



November 12, 2021

Department of Ecology
State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

Submitted electronically

RE: Washington Clean Fuel Standard Comments

Dear Debebe Dererie:

Renewable Energy Group, Inc. (“REG”) appreciates the opportunity to comment on the scope of the Washington Department of Ecology’s (“Ecology”) Clean Fuel Standard (“CFS”) rulemaking. REG has been a longtime supporter of the Washington CFS, and we are eager to begin continue the process of reducing fossil carbon emissions in Washington and engage in this important opportunity.

REG is leading the energy and transportation industries’ transition to sustainability by transforming renewable resources into high-quality, sustainable fuels. REG utilizes a nationwide production, distribution and logistics system for our 12 commercial-scale biodiesel and renewable diesel refineries (10 in North America and 2 in Europe). REG’s Grays Harbor facility, located in Hoquiam, Washington, is the largest biodiesel plant on the West Coast and is uniquely situated to serve the emerging Washington CFS market. Our biofuel production process converts waste fats and oils and vegetable oils into high quality renewable fuels to meet the growing global demand for cleaner, lower carbon products. The use of biodiesel and renewable diesel in a conventional diesel engine reduces life-cycle carbon emissions up to 85% when compared to emissions generated from conventional diesel fuel and lowers harmful emissions of carbon monoxide, sulfur, and particulate matter.

REG respectfully submits our request that the following topics be addressed during this rulemaking period:

- We suggest focusing the rulemaking on developing the program and establishing the WA-GREET Model. Addressing alternative or novel credit generation pathways in a subsequent rulemaking will keep this rulemaking session as simple and focused as possible.
- With Washington being the fourth North American jurisdiction to implement a transportation carbon market, and the interconnectedness of west coast fuel markets, we believe market participants are capable of beginning compliance in 2023. Therefore, we recommend initiating the 0.5% carbon reduction in the 2023 compliance year to most closely follow the law and to be proactive in reducing carbon as quickly as possible.



- Focus the WA-GREET Model to account for updated science related to indirect land use change for canola production, similar to British Columbia’s carbon intensity score for Canola Methyl Esters and Canola renewable diesel.
- Ensure the WA-GREET Model will address updated electricity production emissions which correspond to a recent edition of the eGRID model to accurately reflect fuel production energy carbon intensity.
- Establish a mechanism in WA-GREET to reduce the carbon intensity of fuels for feedstock utilizing carbon reducing agricultural practices such as no-till.
- Provide a mechanism for indirect accounting of electricity, hydrogen, and renewable natural gas used at renewable fuel production facilities to allow them to pursue low carbon inputs that will reduce their carbon intensity without having a direct connection.
- British Columbia is looking to expand regulated end uses so that low CI fuels that displace gasoline or diesel outside of traditional transportation end uses would be able to generate credits. REG suggests Washington consider something similar.

Thank you for the opportunity to present our initial comments. We look forward to continuing to be a partner in Washington’s decarbonization efforts.

Respectfully,

A handwritten signature in black ink, appearing to read "KH", is written over a light blue horizontal line.

Kent Hartwig, Director, Corporate Affairs and Development
Renewable Energy Group