Marc Ventura
Sr Specialist, Fuels Issues

PROVIDING ENERGY. IMPROVING LIVES.

RODEO RENEWABLE ENERGY COMPLEX
1380 San Pablo Avenue
Rodeo, CA 94572
marc.v.ventura@p66.com
510-245-4405

July 31, 2026

To Washington State Department of Ecology – CFS Staff

Submitted electronically

Comments on the 2026 CFS Rulemaking

Annual Participation Fee

Phillips 66 Company (Phillips 66) appreciates the opportunity to comment on the July 15, 2026, Washington Clean Fuel Standard (CFS) rulemaking workshop.

Phillips 66 is a producer of conventional fuels and renewable fuels and operates a fuels refinery and product terminals in Washington State. Phillips 66 markets fuels under the 76® brand on the U.S. West Coast.

During the workshop, Ecology proposed to update the annual participation fees that cover Ecology staff and computer system costs for the CFS. While Ecology's intent is to establish a more equitable program cost allocation between regulated entities, Ecology's proposal would continue to assign a much higher burden to deficit generation than to credit generation. The proposal includes a cost of 95 cents per CFS deficit compared to 5 cents per CFS credit. However, from a program administration standpoint, deficits are much simpler to administer than credits, as deficits are based on simple CI lookup values and do not need extensive Ecology staff review, unlike low carbon fuels which are demanding on Ecology's staff and computer systems, as they require fuel pathways review, maintain the Alternative Fuel Portal, and specific reviews for special fuels. Ecology should flip the cost structure and assign the majority of the cost to CFS credit generation, such as 95 cents per CFS credit and 5 cents per CFS deficit. At the very least, the cost structure per deficit should not be higher than the cost per credit.

Please reach out to discuss this concept further.

Thank you for your consideration,

Marc Ventura

Sr Specialist, Fuels Issues
Fuels Regulatory Affairs
Phillips 66 Company