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California LCFS – B0440 & B0441 Fuel Pathway Applications
Response to Comments
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March 19, 2024

Mr. Anil Baral
California Air Resources Board (CARB)
Low Carbon Fuel Standard (LCFS)
1001 I Street
Sacramento, California

Submitted Electronically

RE: Response to Comments on LCFS Fuel Pathway Applications B0440 & B0441

Phillips 66 Company (Phillips 66) appreciates the opportunity to provide a response to public comments on LCFS fuel pathway applications B0440 and B0441 for renewable diesel and renewable gasoline produced from used cooking oil (UCO).

Phillips 66 followed each and every regulatory requirement of the LCFS regulation in procuring feedstocks, processing them into renewable fuels, and selling the renewable fuels.

Additionally, Phillips 66 complies with the U.S. EPA's feedstock sourcing and tracking regulations adopted as part of the Agency's Renewable Fuels Standards (RFS2) program. Under these rules, the Company is required to maintain records demonstrating the amounts, by weight of the UCO collected. The UCO is considered a biogenic waste oil/fat/grease in the EPA program. Additionally, we are required to maintain documents demonstrating the location of any establishment(s) from which the waste stream consisting solely of UCO is collected. In adopting these requirements, the U.S. EPA is addressing the possibility of fraudulent UCO feedstocks. Finally, in the future, Phillips 66 will participate in the EPA's RFS Quality Assurance Program (QAP), which requires third party verification of feedstock recordkeeping documents. We believe and concur with the U.S. EPA that compliance with EPA's requirements will limit the possibility of fraudulently sourced UCO being processed at the Phillips 66 facility.

Concerning carbon intensity factors, Phillips 66 used the CA-GREET 3.0 model as the life cycle assessment (LCA) model which factors in the emissions due to transportation of the feedstocks, in addition the emissions from the processing operations and the fuel distribution. The carbon intensity (CI) scores reflect the burden of these emissions.

Furthermore, the fuel pathway applications have been validated by an independent third-party verification body who determined a positive verification statement. The verification included a focus on the feedstock sourcing, auditing many documents, including bill of lading, receipts and certificates of origin.

In addition to the initial fuel pathway validation, the fuel pathways will be verified by a third-party verifier on an annual basis, as required by the LCFS regulation.



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In conclusion, Phillips 66 is complying with both state and federal requirements for feedstock sourcing and carbon intensity estimations. Independent verifiers have also verified Phillips 66's feedstock sources. For these reasons, CARB should certify fuel pathway B0440 and B0441 as it has proposed.

Sincerely,

Marc Ventura