

Clean Fuel Standard Participation Guidance

Annual Fuel Pathway Report Requirements

Background

This guidance is intended to provide certified pathway holders with instructions on preparing annual fuel pathway reports (AFPR). All certified pathway holders must submit an AFPR. This includes Ecology certified Tier 1 or Tier 2 pathways using CA-GREET or OR-GREET calculators, as well as pathways using WA-GREET calculators. The guidance also applies to Lookup Table Pathway holders approved in Washington AFP.

The deadline for 2023 AFPR will be delayed by two weeks and must now be submitted by April 15, 2024 rather than March 31, 2024. Future reports will be due March 31st of each year.

The [AFP User Guide](#) includes detailed instructions on how to upload and submit the required information described in this document.

AFPR General Requirements

The requirements for what is included in an annual fuel pathway report (AFPR) are stated in WAC 173-424-610(9)(g)(iii). This guidance is to clarify the rule and provide additional detail. It is not intended to replace the requirements in the rule.

Each AFP must meet the same general document requirements:

- [Attestation](#) that the information provided is true and complete. An attestation must be submitted for each pathway certified in AFP.
- Documents that demonstrate the carbon intensity of the fuels produced or used for transportation purpose (mainly electricity using Lookup table pathways). These include:
 - Tier 1 or Tier 2 calculators that show the operational carbon intensity of the fuels produced.
 - Supporting documents that demonstrate the information provided in the carbon intensity calculation are accurate.
 - For Lookup table pathways, instead of the carbon intensity calculators, participants must submit supporting documents that demonstrates that the established carbon intensity was achieved.

AFPR Documentation to Demonstrate Operational Carbon Intensity

In addition to an attestation letter, the following documents are required in order to demonstrate the operational carbon intensity for each certified fuel pathway.

- **For Tier 1/Tier 2 Fuel Pathways:** The certified version of the Tier 1/Tier 2 carbon intensity calculator using the most recent two calendar years of operational data.
 - For pathways that are approved by Ecology having carbon intensity values approved by CARB or OR-DEQ, the pathway holder is required to submit the annual fuel pathway report submitted to

CARB or OR-DEQ. When the pathways are verified, the pathway holder is required to submit the verified report also, as it is available for submission to CARB/OR-DEQ.

- For pathways that are using WA-GREET calculators, the pathway holder is required to submit the annual fuel pathway report using WA-GREET calculators. While Ecology has the right to request third party verification as needed, we have not yet established a Third-Party Verification program.
- **For Lookup Table pathways:** For renewable electricity that is used as a transportation fuel or for hydrogen production via electrolysis, the AFPR must include:
 - Invoices or metering records substantiating the quantity of renewable or low-carbon intensity inputs procured from a qualifying source.
 - For on-site or directly connected renewable electricity, upload records demonstrating that any renewable energy certificates (RECs) generated were retired in WREGIS for the purpose of lowering the certified carbon intensity.
 - Any offsite source of renewable electricity must meet the requirements under WAC [173-424-630\(5\)](#);
- **For biomethane injected into a natural gas common carrier pipeline and used as the feedstock for CNG, LNG, L-CNG or hydrogen production:**
 - The specific volume of biomethane claimed as being used in the fuel production process must have been injected into the pipeline.

Submitting the AFPR

Instructions for uploading the documents listed above and submitting the AFPR can be found in section 7 of the [AFP User Guide](#).

Contact

If you have questions regarding the above information, please email WFRSAdmin@ECY.WA.GOV

ADA Accessibility

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyADAcoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341