

Application No. B0825
Staff Summary

Phillips 66 Company
Phillips 66 Rodeo, Rodeo, California
Alternative Jet Fuel, Renewable Diesel and Renewable Naphtha from Distiller's
Corn Oil, Soybean Oil, Canola Oil, Used Cooking Oil and Tallow

Deemed Complete Date: 6/18/2025
 Posted for Comment Date: 9/12/2025
 Carbon Intensity (CI) Certified Date: TBD
 CI Start Date: TBD

Pathway Summary

Phillips 66 Company ("Phillips 66") has applied for provisional certification of 51 Tier 2 fuel pathways for Alternative Jet Fuel (AJF), Renewable Diesel and Renewable Naphtha derived from Canola Oil, Soybean Oil, Distiller's Corn Oil (DCO), Tallow and Use Cooking Oil (UCO) at their facility in Rodeo, California. The Rodeo facility produces renewable diesel as a primary product, and alternative jet fuel, renewable naphtha and renewable propane/light hydrocarbons (off-gas) as co-products.

Soybean Oil is sourced from soybeans harvested in U.S. Midwest and Argentina. Canola oil is sourced from canola harvested in U.S. Midwest. DCO is sourced from various facilities across the U.S. Animal fat (Tallow) and UCO are sourced from North America as well as other regions/countries worldwide, including Asia, Europe, Africa, Oceania and South America.

Depending on the feedstock type and point of origin, feedstocks are transported to the Rodeo facility by various transport modes which include barge, ocean tanker, rail and truck.

Carbon Intensities of Fuel Pathways

The carbon intensities (CIs) are determined from life cycle analysis conducted using a modified version of the Board-approved Tier 1 Simplified CI Calculator for Biodiesel and Renewable Diesel.¹ The calculator was modified to address changes to

¹ The Tier 1 Simplified CI Calculator for Biodiesel and Renewable (August 13, 2018), incorporated by reference in the LCFS Regulation, section 95488.3(b).

calculation methodology, and to accommodate new process units, life cycle stages, or pathway inputs. The modified calculator has been determined to be equivalent to CA-GREET3.0 pursuant to section 95488.7(a)(1) of the LCFS regulation.

The applicant has provided 8 months of fuel production data from June 2024 through January 2025. The following table lists the proposed CIs for this application.

Proposed Pathway CIs				
Pathway Number	Fuel & Feedstock	Pathway FPC	Pathway Description	Carbon Intensity (gCO ₂ e/MJ)
B082501	Renewable Diesel from Soybean Oil	TBD	North American Soybean Oil transported by barge, ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	58.29
B082502	Alternative Jet Fuel from Soybean Oil	TBD	North American Soybean Oil transported by barge, ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	58.29
B082503	Renewable Naphtha from Soybean Oil	TBD	North American Soybean Oil transported by barge, ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	58.29

Proposed Pathway CIs

B082504	Renewable Diesel from Canola Oil	TBD	North American Canola Oil transported by ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline.	53.89
B082505	Alternative Jet Fuel from Canola Oil	TBD	North American Canola Oil transported by ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	53.89
B082506	Renewable Naphtha from Canola Oil	TBD	North American Canola Oil transported by ocean tanker and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	53.89
B082507	Renewable Diesel from Distiller's Corn Oil	TBD	US sourced Distiller's Corn Oil transported by barge and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	29.77

Proposed Pathway CIs

B082508	Alternative Jet Fuel from Distiller's Corn Oil	TBD	US sourced Distiller's Corn Oil transported by barge and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California barge and pipeline	29.77
B082509	Renewable Naphtha from Distiller's Corn Oil	TBD	US sourced Distiller's Corn Oil transported by barge and rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	29.77
B082510	Renewable Diesel from Used Cooking Oil	TBD	Asian Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	26.70
B082511	Renewable Naphtha from Used Cooking Oil	TBD	Asian Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	26.70

Proposed Pathway CIs

B082512	Alternative Jet Fuel from Used Cooking Oil	TBD	Asian Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	26.70
B082513	Renewable Diesel from Used Cooking Oil	TBD	Used Cooking Oil from Malaysia/Indonesia transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	31.51
B082514	Alternative Jet Fuel from Used Cooking Oil	TBD	Used Cooking Oil from Malaysia/Indonesia transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	31.51
B082515	Renewable Naphtha from Used Cooking Oil	TBD	Used Cooking Oil from Malaysia/Indonesia transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	31.51

Proposed Pathway CIs

B082516	Renewable Diesel from Used Cooking Oil	TBD	Used Cooking Oil from China transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	30.36
B082517	Alternative Jet Fuel from Used Cooking Oil	TBD	Used Cooking Oil from China transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	30.36
B082518	Renewable Naphtha from Used Cooking Oil	TBD	Used Cooking Oil from China transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	30.36
B082519	Renewable Diesel from Tallow	TBD	North American Tallow transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	33.85

Proposed Pathway CIs				
B082520	Alternative Jet Fuel from Tallow	TBD	North American Tallow transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	33.85
B082521	Renewable Naphtha from Tallow	TBD	North American Tallow transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	33.85
B082522	Renewable Diesel from Tallow	TBD	European Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	37.26
B082523	Alternative Jet Fuel from Tallow	TBD	European Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	37.26

Proposed Pathway CIs

B082524	Renewable Naphtha from Tallow	TBD	European Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	37.26
B082525	Renewable Diesel from Tallow	TBD	Tallow from Africa transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	44.28
B082526	Alternative Jet Fuel from Tallow	TBD	Tallow from Africa transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	44.28
B082527	Renewable Naphtha from Tallow	TBD	Tallow from Africa transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	44.28

Proposed Pathway CIs

B082528	Renewable Diesel from Soybean Oil	TBD	Argentinian soybean oil transported by ocean tanker to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	65.42
B082529	Alternative Jet Fuel from Soybean Oil	TBD	Argentinian soybean oil transported by ocean tanker to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	65.42
B082530	Renewable Naphtha from Soybean Oil	TBD	Argentinian soybean oil transported by ocean tanker to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	65.42
B082531	Renewable Diesel from Used Cooking Oil	TBD	North American Used Cooking Oil transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	23.44

Proposed Pathway CIs

B082532	Alternative Jet Fuel from Used Cooking Oil	TBD	North American Used Cooking Oil transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	23.44
B082533	Renewable Naphtha from Used Cooking Oil	TBD	North American Used Cooking Oil transported by rail to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	23.44
B082534	Renewable Diesel from Tallow	TBD	Asian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	42.51
B082535	Alternative Jet Fuel from Tallow	TBD	Asian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	42.51

Proposed Pathway CIs

B082536	Renewable Naphtha from Tallow	TBD	Asian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	42.51
B082537	Renewable Diesel from Tallow	TBD	Tallow from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	43.86
B082538	Alternative Jet Fuel from Tallow	TBD	Tallow from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	43.86
B082539	Renewable Naphtha from Tallow	TBD	Tallow from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	43.86

Proposed Pathway CIs

B082540	Renewable Diesel from Tallow	TBD	South American Tallow (excluding Brazil) transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	37.00
B082541	Alternative Jet Fuel from Tallow	TBD	South American Tallow (excluding Brazil) transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	37.00
B082542	Renewable Naphtha from Tallow	TBD	South American Tallow (excluding Brazil) transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	37.00
B082543	Renewable Diesel from Tallow	TBD	Brazilian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	37.91

Proposed Pathway CIs

B082544	Alternative Jet Fuel from Tallow	TBD	Brazilian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	37.91
B082545	Renewable Naphtha from Tallow	TBD	Brazilian Tallow transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	37.91
B082546	Renewable Diesel from Used Cooking Oil	TBD	South American Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	25.23
B082547	Alternative Jet Fuel from Used Cooking Oil	TBD	South American Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	25.23

Proposed Pathway CIs				
B082548	Renewable Naphtha from Used Cooking Oil	TBD	South American Used Cooking Oil transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	25.23
B082549	Renewable Diesel from Used Cooking Oil	TBD	Used Cooking Oil from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Diesel distributed in California via barge and pipeline	28.70
B082550	Alternative Jet Fuel from Used Cooking Oil	TBD	Used Cooking Oil from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Alternative Jet Fuel distributed in California via barge and pipeline	28.70
B082551	Renewable Naphtha from Used Cooking Oil	TBD	Used Cooking Oil from Oceania transported by ocean tanker and truck to Rodeo facility in California; natural gas, renewable off-gas, grid electricity and hydrogen; Renewable Naphtha distributed in California via barge	28.70

Operating Conditions

The certified CI values in the above table may be used to report and generate credits for fuel quantities that are produced at the facility in the manner described in the applicant's Life Cycle Analysis (LCA) report, and dispensed for transportation use in California, subject to the following requirements and conditions:

1. Fuel pathway holders are subject to the requirements of the California Air Resources Board's (CARB) Low Carbon Fuel Standard (LCFS) regulation, which appears in sections 95480 to 95503 of title 17, California Code of Regulations. Requirements include ongoing monitoring, reporting, recordkeeping, and third-party verification of operational CI and a controlled process for providing product transfer documents or other similar records to counterparties or CARB. All specified source feedstocks reported in the fuel production process must meet chain-of-custody requirements specified in section 95488.8(g)(1)(B).
2. The following operating condition is applicable to user-defined input values for co-products in Field 2.17.a: "Energy Density of Other Co-Products (LHV, Btu/gal)" (Cells K61 and M61 of the "RD-Production" Tab in the Tier 1 Simplified CI Calculator).

The input values shall be determined by Gas Chromatography (GC) analyses or other CARB approved method (e.g., correlation between LHV and specific gravity of renewable naphtha), and shall be reported as a Representative Value with the following constraint:

- a. The Representative Value of Energy Density shall be based upon CARB's approved sampling and analysis plan used to determine the user-defined input values for the Energy Density of Co-Products Renewable Naphtha and Alternative Jet Fuel and exported for sale. The applicant's proposed sampling and analysis plan shall take into account the variability of the facility-specific material attribute in selecting the sampling method, frequency of analysis or measurements, and the calculation method used to determine the composite, representative, user-defined input value. Results derived on a higher heating value (HHV) basis shall be converted to a lower heating value (LHV) basis using a factor approved by CARB. Input must be site-specific: results from one facility's co-product analysis may not be reported in applications or Annual Fuel Pathway Reports for any other facility's pathways.

3. Sampling and Analysis Plan

The applicant shall develop a sampling and analysis plan for each fuel production facility, to demonstrate to CARB the validity of composited values used for all relevant user-defined inputs. At a minimum, the proposed sampling and analysis plan shall include the following:

- a. Description of the material attribute(s) specified for all relevant user defined inputs (e.g., Energy Density LHV (Btu/lb) of the co-product streams.
 - b. The properties (e.g., composition, vapor pressure, density etc.) of the co-product streams.
 - c. The proposed sampling frequency, given as a number of samples per time period and per unit of fuel produced (e.g., every 100,000 gallons), to monitor the material attribute and its variability. The applicant must indicate the method of compositing collected samples with due consideration to changes in production cycles (batch runs, or continuous), changes in type of feedstock, seasonal availability of feedstocks, and disruptions to the production process (startup and shutdown).
 - d. Documentation of analytical results must identify the samples by date, type, location, and fuel production batch.
 - e. The test methods employed (standard or industry recognized) shall be described for all analytical measurements to support the use of a composited value for a user defined input.
 - f. Individual GC test results shall be averaged per the stated frequency (i.e., time period) in the Sampling and Analysis plan. Averages and variances shall be provided for each time period reviewed, and individual GC test reports shall be provided as requested by the verification body or CARB.
4. The following operating conditions are applicable to the Emissions Factors (EF) for Tallow and Used Cooking Oil (UCO) rendering (Field 2.5) of the Tallow and UCO feedstock worksheets in the Simplified CI Calculator when Tallow and the UCO are rendered and sourced from international renders outside the United States and Canada, and delivered to the renewable diesel production facility.

Site-specific energy consumption data for all rendering facilities providing tallow or UCO to the Rodeo facility, which is subject to verification, must be used to derive the EFs for each applicable country/region. If tallow or UCO are sourced from additional rendering facilities from the same country/region post-certification, the applicant must include site-specific rendering data from these additional facilities to derive the revised EFs for Annual Fuel Pathway Reports.

Barring the availability of site-specific data from all rendering facilities, the applicant shall provide, for purposes of verification, rendering energy use including energy-mix (e.g., diesel, electricity, natural gas, biomass etc.) from at least two rendering facilities for each region from where tallow or UCO is sourced.

If site-specific data cannot be provided, nor the rendering EF profile from two facilities per region established, the rendering EF shall be based upon the most conservative thermal energy requirement parameters determined by CARB. The emissions factor for electricity (gCO₂e per kWh of electricity) consumption for rendering shall be region-specific and obtained from the IEA website for the most current of data availability.

5. The Tallow or UCO rendering emission factor listed in the yellow cell G11 (gCO₂e/lb oil rendered) must include any pre-treatment of the feedstock that occurs after rendering and prior to RD production. Its value must be corroborated by adding additional worksheets in the Simplified CI Calculator that show its derivation from energy consumption, utility invoices (natural gas and electricity), meter and sub-meter readings (natural gas, steam, and electricity), and the GHG impact of chemicals in pre-treatment, if any. All supporting primary data used in the user-defined EF determination is subject to third-party verification and must be demonstrated in an externally added worksheet/tab to the Simplified CI Calculator.
6. For all specified source feedstocks reported in the fuel production process the applicant must undergo chain-of-custody verification and ensure that applicable requirements in 95488.8(g)(1) are met. In particular, the applicant must request that the verification body perform chain-of-custody verification with adequate sampling for each region supplying specified source feedstock to the fuel production facility. This entails, among other things, the VB reviewing the supply chain entities' inventory records and confirming by mass balance and/or segregation that sufficient feedstock from the relevant countries associated with the fuel pathway is available to supply to the facility listed in this application.
7. Moisture content of feedstocks used for fuel production is subject to monitoring, reporting, and verification. Either the representative method or the conservative method may be used. The representative method calculates monthly values for weighted average moisture content from financial transaction records or internal measurements by the fuel producer. The conservative method assumes feedstock moisture content is zero, based on the lower value of the range for allowable moisture content.
8. Combined Heat and Power (CHP) Allocation Method

The fuel pathway holder must use the following calculation approved by CARB as an alternate method to report monthly natural gas (inclusive of renewable off-gas) used in the CHP unit. The CARB-approved calculation must be included as a supplemental document to the Tier 2 Fuel Pathway Application pursuant to section 95488.7(a)(1) and the Annual Fuel Pathway Report pursuant to section 95500(b) of the LCFS regulation.

Natural gas/renewable off-gas used in cogeneration is allocated between steam and electricity production using the electricity and steam allocation factors derived from the efficiency method of allocation. The electricity and steam allocation factors must be calculated as follows:

$$f_{Electricity} = \frac{\frac{Electricity\ Generation}{0.35}}{\frac{Electricity\ Generation}{0.35} + \frac{Steam\ Generation}{0.8}}$$

And

$$f_{Steam} = 1 - f_{Electricity}$$

Where, $f_{Electricity}$ and f_{Steam} are the allocation factors for electricity and steam, respectively. *Electricity Generation* represents total electricity (MMBtu) produced by the gas turbine. *Steam Generation* represents the energy (MMBtu) of the steam generated from the available exhaust heat from the gas turbine.

Steam Generation is calculated based on steam flow, temperature and pressure measurements.

Since excess electricity is exported to the grid, the natural gas/renewable off-gas allocated to onsite use of steam and electricity must be calculated as follows.

$$Allocated\ NG = Total\ NG_{CHP} - Total\ NG_{CHP} * f_{Electricity} * \% Export_{Electricity}$$

Where,

Allocated NG = Allocated NG (MMBtu) for onsite use of electricity and steam
Total NG_{CHP} = Total NG used in CHP (MMBtu)
 % Export_{Electricity} = Exported electricity as % of total electricity production

Metered natural gas, renewable off-gas, electricity production, onsite electricity use and export, steam production and the allocation factors used in allocation calculations are subject to third-party verification.

9. When the on-site solar electricity equipment is installed to provide zero-CI electricity behind the meter to the fuel production facility, the applicant must report its production and use in "Elec" Tab of the modified Tier 1 calculator for the purposes of annual verification. The electricity, including the environmental attributes associated with the electricity, claimed under this pathway shall not be claimed under any other program notwithstanding the exceptions listed in LCFS Regulation section 95488.8(i)(1).

If Renewable Energy Certificates (RECs) are generated from solar electricity, the number of RECs that are associated with process energy must be retired in a WREGIS retirement sub-account named "Low-CI Process Energy at LCFS Facility [ID number]" where the LCFS Facility ID is the number assigned in the AFP at the time of facility registration. These RECs and the associated environmental attributes can no longer be sold, transferred, or claimed by any entity or for any other purpose. The WREGIS report demonstrating REC retirement must be downloaded from WREGIS and uploaded to the AFP as part of each annual Fuel Pathway Report to demonstrate the quantity of electricity from the solar equipment that is consumed within the fuel pathway and claimed to lower the CI of the produced fuel.

10. To account for transportation emissions of all finished fuels by various transport modes, a volume-weighted average transportation distance must be calculated for renewable diesel, alternative jet fuel and renewable naphtha using barge transport as proxy and entered in Field 2.20.e in "RD-Production" tab.

Staff Analysis and Recommendation

Staff has reviewed the application and has replicated, using the Tier 2 modified version of the Simplified CI Calculator, the CI values calculated by the applicant. SCS Engineers (H3-20-016) submitted a positive validation statement. Staff recommends this application be certified after all the comments received during the 14-day comment period are addressed satisfactorily by the applicant. The certification is subject to the operating conditions set forth in this document.

Comments and Certification

TBD