



CHRISTIANSON

CPAs & Consultants

Joint Applications & Intermediate Facilities

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Introduction

- What is site-specific and user-defined data?
- What are Intermediate Facilities and Joint Applicants?
- What is the difference between the two?
- What are the advantages (and disadvantages) of them?



Site-specific Data & User-defined Data

- CA GREET 3.0 default values are conservative
- User-defined values can come from the biodiesel producer and replace default values
- User-defined values can also include site-specific data and come from feedstock suppliers

Section 2. Information for UCO Production	
2.1 Select Sources of UCO	U.S.
2.4 Select Oil Rendering	User Defined

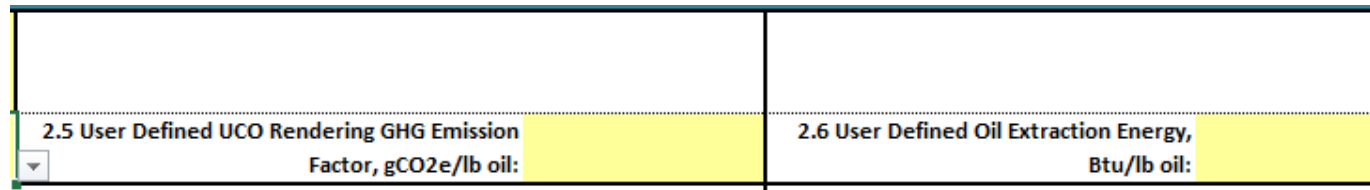


Section 2. Information for Tallow Oil Production	
2.1 Select Sources of Tallow	U.S.
2.4 Select Oil Rendering	User Defined



Site-specific Data & User-defined Data

- Feedstock Processing Energy and Emissions Factors (EFs) are key user-defined values that can have major impacts on a biofuel facility's CI score
- Examples
 - Tallow default carbon intensity gCO₂e/lb. oil = 303.82
 - UCO default carbon intensity gCO₂e/lb. oil = 90.44
 - Tallow default rendering energy Btu/lb. oil = 3944
 - UCO default rendering energy Btu/lb. oil = 1073



2.5 User Defined UCO Rendering GHG Emission Factor, gCO ₂ e/lb oil:	2.6 User Defined Oil Extraction Energy, Btu/lb oil:
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Site-specific Data Reporting

- Multiple entities may contribute site-specific data to a single fuel pathway application
- Can either designate a single entity as the pathway applicant (Intermediate Facility) or designate multiple entities (Joint Applicants) on a single pathway
- Decision on whether the time and effort is worth the reward



Intermediate Facilities

- Entities in the supply chain that contribute site-specific data to the fuel pathway CI score
- Tied to the fuel producer and are not independently validated
- Must be registered in AFP by the biofuel producer
- Produce components of a fuel or intermediate chemical
- Includes feedstock-processing facilities AKA aggregators/collectors/collecting points
- Site visit is required for each fuel pathway they are a part of

Joint Applicants

- Two entities+ are the Joint Applicants in the fuel pathway applications
- Allows each entity to maintain control of their validation and confidential data for the portions of the pathway they submit
- Optional except for 2 situations: using CCS or directly-supplied low-CI process electricity



Joint Applicants

- Joint Applicants are independently validated and subject to all the requirements for pathway application, attestations, validation/verification, and recordkeeping under LCFS for the portion of the pathway they control.
- Monitoring Plans requirements § 95491.1(c) apply
- Only one site visit annually as part of initial validation and subsequent verifications
- Joint Applicants are linked to the biofuel producer but can be a Joint Applicant with multiple producers



Guidance on Applications



- Intermediate Facilities: [Low Carbon Fuel Standard Guidance 20-01](#)
- Joint Applicants see [Low Carbon Fuel Standard Guidance 20-02](#)
- The feedstock supplier joint applications *usually* follow the biofuel producer(s) they are applying with

Guidance on Applications

- There are no CI Calculator templates or instructions for feedstock supplier joint applications
- Require using a GHG specialist who is familiar with the full GREET model to build a custom feedstock CI calculator that can determine the CI score of the facility correctly



Trends & Tips – Intermediate Facilities

- Biofuel producers need to prep their suppliers
- Requires tracing back to point of origin = CBI for most suppliers
- Requires site visit
- Time-consuming process

Trends & Tips – Feedstock Joint Applicants

- Consult with CARB early and often
- Unique situations require CARB approval and Operating Conditions
- Maximizing low CI score takes time and efforts



Trends & Tips – Feedstock Joint Applicants



- Conservative measures can be taken so your facility fits the models
- Reduces need to get time-consuming approval from CARB for unusual situations
- Example: ineligible raw materials
- Example: co-processing multiple types of raw materials with different EFs without separate energy meters or CARB approval

Trends & Tips – Feedstock Joint Applicants

- Monitoring Plans – often the source of a lot of NCs
 - These are typically new compliance requirements for feedstock companies
- Calculator specifics
 - Inventories of raw materials and finished goods
 - UCO refined finished goods reported as is
 - Tallow and meal co-product must be adjusted moisture
 - All energy usage must be reported, including alternate fuel, biomass boilers, etc.



Trends & Tips – Feedstock Joint Applicants

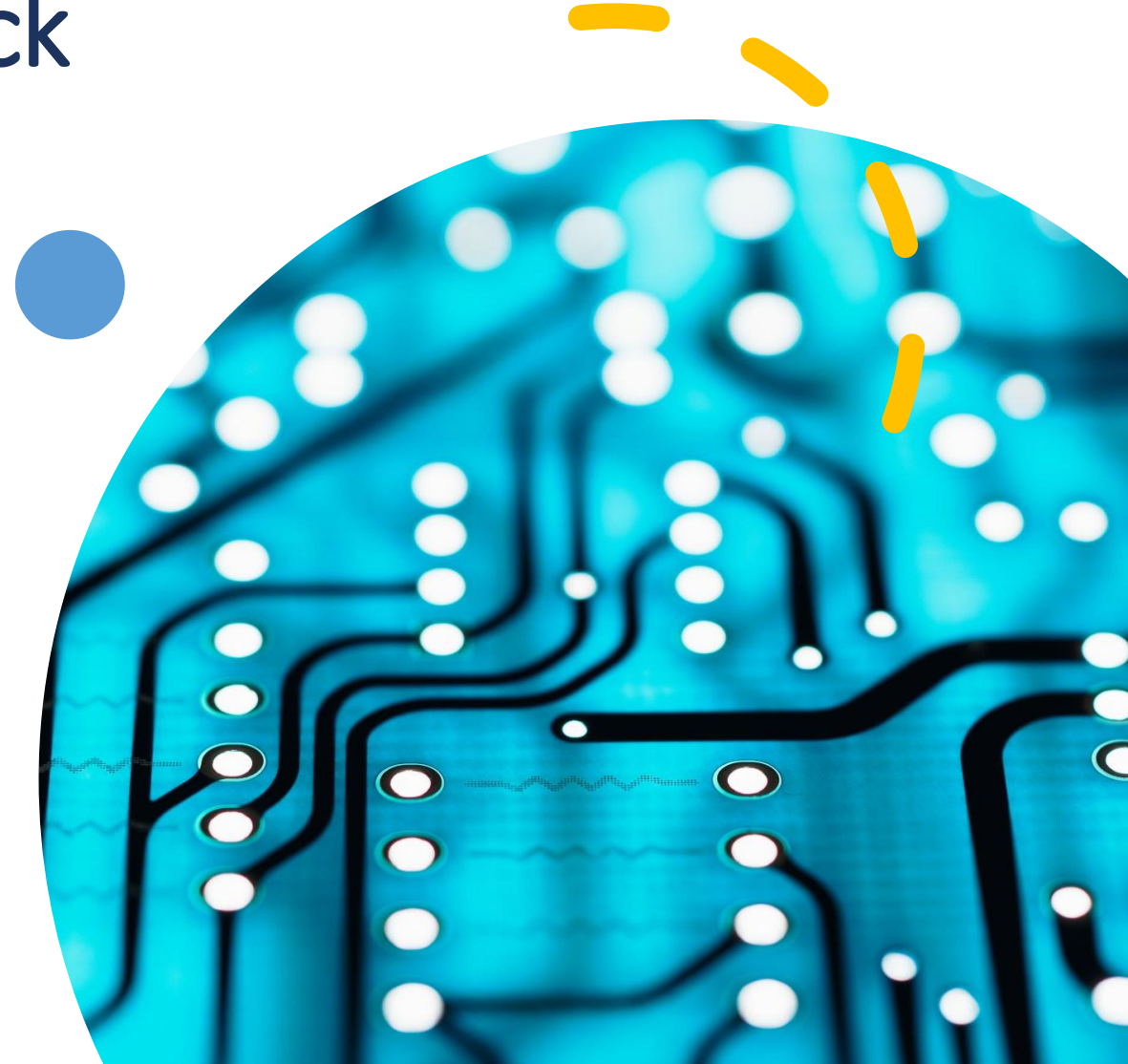


Raw material transportation:

- Tallow – the point of origin is the rendering facility
- UCO – weighted average transportation requirements just like self-rendering biofuel producers
- Original UCO route collection logs must be retained as original support/data sources

Trends & Tips – Feedstock Joint Applicants

- Specified source feedstock tracing
 - Tallow – rendering facility is the POO, no upstream tracing for tallow, simply material confirmation with renderer
 - UCO – same tracing applies for feedstock Joint Applicants as for biofuel processor to trace raw materials back to their points of origin
 - Sort raw materials by type and its pathway into your facilities
- Sister facilities allowed with full accounting

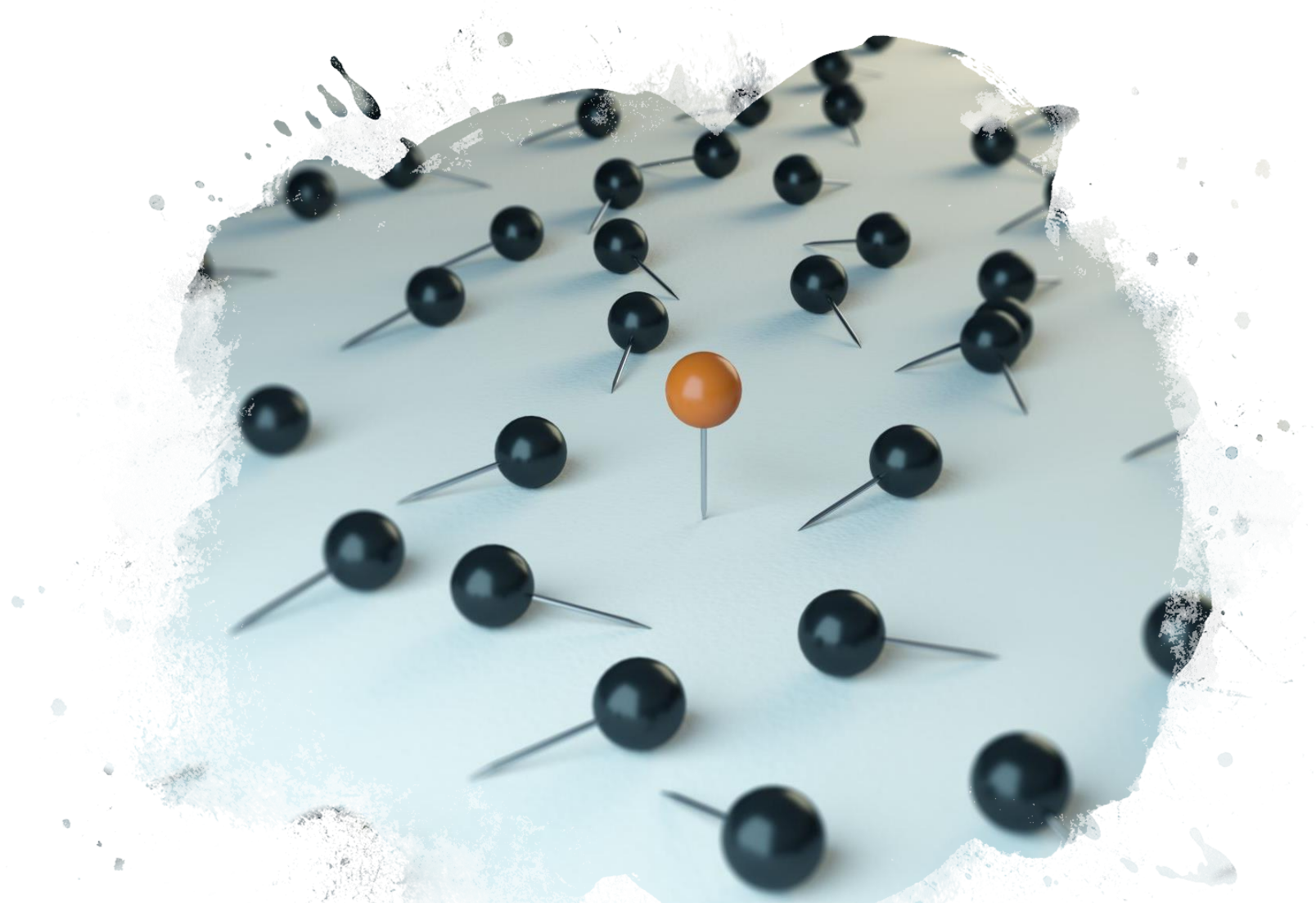


Conclusion

Reach out to CARB
before you submit your
application

&

simply be prepared to
document and explain
everything you do.





Questions

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