

Marc Ventura

See attached comment letter from Phillips 66 Company.



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Washington State Department of Ecology
Air & Climate
Clean Fuel Standard

Submitted Electronically via On-Line Public Comment Form

RE: Comments on Proposed Temporary Fuel Pathways for Renewable Naphtha and Renewable Gasoline/Renewable Gasoline Blendstock

Phillips 66 Company (Phillips 66) appreciates the opportunity to comment on the proposed temporary fuel pathways for renewable naphtha and renewable gasoline/renewable gasoline blendstock under the Washington Clean Fuel Standard (CFS) regulation.

Phillips 66 supports the creation of temporary fuel pathway codes for renewable naphtha and renewable gasoline/renewable gasoline blendstock proposed by Ecology.

Temporary fuel pathways for renewable naphtha and renewable gasoline/renewable gasoline blendstock already exist in the California Low Carbon Fuel Standard (LCFS) regulation and the Oregon Clean Fuels Program (CFP). Adding these temporary fuel pathways would make the Washington CFS consistent with the California LCFS regulation and the Oregon CFP and will open the Washington market for renewable naphtha and renewable gasoline/renewable gasoline blendstock for renewable fuel facilities that do not already have a provisional or an operational fuel pathway with Ecology, such as newly operating renewable fuel facilities or existing facilities processing a new renewable feedstock.

The new temporary fuel pathways will allow incremental low carbon fuel volumes in Washington and help the CFS toward its goal of achieving a 20% CI reduction by 2034.

Phillips 66 suggests that the "Clear Gasoline" CI value of 100.46 gCO₂e/MJ (pathway code WAGAS001) be used for the "any other feedstock" category rather than the "baseline CI value for ULSD", since renewable naphtha and renewable gasoline/renewable gasoline blendstock belong to the gasoline fuel category, not the diesel fuel category.

Thank you for your consideration.

Sincerely,

Marc Ventura

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