREET 3.0 model is not required for existing pathways until January 1, 2021.
- Any pathway applications submitted in 2019 will continue to be reviewed and validated by CARB, and will also require submission of all supporting documentation for the 2 year model. Beginning with applications submitted in 2020, validation will be completed by a verification body (third party auditor).
- We suggest that regulated parties start developing Monitoring plans in 2019. In our last LCFS Implementation Series email we summarized the requirements of the monitoring plans. While new pathway applications in 2019 will not require a submittal of a full verification plan, you will need them complete in 2020 to submit to your verification body (auditor).
- Applications for verification body and verifiers accreditation will be made available in early 2019, with verifier (auditor) training scheduled for early summer. Shortly after the accreditation training a list of accredited verifiers will be posted on CARB's website. Christianson is planning to become an accredited verifier and will plan to begin verification procedures for those electing to utilize the quarterly verification option, in Q4 2019. We are open to discussing and evaluating conflict of interest requirements at this time if you are planning to utilize Christianson for your LCFS verification.
- We have clarified some rules surrounding verifications for multiple facility entities. A verification statement (audit report) must be completed for each facility that holds an approved CI. Multiple pathways for a single facility may be included in one report. In addition, if the pathway holder is also involved in quarterly transactions that require reporting, then a separate verification statement on the Quarterly Transactions Data must also be filed. There are elections available to defer the verification requirements if you have generated credits or deficits below a certain threshold. Please contact Christianson for more information on verification deferral.
- Please remember that beginning with the 2019 compliance year, pathway holders will now have reporting requirements under the LCFS whether or not they are a credit generator. All pathway holders will be required to submit an annual CI report showing the prior two calendar years of GREET model data. If you believe you will be electing to complete verifications on a quarterly basis then you will need to submit the CI reports on a quarterly basis as well.

Christianson will be offering an LCFS interim procedures service to evaluate your LCFS compliance prior to the start of the actual verification program in 2020. Please watch next week for more details on this new service!

If you have any questions as we approach the implementation date in a little over a week, or as we begin next year under the new regulations, please feel free to reach out to [Kari Buttenhoff](#) at 320-235-5937 for additional information. Thank you for allowing us to be a part of your LCFS tool box and we wish you and your families a very blessed Christmas and a Happy New Year!!

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