# Low Carbon Fuel Standard Compliance and Enforcement Working Group 2 Meeting

October 23, 2007

**California Environmental Protection Agency** 



## Agenda

Introduction Summary of Last Meeting Tracking and Reporting Issues - RINs issues Point of regulation – How to track the trading Inspection Next Meeting

### **Summary of Last Meeting**

Introduced the Objectives and Framework

Issues Directed to Working Group 1 – GHG intensity accounting

- Land use issues
- Fossil feedstocks

## Summary of Last Meeting, Cont'd

- Policy Issues Directed to Working Group 3
  - How to constraint the boundary of LCFS
  - Trading issues
  - Interaction with AB 32 and double crediting
  - Interaction with AB 1493 and double crediting
  - Enforcement challenge on Buy-out price
  - Default values
  - Electricity quantification and tracking
  - Inclusion of bunker, aviation and marine fuels

# Discussion of Tracking and Reporting System

## Issues of Renewable Identification Numbers (RINs)

What is RIN?

- A 38-character numeric code
- Generated by producers/importers
- Assigned to batches transferred to others
- How RIN is used?
  - Forms the basic currency of RFS
  - Equivalence value is the key

## **More Issues of RINs**

#### Can RINs be Used in LCFS

- Advantages
  - Currently available (Effective on Sep. 1, 2007)
  - Potential of adding GHG information
- Disadvantages

Insufficient information on GHG accounting
Separation of RINs and Renewable Fuels
Difficulties in tracking the Transactions of RINs
UC recommendations

## **Point of Regulation**

#### UC LCFS Recommendations

|                        | Liquid fuels   | Electricity   | Gaseous fuels                                     |
|------------------------|--|---|---|
| Regulated<br>Entities  | Providers:<br>•Refiners<br>•Blenders<br>•Importers                                 | Distributors of the electricity                               | Distributors of<br>the fuel                       |
| Point of<br>Regulation | Point where finished<br>gasoline or diesel is<br>first manufactured or<br>imported | Point where the<br>supply of<br>electricity to the<br>vehicle | Point where the supply of the fuel to the vehicle |

### How to Track the Trading

#### Technical Approaches

- Document all the transactions
  - Product transfer documents (PTDs)
  - Chain of custody
- Periodical reporting
- Attach all documents to the fuel
- Discussions

#### Inspection

Include Inspection in LCFS ? Sampling at distributor level Random testing Difficulties How to distinguish biofuel from blends Technical Approaches Accelerator mass spectrometry (AMS) Scintillation counting

# **Open Discussion**

### **Next Meeting**



#### Potential Issues

#### Tentative Agenda

### **For More Information**

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