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November 4, 2026

Clean Fuel Standard Department
Washington Department of Ecology

Re: October 14, 2026, Clean Fuel Standard Workshop – GREET 4.0

Submitted via electronic docket

Clean Fuels Standard Team,

RPMG Inc. (RPMG) appreciates the opportunity to comment on the Clean Fuel Standard regulatory update currently underway[1]. Transitioning to an updated carbon intensity model, and the subsequent 4.0 pathway adjustments, is a critical and needed set of steps to keep Washington's clean fuel program in alignment with other West Coast jurisdictions. RPMG supports this transition and offers the following comments with the intent of assisting Ecology in achieving a smooth process for both stakeholders and the agency.

RPMG is a leading biofuel marketing company representing our diverse owner and marketing partner facilities throughout the Midwest. We provide bioethanol and distillers corn oil (DCO) as essential inputs to Washington's low-carbon transportation fuel market. Our facilities are continually investing in lower-carbon technologies to produce lower carbon intensity fuels in furtherance of the CFS Program's goals.

There were several programmatic changes discussed at the October 14th workshop, including proposed changes to crude CI and electricity fuel mix accounting. Our comments are solely focused on biofuel pathway calculators and the possible transition timing laid out by Staff.

RPMG supports Ecology updating the WA-GREET model from version 3.0 to 4.0 based on California's CA-GREET 4.0, in general, and we specifically agree that the Corn Ethanol Tier 1 Calculator should be updated. The actual updates to the T1 calculators were understandably not presented, but given these calculators are the basis for all program CI scoring, RPMG suggests they be released in beta-test form. This would empower stakeholders to test the calculators, assess for any errors and generally get to work with them prior to any formal proposal. Transparency and visibility of data is of upmost importance to ensure market integrity, both for compliance and for the underlying carbon intensity modeling.

Equally important to the models themselves is their rollout and transition timing. RPMG cannot overstate the time and resources that can be saved with a well-thought-out implementation schedule for transitioning from WA-GREET 3.0 to WA-GREET 4.0. Washington should take lessons learned from both Oregon's and California's transitions. RPMG believes Oregon's implementation approach is preferred. Some of the key points RPMG has taken away from participating in both updates include:

- Providing clear processes and timelines well in advance of a compliance deadline will save considerable time and reduce confusion.
- Compliance should always be based on a comparison of like-to-like models, e.g., don't use the 4.0 model to judge compliance with a 3.0 generated pathway CI.

[1] https://ecology.wa.gov/regulations-permits/laws-rules-rulemaking/rulemaking/wac-173-424-455-clean-fuels-program#CR101

- Any impacts on a CI score resulting from the calculator change from 3.0 to 4.0 that may increase the risk of triggering credit exceedance penalties should be identified and communicated, as the new calculators are used for reporting.
- The addition of Margin of Safety opportunities during this transition are appreciated while facilities gain additional understanding of the impacts of the 4.0 tool and further align to changes in calculations and underlying assumptions.

Slide 34 specifically asks for input as to whether the transition timing is sufficient for the Program given the introduction of Third-Party Verification in 2028. RPMG does not have a concern that updating the calculators can't be done concurrently with the addition of Third-Party Verification. However, the details on 3PV are still not yet released. We would prefer that Washington's verification be as similar as possible to that of Oregon and California. Any major deviation would be a surprise that could impact smooth implementation of *both* the calculator update and introduction of verification.

As the CFS Program matures, regulatory updates such as this one provide an opportunity to include additional crediting options being pursued by biofuel producers to lower Washington's fuel mix CI scores. These well-understood mechanisms include: Book-and-Claim accounting for process energy at a biorefinery through the use of renewable electricity or renewable gas, crediting for Climate Smart Ag practices, alternative data sources for electricity, and expansion of transportation methods for the receipt of renewable gas.

As ECY determines the transition to the new calculator, consideration of enzyme application assumptions should be given further deliberation if utilization of an enzyme normalization tool for unique producers' processes is no longer present, since impacts on fiber pathway CI scores can be inappropriately skewed. Biofuel producers are actively testing new enzyme applications at multiple sites across their processes.

RPMG requests that ECY provide additional and consistent communication for timelines of annual reporting and resulting activities. Business activities and decisions are made based upon reporting and pathway certification. Activities such as credit true up calculations, the procuring of credits, as well as the finalization of subsequent fuel pathways and the related assessments of Margins of Safety, all impact business resources. These activities benefit from the certainty of timing and consistency in the approach with stakeholders.

Conclusion

We look forward to continuing to work on this update specifically, and the larger CFS rulemaking update. If you have any questions, please contact Jon Costantino at jon@tradesmanadvisors.com.

Thank you,

/s/

Jon Costantino
On behalf of RPMG