

Phillips 66 Company

This comment is in response to the CI lookup tables emailed on April 26, 2022, by Rachel Assink.

Ecology should correct the following the CI lookup values in tables 4 and 8:

- WSGAS002, Washington gasoline blended with corn ethanol: The CI value should be established with 10% volume denatured ethanol, rather than the proposed 11.6% volume denatured, as the vast majority of gasoline supplied in Washington is blended with 10% ethanol.
- WAULSD002, Washington diesel blended with soy biodiesel: The CI value should be established on typical biodiesel blends supplied in the state, rather than the arbitrary proposed 2.5% biodiesel blend. Ecology could established instead a CI value for "B5" (5% biodiesel) for WAULSD002 and create another pathway, for example WAULSD003, with a CI value for "B20" (20% biodiesel).
- WAULSD0116, substitute CI for B5 diesel: The CI value is actually calculated for 2.5% biodiesel blend, not 5% biodiesel blend. Ecology should update the definition of WAULSD0116 and establish the CI value based on the average percentage of biodiesel in diesel fuel sold in Washington State.