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California LCFS – RD Calculator
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To California Air Resources Board Staff

Submitted Electronically via On-Line Public Comment Form

California LCFS 2023 Rulemaking – Renewable Diesel Calculator

Dear CARB Staff,

Phillips 66 Company (Phillips 66) appreciates the opportunity to comment on the proposed CARB Renewable Diesel (RD) Carbon Intensity (CI) Calculator.

Phillips 66 produces and supplies petroleum fuels and renewable fuels. Phillips 66 is expanding the production of renewable fuels at its Rodeo facility near San Francisco. Phillips 66 also operates a petroleum refinery in Los Angeles and several fuel terminals in the state, and markets products under the 76® brand. Phillips 66 is a member of the Western Petroleum States Association (WSPA).

The proposed RD Calculator, under section 5 of the “HEFA Production Inputs” tab, would now require selecting if the “Light Hydrocarbons” are used for process energy, feedstock for hydrogen production or feedstock for other products. The resulting CI scores are different if “process energy” or “feedstock for H2 production” is selected. However, in both cases, the Light Hydrocarbons would displace the same amount of natural gas and there would be no difference in greenhouse gas emission reductions if the natural gas is displaced in the hydrogen plant or at another unit.

Therefore, the Calculator should be corrected to provide the same energy displacement credit if “process energy” is selected as if “feedstock for H2 production” is selected. Please adjust the RD Calculator accordingly.

Thank you for your consideration.

Sincerely,

Marc Ventura

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