

Phillips 66

Thank you. Appreciate it. My name is Steven Smith and I'm with Phillips 66 company. We're a large fuel supplier of liquid products in the state of Washington and market primarily under the 76 brand in the state. We'd like to thank the Department of Ecology for this rulemaking and appreciated being proactive and in advance of the important cap-and-invest rulemaking that's to follow, so we appreciate that linear process. We'd like to thank the Department of Ecology for the change in the point of obligation for fuel supplier reporting from reporting at the refinery gate to reporting largely at the rack. That's consistent with California as was mentioned, so we think that's a positive change and support that change. I'd like to make three more specific comments. First, we note in the early draft cap-and-invest rulemaking that Ecology is contemplating that there could, in the future, be carbon capture and storage, geologic storage of CO₂, and other carbon removal technologies. That's contemplated in the cap-and-invest rulemaking. We think it may be necessary to include some of those facets in this reporting rulemaking so that the mechanism is in place to allow mathematical calculation and reporting of CO₂ captured via either carbon capture and storage or directcapture. Secondly, and just briefly repeating some points I made in Q&A and these points will be made in written comments, we do think that some broader language and definitions around biofuels-- Actually, definitions are probably adequate, but broader listings of different biofuels such as renewable diesel, renewable gasoline, and renewable propane in the rulemaking and rulemaking forms would be appropriate. Lastly, we do also encourage greater clarity in the rulemaking around the reporting dates or what information is required, starting in March of 2022 versus March of 2023 versus March of 2024. In other words, more granularity on the reporting of specific information by reporting year. Thank you very much for this opportunity to offer our comments.