Oregon Clean Fuels Program and Greenhouse Gas Reporting Program

2021 Oregon Fuel Reporting System Updates

Training for Organizations Reporting to Both CFP and GHG RP

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Overview

- Review changes to online reporting system for entities that report to **both** the CFP and Greenhouse Gas Reporting Program (GHG RP)

- Review sign up and reporting process for CFP and GHG RP

- Common Reporting Issues

- New documentation available

- Questions will be taken at regular intervals as we discuss different aspects of the system and reporting

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System Update - Background

- System update to streamline reporting of fuels to the CFP and the Greenhouse Gas Reporting Program (GHG RP) into one combined system

- New elements were added into the system from California's recent updates

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System Update – Phased Implementation

- Phase 1: New transaction types for quarterly reporting in CFP to collect data for GHG Reporting Program
  - These have been in use for 2020 reporting

- Phase 2: New reporting elements for the Greenhouse Gas Reporting Program's (GHG RP) Annual Report and a few general updates to the system
  - These are in the latest update

- You will access the updated site from the same URL: https://cfprt.deq.state.or.us/

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Oregon fuels reporting updates

- The Clean Fuels Program Reporting Tool has a new name:
  - **Oregon Fuels Reporting System or OFRS**

- Entities which previously reported to the Greenhouse Gas RP through EZ-Fuels will be using the Oregon Fuels Reporting System beginning with the 2020 annual report

- The system is in the last stages of being updated and will be down for one full day on Tuesday, March 16. You should be able to use the system again on March 17. Let us know if you have any problems accessing the system after 9 a.m. on March 17.

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CFP Basics

- Reporting to the Clean Fuels program is required under OAR 340-253-0100 for:
  - **Regulated Parties**
    - All persons producing or importing into Oregon any regulated fuel: gasoline, diesel, ethanol, biodiesel, renewable hydrocarbon diesel, any blends or constituents of these fuels, and any other liquid or non-liquid transportation fuel not listed
      - If importing less than 500,000 gallons of finished fuels, considered a small importer and only required to report to GHG RP
  - **Credit generators**
    - CNG, LNG, L-CNG, LPG; Electricity; Hydrogen fuel or hydrogen blend; and Alternative Jet Fuel
  - **Aggregators**
    - Authorized by a regulated party or credit generator to act on its behalf and report to the CFP for that entity

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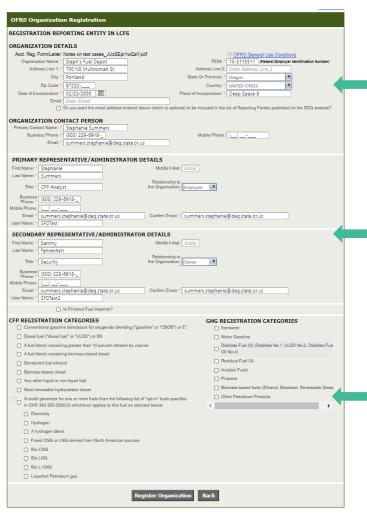State of Oregon
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New Additions – Sign in Page

- Reset Password
  - Security questions allow users to reset their own passwords

- Users reporting only to GHG RP who did not have an account in CFP will need to register as a regulated party

- Note: Registered parties reporting to CFP will need to fill out the appropriate registration form to register with the CFP before signing up to use the system.

New Additions – Registration Screen

Organization details, new required fields:
- Date and place of Incorporation
- Organization Contact Person

Primary and Secondary Representatives
- Two representatives needed
- Given Administrator role for company
- New required fields: User Names, Titles, Relationship to Organization
- Contact details

This is where those newly signing up for system will fill out the registration categories
- Those already registered in system will find this on the organization profile tab

New Additions – Organization Profile/Sign up Screen

Action Item: Organization Profiles need to be updated by all organizations

All organizations:

- Update this screen with all fuels to be reported

- Update fuels under the program you are required to report to

- Reporting to both programs?
    - Select fuels under both CFP and GHG headings, including gasoline and diesel

CFP REGISTRATION CATEGORIES

- ☐ Conventional gasoline blendstock for oxygenate blending ("gasoline" or "CBOB") or E1
- ☐ Diesel fuel ("diesel fuel" or "ULSD") or B5
- ☐ A fuel blend containing greater than 10 percent ethanol by volume
- ☐ A fuel blend containing biomass-based diesel
- ☐ Denatured fuel ethanol
- ☐ Biomass-based diesel
- ☐ Any other liquid or non-liquid fuel
- ☐ Neat renewable hydrocarbon diesel
- ☐ A credit generator for one or more fuels from the following list of "opt-in" fuels specified OAR 340-253-0200(3) whichever applies to that fuel as selected below:
    - ☐ Electricity
    - ☐ Hydrogen
    - ☐ A hydrogen blend
    - ☐ Fossil CNG or LNG derived from North American sources
    - ☐ Bio-CNG
    - ☐ Bio-LNG
    - ☐ Bio-L
    - ☐ Liqu

GHG REGISTRATION CATEGORIES

- ☐ Kerosene
- ☐ Motor Gasoline
- ☐ Distillate Fuel Oil (Distillate No.1, ULSD No.2, Distillate Fuel Oil No.4)
- ☐ Residual Fuel Oil
- ☐ Aviation Fuels
- ☐ Propane
- ☐ Biomass-based fuels (Ethanol, Biodiesel, Renewable Diese
- ☐ Other Petroleum Products

- Credit generator, aggregator, or receiving residential EV credits?
    - Select categories under the CFP Registration categories by selecting and expanding the "opt-in" section

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New Additions: Organization Profile – Designated Aggregators

Action Item: Designator Fields

Designated aggregators:
- Click Add Designators button to get the pop up to register entities you are aggregating for
- Upload Aggregator Designation form on this page
- You will need the FEIN of your designator to complete this step

If you are a new registrant, this can be filled out during registration in the system

New Additions: User Profile Tab

Action Items: New Fields

Required fields:
- Title
- Relationship to Organization
- Default Role
- Security Questions

Admin has ability to add users and to add/remove roles for users on this screen

Credit Generators/Aggregators: Registering Fuel Supply Equipment

- Updated FSE Registration Guide is available on the website on the OFRS page

- Updated FSE registration spreadsheet found on Home tab requires yes/no on if the entity registering is aggregating for another company
  - If yes, the FEIN of the company you are aggregating for is required to be uploaded in the spreadsheet for each FSE

- Propane FSE columns are now included

- Fuel Supply Equipment detail form required for:
  - Forklifts, eTRU, eCHE, and eOGV
    - Please note that eCHE and eOGV are being added in the current rulemaking going before the EQC for approval later this month and are not yet in our rules

- System now has the capability to handle start/stop dates for FSE

Reporting Process for CFP

CFP Reporting

- Remains largely the same as previous years of reporting

- Updated user guide contains detailed instructions on:
  – Adding fuels
  – Adding transactions
  – Adding Reporting Manually or by Upload
  – Submitting reporting

CFP Quarterly Reports

Reports From: Quarter 1 | 2020   To: Quarter 4 | 2020   **Go**

Year	Quarter	Change Date	Change By	Report Status	Status Comment	Is Late Submission	Begin Report	Report Details	Unlock Report Request	Submit Report
2020	4			Report has not been created		No	Begin Report			
2020	3			Report has not been created		No				
2020	2	12/14/2020	SSTest	Corrections submitted for review		Yes		Go to Report Details		
2020	1	12/13/2020	CASSLRT	Corrections have been approved by the ODEQ	accepted	Yes		Go to Report Details	Unlock Report	

View Annual Reports

Back

Only receiving Residential EV Credits? Ensure the credit balance tab will reflect an accurate credit balance:
- Submit "no transaction" reports quarterly
- Submit annual report

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CFP Reporting: Adding Fuels

Add:
- Fuel Name
- Fuel Application
- Fuel Pathway Code

Add New Fuel

Fuel Name * — Electricity ▼

Fuel Application * — Select... ▼

Fuel Pathway Code *

Select...
Heavy Duty Vehicles
HDV/Off-Road - Aerial Tram (pre-2012)
HDV/Off-Road - Fxd Gwy LR Expansion (post-2012)
HDV/Off-Road - Fxd Gwy LR System (pre-2012)
HDV/Off-Road - SC Expansion (post-2012)
HDV/Off-Road - SC System (pre-2012)
HDV-Battery EV or Plug-in Hybrid EV Bus
HDV-Battery EV or Plug-in Hybrid EV Truck
HDV-Electric Forklift
HDV-Electric TRU (eTRU)
Light Duty or Medium Duty Vehicles
LDV/MDV-Battery EV or Plug-in Hybrid EV
LDV/MDV-Electric Motorcycle

Transaction Details	Fuel Name	Fuel Pathway Code
No records to display.		

|◄ ◄ 1 ► ►| Pag

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CFP Reporting: Adding Transactions

Add:
- Transaction Date
- Transaction Type
- Transaction Quantity
- Transaction Number
- Business Partner
- Biofuel Facility, if needed
- Check the box if aggregated
- Transaction Description

CFP Fuel Transaction Details

Organization: ABC Inc.
Fuel Name: Gasoline
Fuel Obligated Amount: 0 gal

Reporting Period: Quarter 1 , 2015

Fuel Balance: 0 MT

Report Status: Corrections in progress
Fuel Pathway (CI): ORGAS001 (89.40)
Fuel Application: LDV/MDV

Transaction Details

Transaction Date *   03/31/2015

Transaction Type *   Import into Oregon

Transaction Quantity *   50,000

Transaction Number *   11bf63ce-fffc-47d5-8599-8916a

Transaction Description

Business Partner *   Undefined

Biofuel Facility   Select...

Physical Pathway Code *   Fuel produced in Oregon

Transaction is an aggregated amount ☑

Add   Cancel

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CFP Reporting: Uploading Transactions

Technical Files found on home tab can be used to enter many transactions at one time

Technical Files

XSD for XML file upload
- last updated 2/10/2021 5:06 PM
- release notes

Excel Template for file upload
- last updated 2/10/2021 5:06 PM
- release notes

Facility - Fueling Supply Equipment(FSE) Registration Template
- last updated 2/10/2021 5:08 PM

FSE XSD for XML file upload
- last updated 2/10/2021 5:06 PM

FSE Excel Template for file upload
- last updated 2/10/2021 5:06 PM

Non-FSE Reporting

FSE Reporting

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Regulated Entities/Transaction Types: Import and Position holder transactions

- Import transactions:
  - Import within the bulk system: fuel is going to a terminal or directly to a Producer to be dispensed or used for production
  - Import outside the bulk system: fuel is going to intermediate storage or directly to retail sites
    - Import (and export) transactions should tag the Undefined business partner (14-9876543)

- Position holder transactions:
  - All sales below the rack must be reported whether the fuel is staying in state or being exported
  - **Position holder sale for export**: fuel is going to be exported, tag business partner, can aggregate by business partner and month or quarter, can tag Undefined (14-9876543) business partner if that company is not registered in system
  - **Position holder sale without obligation**: fuel is being delivered in state, tag business partner or can aggregate to Undefined (14-9876543) business partner by month and quarter
  - **Purchase below the rack for export:** must be used by entity buying fuel below the rack and exporting, tag and aggregate by business partner and month or quarter, and must also use an Export out of Oregon distribution system transaction for those gallons

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Position holder sale transaction example:

- If Company B buys fuel below the rack from Company A and then exports it out of state:

  - Company A reports this as a Position holder sale for export and selects Company B as the business partner in the transaction

  - Company B reports the transaction as a Purchase below the rack for export and selects Company A as the business partner

  - Company B also enters another transaction "Export out of the Oregon distribution system" and selects the Undefined business partner for that transaction

Regulated Entities/Transaction types: Purchase/Sale with/without Obligation

Purchase or Sale with or without obligation
- Use for:
  - Transactions above the rack
  - Sales below the rack going to in state Producers
    - Producers will report their sales as Position holder sales
  - Sales below the rack going to exempt uses
  - "Flash sales"
    - Seller owning fuel in terminal reports as Sale with or without obligation
    - Second party owns fuel momentarily before selling to entity picking up below rack
    - Second party reports sale to third party using one of the Position holder transaction types and must tag business partner
    - Third party reports purchase if the fuel is being exported as Purchase below the rack for export

Regulated Entities/Transaction types: Purchase/Sale with/without Obligation

Purchase with or without obligation and Sale with or without obligation example:

- Company A sells fuel to Company B at the rack and Company B immediately sell it to Company C, who is buying it below the rack and indicates it will be delivered it in state

- This is a "flash sale"
  - In this case, Company A reports the sale to Company B as a Sale with or without obligation and selects Company B as the business partner
  - Company B reports the purchase as a Purchase with or without obligation and selects Company A as the business partner
  - Company B reports the sale to Company C as a Position holder sale without obligation and selects Company C as the business partner
  - Company C would not be required to report the purchase, as it is being delivered in state

- Company C ends up delivering the fuel out of state instead of in state
  - If Company C ended up delivering the fuel out of state after the purchase, Company C informs Company B of that change or the companies would discover the discrepancy during the reconciliation period
  - Company B updates the transaction in their reporting as a Position holder sale for export
  - Company C updates their reporting to Purchase below the rack for export and adds an Export out of Oregon distribution system transaction for those gallons

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CFP Reporting: Reconciling with Business Partners

- For those reporters reporting transactions with business partners, the second half of the 3 month reporting period for each quarter should be used to reconcile transactions with those business partners

Home	User Profile	Org Profile	Buy (0) & Sell (0)	Credit Transfers	Credit Balance	Partners	Producers	FPC	CFP Reports	Annual Reports	Data

RptReviews	Facility-FSE	Registered FSE

Welcome: Stephanie Summers for Electric Bugaloo

Standard Reports

Reports : Reconciliation: RP & Bus. Partner ▼ **Quarter** (optional) : Quarter ▼ **Year :** Year ▼ **View Report**

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Submit screen: CFP Quarterly Report

Once transactions are submitted, use the submit button on the CFP Reports tab to submit for the reporting period

Aggregated quarterly volumes for GHG Annual Report

Fuel Type	Transaction Type	Total Volume in Gallons
Renewable Diesel	Import outside of the bulk system	30000
Gasoline	Import outside of the bulk system	400000
B5 Diesel	Import outside of the bulk system	400000
B20 Diesel	Import outside of the bulk system	800000
E10 Gasoline	Import outside of the bulk system	300000

Page size: 10 ▼   5 items in 1 pages

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Submit screen: CFP Annual Report

- Annual Report tab

- Summary of all 4 quarters and an annual summary table

- Check the accuracy confirmation box and click Submit Annual Report

| Home | User Profile | Org Profile | Buy (0) & Sell (0) | Credit Transfers | Credit Balance | Partners | Producers | FPC | CFP Reports | Annual Reports | Data |

| RptReviews | Facility-FSE | Registered FSE |

Welcome: Stephanie Summers for Electric Bugaloo

Annual Reports

	Clean Fuels Program			
	Year	Due Date	Submitted	Annual Report
>	2020	04/30/2021	No	Go to Report

2020 Annual Summary :

	Credits (MT)	COH (MT)	CCM Credits (MT)	Deficits (MT)
Total Credits/Deficits (MT) Carried Over from 2019	0			0
Total Credits/Deficits (MT) in 2020	0			0
Total Credits (MT) Sold in 2020 (-)	0			
Total Credits (MT) Acquired in 2020	0			
Total Credits (MT) Purchased as Carryback Credits in 2021	0			
Total Administrative Credits Withheld /Total Administrative Credit Holds (MT) in 2020 (-)	0	0		
Total Credits (MT) Pending Sale in 2020 (-)	0			
Total Credits (MT) Exported in 2020 (-)	0			
Total Credits (MT) Retired in 2020 (-)	0			0
Total Credits (MT) Pledged for CCM in 2020 (-)	0		0	
Total Credits/Deficits (MT) Carried to 2021	0			0

| Other Credits (MT) Pending in 2020 | 0 | | | |

I confirm the accuracy of my 2020 Annual Report submittal in the LRT System. ☐

Upload Documents

Comments

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Greenhouse Gas Annual Report

Fuel Suppliers and In-State Producers

- Required to report emissions from combustion of <u>all</u> fuels supplied within Oregon (OAR 340-215-0110)

- Emissions quantified using methodology in 40 C.F.R. part 98, subpart MM for CO_2 emissions and subpart C for CH_4 and N_2O emissions

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Current Reporting Requirements

Applicability

- Applies to all fossil and biomass-derived fuel types

- Applies to any person who:

  1. Is subject to the Oregon Motor Vehicle and Aircraft Fuel Dealer Tax
  2. Is subject to the Oregon Use Fuel Tax, **OR**
  3. Produces, imports, sells, or distributes at least 5,500 **gallons** of gasoline, distillate fuel oil, biofuels, or aircraft fuel (or 10,500 **gallons** of propane) in a year.

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Current Reporting Requirements

Applicability

- To reduce duplicative reporting and compliance costs, DEQ only requires reporting from two categories of supplier:

1. **Position Holders**: Company that disburses fuel from a terminal

   Terminal: Large fuel storage and distribution facility, generally supplied by a pipeline, rail, or vessel.

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Current Reporting Requirements

Applicability

- To reduce duplicative reporting and compliance costs, DEQ only requires reporting from two categories of supplier:

2. **Fuel Importers**: Company that imports fuels from outside Oregon.

   - Only applies to fuels that do not go to a Terminal
   - Most often applies to fuel imported by truck

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Greenhouse Gas Annual Report

- New transaction types transfer data from CFP reporting to GHG reporting

  - "Position Holder Sale Without Obligation" →

    "**Position Holder**"

  - "Import Outside the Bulk System" →

    "**Fuel Importer**"

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Greenhouse Gas Annual Report

Key Reporting Changes:

- All volumes reported in gallons (not barrels)

- Separately add any non-CFP fuels
  (e.g. propane, aviation fuel)

- Blended fuel types must be input separately

100 gallons of B20 = 80 gallons of diesel + 20 gallons of biodiesel

Greenhouse Gas Annual Report

How to Report

Greenhouse Gas Annual Report

Select gasoline type

Greenhouse Gas Annual Report

Aggregated Volumes from your CFP Quarterly Reports

Position Holder (Gasoline)

+ Add new record

Fuel Type	Fuel Amount (gal)	Anthropogenic Emissions (MTCO2e)				
		CO2	CH4	N2O	Total	
Gasoline formulation unknown	5000 gal	44.80	0.05	0.12	44.96	
Conventional summer regular	5000 gal	44.68	0.05	0.12	44.85	Edit
Total	**10000 gal**	**89.48**	**0.1**	**0.24**	**89.81**	

Specified fuel type is removed from the unknown total

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Greenhouse Gas Annual Report

Biofuels are listed together at the bottom of the CFP aggregate data

Other Fuels						⌃
Supplier Type	Fuel Name	Fuel Amount (Gal)	Biogenic Emissions (MTCO2e)	Anthropogenic Emissions (MTCO2e)		Total (MTCO2e)
			CO2	CH4	N2O	
Fuel Importer	Biodiesel	500	4.71	0.00	0.00	4.71
Position Holder	Biodiesel	2000	18.84	0.01	0.01	18.86
Fuel Importer	Ethanol	1000	5.77	0.00	0.00	5.77
Position Holder	Ethanol	0	0.00	0.00	0.00	0.00
	Total	**3500**	**29.32**	**0.01**	**0.01**	**29.34**

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Greenhouse Gas Annual Report

Reporting GHG-only fuels

Greenhouse Gas Annual Report

Reporting GHG-only fuels

Greenhouse Gas Annual Report

GHG Reporting

+ Add new record

Supplier Type	Fuel Type	Fuel Amount (Gallons)	Greenhouse Gas Emissions (MTCO2e)				Total MTCO2e
			Anthropogenic Emissions			Biogenic Emissions	
			CO2	CH4	N2O	CO2	
Fuel Importer	Aviation gasoline	10000 gal	83.10	0.09	0.21	0	83.39

Greenhouse Gas Emissions (MTCO2e)				Total MTCO2e
Anthropogenic Emissions			Biogenic Emissions	
CO2	CH4	N2O	CO2	
There are no records to display				

Save   **Submit**

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What to check for when reporting and submitting

- Make sure transactions are behaving as you would expect for CFP reporting and GHG reporting

- Check the "Aggregated quarterly transactions for GHG Reporting" table at the bottom of the **Submit** screen of the CFP quarterly report to ensure fuels are summing correctly

- When submitting CFP quarterly report, review for correctness, reconcile with business partners, and submit – do the same when submitting the CFP annual report

- When submitting GHG annual report, add data as requested/needed, review for correctness and submit

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Important Reporting Dates

CFP Program

Report	Period Covered	Deadline
First calendar quarter	January - March	June 30
Second calendar quarter	April - June	September 30
Third calendar quarter	July - September	December 31
Fourth calendar quarter	October - December	March 31
Annual Report	**January – December**	**April 30**

GHG Program

Annual Report	**January – December**	**April 30**

Common Reporting Issues

CFP Reporting

- Not including import or position holder transactions
- Position holders not reporting below the rack sales for volumes staying in state
- Below the rack exporters not reporting Export out of Oregon Distribution system for those gallons
- Not reconciling with business partners before submitting report

GHG Fuels Reporting

- Position Holder vs.

  Fuel Importer

Resources

CFP Reporting

- OFRS Reporting Guide

- FSE Registration Guide

- FSE Detail Form

- FAQ

Greenhouse Gas Reporting Resources and Forms

- Reporting Protocol

- How to Determine Fuel Type

- OFRS User Guides

Questions?

CFP Reporting

GHG Fuels Reporting

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