

From: Logan Caldwell [mailto:lc@hbloc.net]
Sent: Thursday, June 25, 2015 6:57 PM
To: Chowdhury, Hafizur@ARB
Subject: What is the Executive Officer likely to request for Recertifications?

Hafizur:

The 2nd 15-day notice modifications provide that portions of the normal certification requirements may not be required for recertification of existing pathways. The problem is knowing which of the requirements are likely to be needed; otherwise, there will be inefficiencies involved in the process from either providing too much or too little with applications for certification. I have summarized for the Tier 1 pathways the items that may or may not be required. It seems to me that certain items will definitely be required, for example the CA-GREET 2.0 Tier 1 model with the Tier 1 sheet completed. Another example is the fuel producer attestation letter. If these are definitely going to be needed, I would suggest rewording the language in the regulations to say so. Then, the only unknown is has to do with the invoices.

The requirements of subsections 95488(c)(3)... are not applicable to recertifications, *unless the Executive Officer specifically requests such information from an applicant.*
95488(c)(3):

95488 (c) (3)(A) ...submit the following information to the Executive Officer for processing and verification:

1. Calculation of CI with CA-GREET 2.0 T1 with T1 interface completed.
2. Invoices and receipts for all forms of **energy** consumed in the fuel production process, all **fuel sales**, all **feedstock purchases**, and all **co-products sold**. Each set of invoices shall be accompanied by a **spreadsheet summarizing the invoices**.
 - In lieu of receipts or invoices for energy consumption, fuel sales, feedstock purchases, or co-product sales, the applicant may seek Executive Officer approval to submit audit reports prepared by independent, third-party auditors that document energy consumption, fuel sales, feedstock purchases, or co-product sales.
3. LCFS Fuel Producer Attestation Letter

Clarifying this point should make the process smoother for all concerned.

Regards,
Logan

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