



Oregon Clean Fuels Program

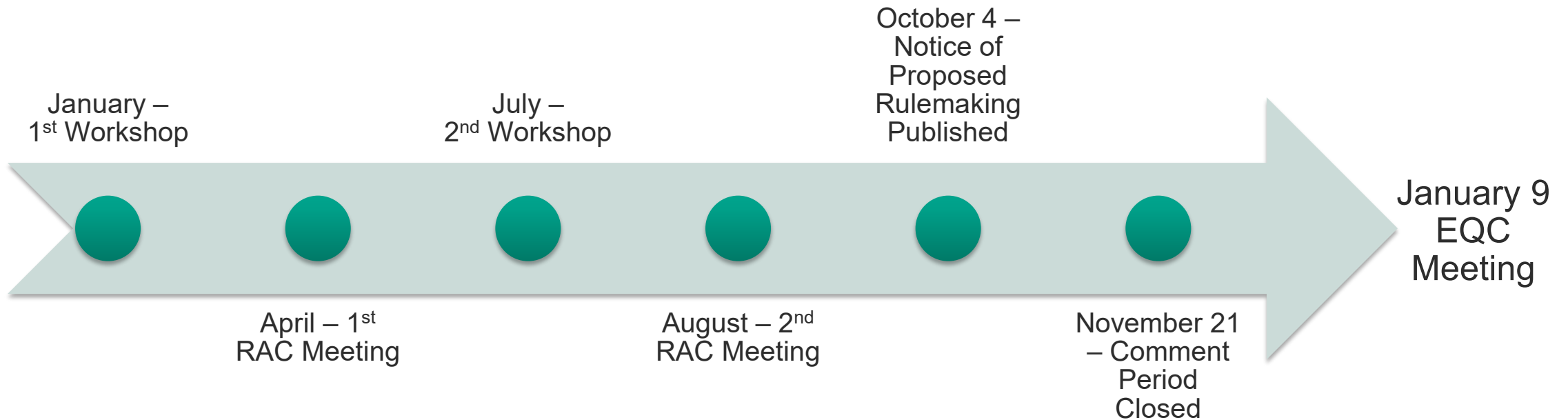
2024 Rulemaking

Oregon Department of Environmental Quality
Office of Greenhouse Gas Programs
Jan. 9, 2025

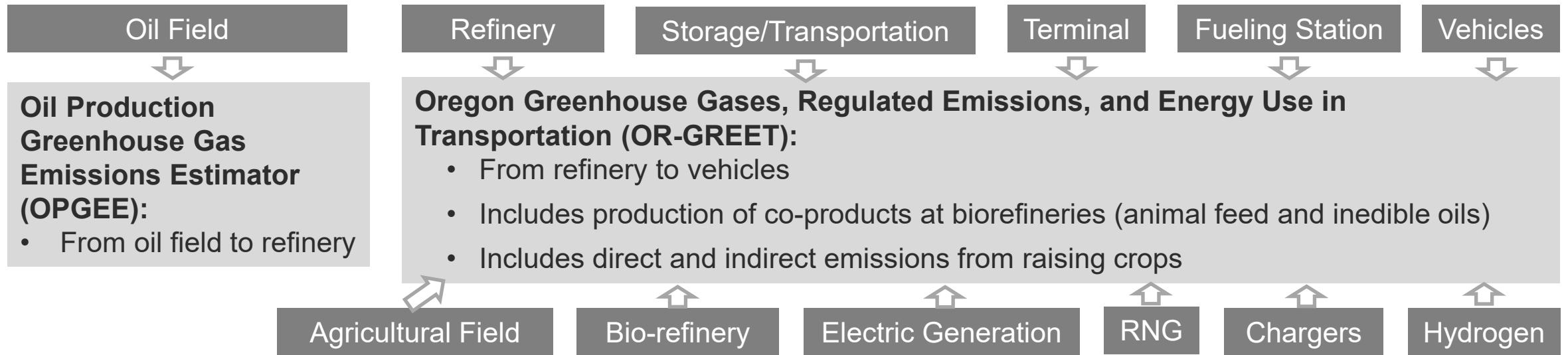
The main topics for this rulemaking

- Updating OR-GREET model
- Requiring high-risk feedstock attestations
- Third-Party Verification expansion to pathway applications and electricity reporting
- Reserve Account for Carbon Capture and Storage
- Minor rule updates and clarifications

2024 Rulemaking



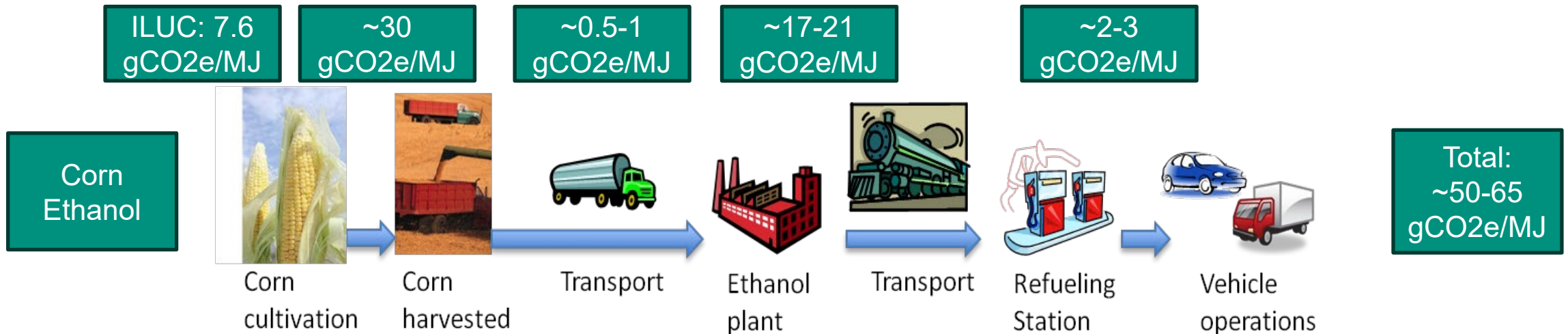
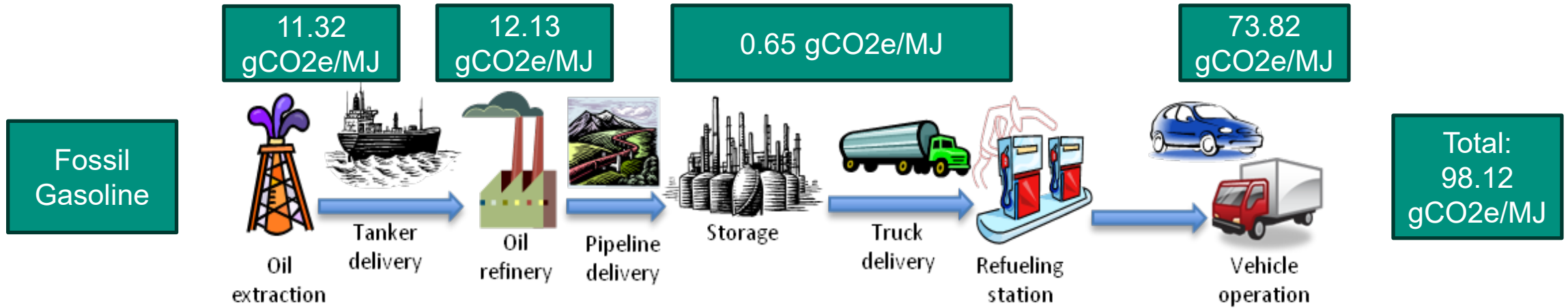
CFP Lifecycle Models



‘Simplified’ Calculators for:

- Corn Starch and Fiber Ethanol
- Sugarcane Ethanol
- Biodiesel
- Hydrotreated fuels (Renewable Diesel, Propane Naphtha, Alternative Jet Fuel)
- Hydrogen
- Renewable Natural Gas from Landfills
- Renewable Natural Gas from Wastewater Treatment Plants
- Renewable Natural Gas from Anerobic Digestion of Organic Wastes
- Renewable Natural Gas from Dairy and Swine Manure

CFP Pathways



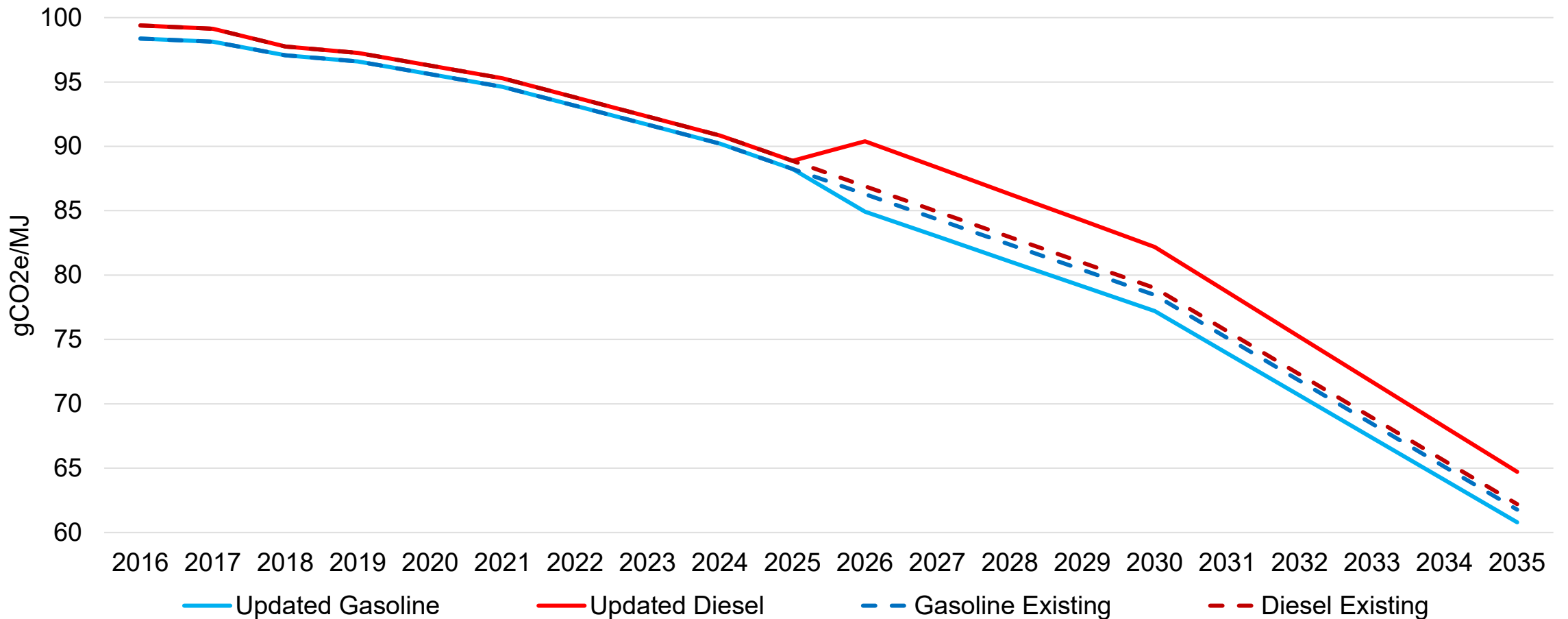
Updating OR-GREET

- Models were last updated in 2018
- Mirrors updates by California to maintain our recertification program for their pathways
- The 2025 Annual Fuel Pathway Reporting cycle will transition certified fuel pathway codes for 2026 reporting
- Changes to lookup table values and to the targets because updated baselines will take effect in 2026

Updates to baseline emissions for fossil fuels

Fuel Type	Carbon Intensity (CI) Changes	OR-GREET4.0 (gCO ₂ e/MJ)	Existing OR-GREET 3.0 CI
Gasoline	Lower emissions from improved modeling of the crude oils going into Washington's refineries	98.12	100.14
Diesel	Lower emissions from the lower crude oil CI... ...But, higher emissions from recent testing showing greater N ₂ O emissions from tailpipes of diesel engines increased overall CI	104.92	101.74
Compressed Natural Gas	Increased CI for greater methane leakage occurring at pipelines and storage infrastructure	81.89	79.98

New baselines affect program standards



Attestations for feedstock suppliers

- Fuels created with waste-stream feedstocks have lower CI values because emissions associated with creating that feedstock (farming, refining, etc.) are not included in their CI
- Lower CIs = more credits = more \$
- At a high risk of falsification
- Proposal adds requirements for attestations all along supply chain for fuels reported with “pre-used” feedstocks
- Helps ensure legitimacy of claims of pre-used feedstocks
- Example: international used cooking oil feedstock – attestations must be kept from the first point of collection to fuel production facility

Third-Party Verification: Pathway Applications

- Validation of fuel pathway applications will be required
- Only applies to original applications to Oregon
- Recertification of California-approved applications can either:
 - Use their validation statement, or
 - Most recent annual fuel pathway report's verification statement

Third-Party Verification: Electricity

- Adding requirement for electricity reporting to be required to be verified
 - Like other fuels, only those generating over 6,000 credit and deficits
 - Excludes residential EV credits
- Site visits beyond recordkeeping location left to discretion of the verifier

Reserve account for CCS projects

- CCS: Carbon Capture and Sequestration
- Rules create DEQ-controlled reserve account
- Protect environmental integrity of credits issued for CCS projects against an unintentional release of CO₂
- If a release, DEQ would cancel credits from the reserve account instead of credits in the market
- Same risk-based methodology for contribution as California's CCS protocol
- Credits deposited into the account annually and held indefinitely
- 2029: DEQ will review if this provision needs updating

Feedback received on this rulemaking

- Requests to not require electricity verification or delay its start
- Changes to OR-GREET or the scope of the lifecycle analyses
 - Climate smart agricultural practices
 - Book-and-claim renewable electricity and natural gas to fuel producers
- Extend the transition period from OR-GREET 3.0 to 4.0
- DEQ should assess and act on low credit prices

Proposed motion language

"I move that the Environmental Quality Commission adopt the proposed rule amendments in Attachment A as part of chapter 340 of the Oregon Administrative Rules."

Title VI and alternative formats

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Contact: 800-452-4011 | TTY: 711 | deqinfo@deq.state.or.us