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To Washington State Department of Ecology – CFS Staff

Submitted electronically

Comments on the 2026 Clean Fuels Standard (CFS) Rulemaking

WA GREET 4.0 Model Updates and Transition

Phillips 66 Company (Phillips 66) appreciates the opportunity to comment on the WA GREET 4.0 Model Updates and Transition workshop that took place on October 14, 2026.

Phillips 66 is a producer of conventional 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.

GREET 4.0 Implementation

For evaluating compliance with the certified CI scores, Ecology should continue to use the GREET 3.0 model until the new certified CI scores under GREET 4.0 are published by Ecology and are in effect. Based on the proposed schedule shown on slide 26, the GREET 4.0 will be in use not until the 2029 annual fuel pathway report (AFPR).

Once the GREET 4.0 is in effect, for renewable fuels facilities located in California, Washington State Department of Ecology (Ecology) should accept fuel pathway applications and AFPR submitted with the CA-GREET 4.0 model and Tier 1 Calculators, adjusted for product transportation to Washington State. This will avoid transcription errors and guarantee a more robust verification process.

ILUC Values

Ecology should take the opportunity of updating the life cycle assessment model (GREET) to revisit indirect land use change (ILUC) values that are published in table 5 of WAC 173-424-900. These values were adopted in 2015 by the California Air Resources Board, and significant new research has been completed in the last decade that provides more precision around ILUC CI estimates. Ecology should

update table 5 with more current ILUC values. Furthermore, Ecology should also include in table 5 ILUC values for cover crops, such as camelina and pennycress, which are currently missing from this table.

Thank you for your consideration,

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