

# The Road Towards Decarbonization; Regulation, Implementation and Monetization



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# About Kristine Klavers

**Monetizing Carbon Reduction  
Renewable Diesel**



**NORWAY**



**MSc Chemical Engineering**



**Patent: Methane Coupling Catalyst**



**MTBE Product Specialist  
ARCO Chemical** ◆

**Energy Markets**



**International Fuel Quality Center  
Fuel Magazine**

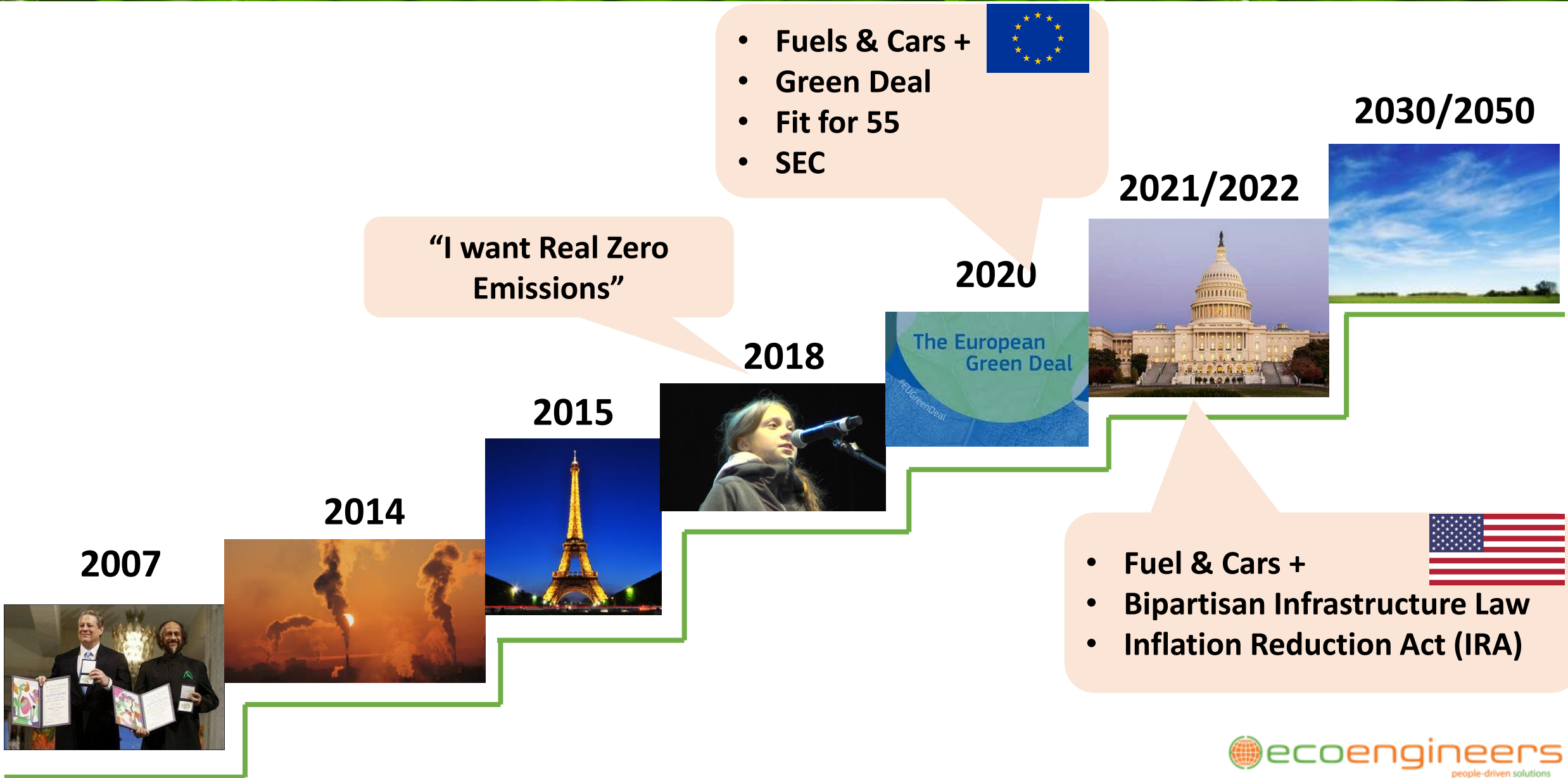


**Refinery Design/HAZOP**

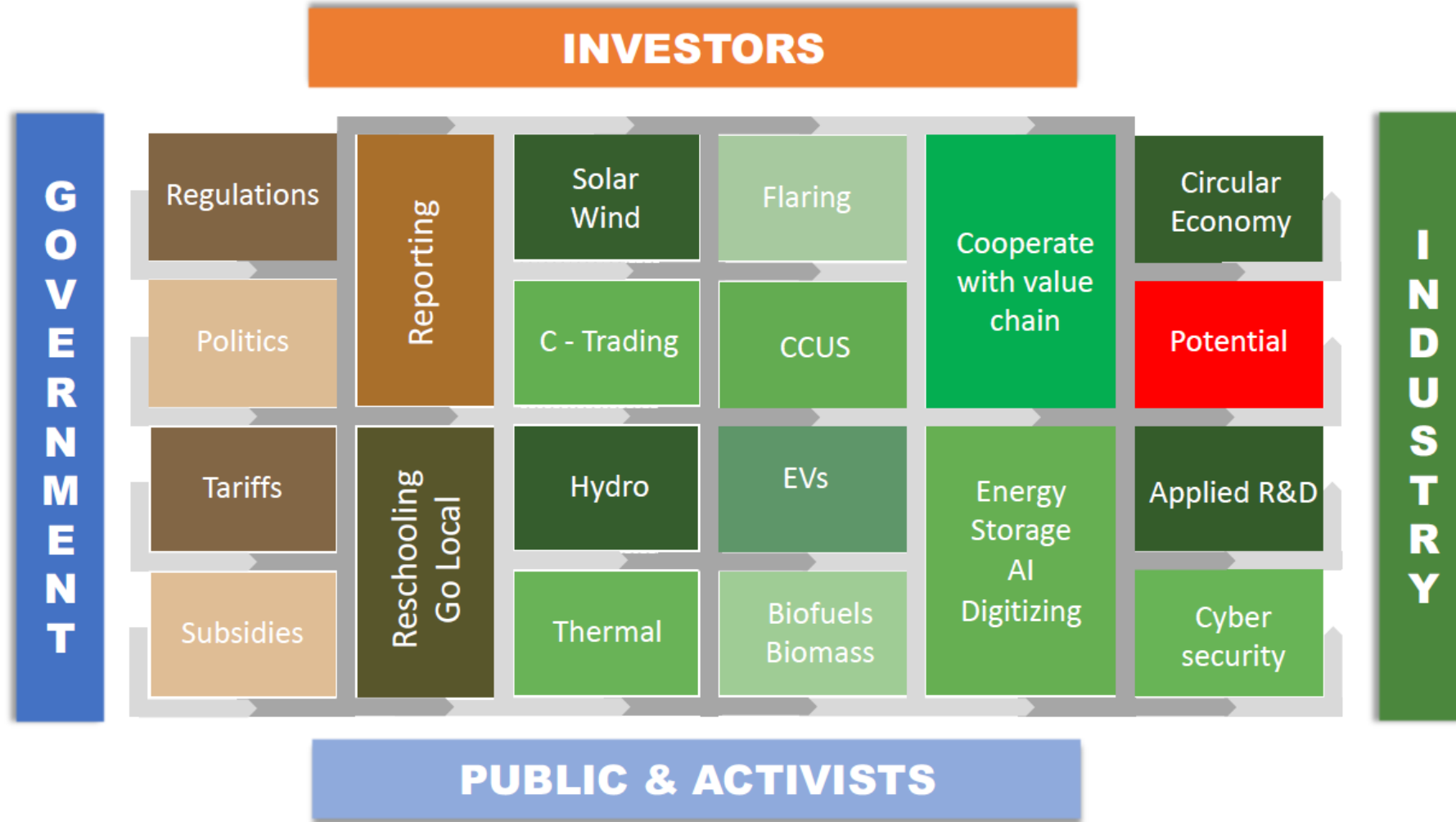


1. The race to “a zero-emission goal”
2. Carbon Intensity (CI) and Life Cycle Analysis (LCA)
3. Carbon markets
4. Monetization of Carbon Reduction in Downstream

# The road to zero carbon



# Many entities driving the industry



# Knowing your CI throughout the supply chain is KEY!

## Inflation Reduction Act (IRA)

- H<sub>2</sub> Production Tax Credit
  - \$0.60/kg + depending on lifecycle GHGs less than 0.4 kg of CO<sub>2</sub> per kg of H<sub>2</sub>
- Clean Electricity Investment Tax Credit
  - GHG to be 25% lower than 2022
- Clean Fuel Production Credit
  - Fuels with less than 50 kg CO<sub>2</sub>e/ mmBtu
- Sustainable Aviation Fuel Credit
  - Up to \$0.50/gallon depending on life-cycle GHG

# The entire supply chain is looking at decarbonizing opportunities

## ExxonMobil's GHG reduction plan

- Net 0 by 2050
- Corporatewide BY 2030
  - 20-30% reduction in CI
- Upstream by 2030
  - 40- 50% reduction in CI
- Methane BY 2030
  - 70-80% reduction in methane intensity
- Flaring
  - 60-70% reduction in flaring intensity



Amazon joins Climate pledge, net 0 carbon by 2040



FedEx \$2 billions, Climate pledge, net 0 carbon by 2040



2030 Commitments:

- Ocean: ~50% reduction in GHG **intensity**
- Terminals: ~70% absolute reduction of GHGs



By 2030 reduce its **net annual carbon emissions** by 5 MM tons versus its 2020 baseline (15% reduction).

OREGON

## Oregon issues \$2.7M fine to electric charging company

by: The Associated Press  
Posted: Oct 3, 2022 / 10:01 AM PDT

### BioDiesel Scandal: EPA Claims Auditor Genscape Allowed 68Mln Fraudulent RIN Credits – DTN

January 6, 2017  
By Todd Neeley DTN Staff Reporter

### SEC Charges Goldman Sachs Asset Management for Failing to Follow its Policies and Procedures Involving ESG Investments

FOR IMMEDIATE RELEASE  
2022-209

Washington D.C., Nov. 22, 2022 — The Securities and Exchange Commission today charged Goldman Sachs Asset Management, L.P. (GSAM) for policies and procedures failures involving two mutual funds and one separately managed account strategy marketed as Environmental, Social, and Governance (ESG) investments. To settle the charges, GSAM agreed to pay a \$4 million penalty.

## CER investigating potential \$1.5 million solar panel fraud

Australia's Clean Energy Regulator has this week executed search warrants on several residential and commercial addresses connected to a Perth-based solar PV retail and installation business as part of an investigation into a potential \$1.5 million solar panel fraud.

SEPTEMBER 16, 2022 DAVID CARROLL

## Shell Loses Dutch Appeal Over Misleading Carbon Emission Ads

- Dutch authority queries extent carbon credits offset emissions
- Oil major says no question of deception in advertisements

By [Diederik Baazil](#) and [Cagan Koc](#)

October 21, 2022 at 7:55 AM CDT *Updated on October 21, 2022 at*

• LIVE  
Watch

FOR IMMEDIATE RELEASE

Tuesday, October 20, 2020

### Pennsylvania Biofuel Company and Owners Sentenced on Environmental and Tax Crime Convictions Arising out of Renewable Fuels Fraud

## EPA Discovers More RIN Fraud

The U.S. Environmental Protection Agency said it has invalidated 33.5 million renewable-fuel credits sold by an Indiana company for biofuel it didn't produce, the fourth time the agency has alleged fraud in the program, Bloomberg News reported.





## Carbon Markets

The Minimize Risks by Knowing Your Emissions,  
Understanding Current & Future Regulations &  
related Compliance Requirements

## Regulated by region or state

- Mandated
- Cap-and-Trade regulations
- Credits
  - US Renewable Fuel Standard (RFS)
  - California Low Carbon Fuel Standard (LCFS)

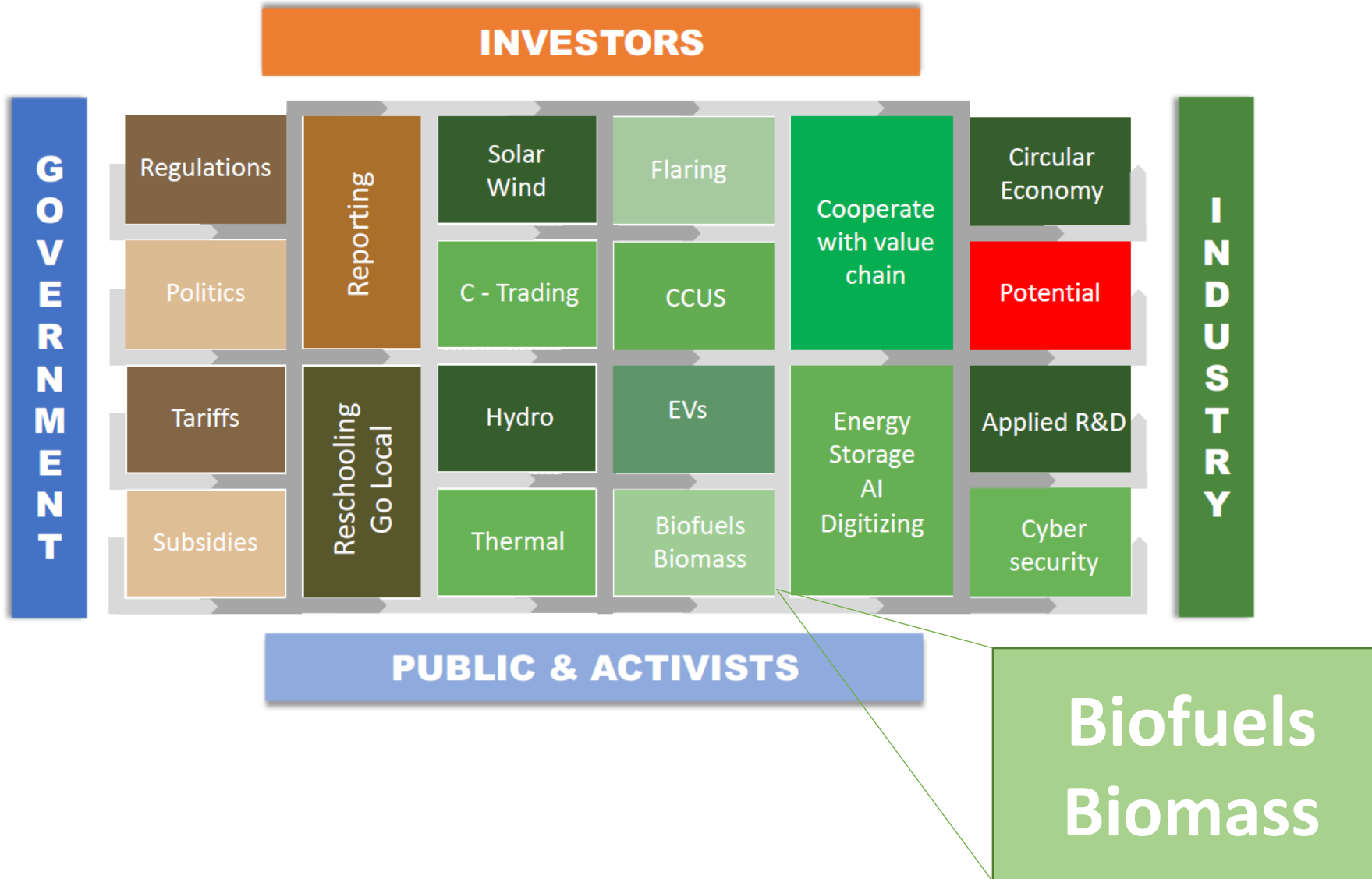
**Government managed**

## Voluntary between businesses

- Optional
- Offsets available for purchase
  - Reforestation
  - Renewable energy
  - Methane capture/combustion

**Registry managed**

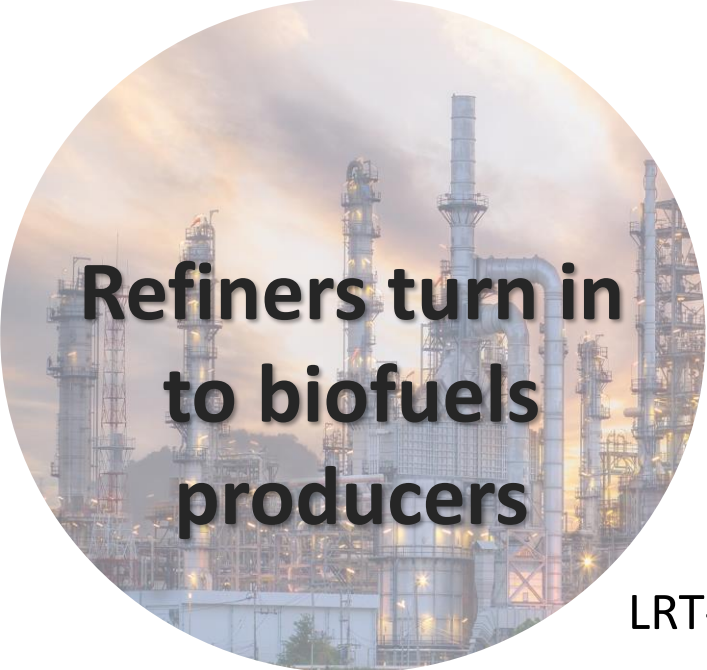
# Politics & regulations driving the industry



# Refiners turning into carbon reducers

## Federal RFS Renewable Fuels Standard Volume Driven

## State LCFS Low Carbon Fuels Standard Carbon Driven



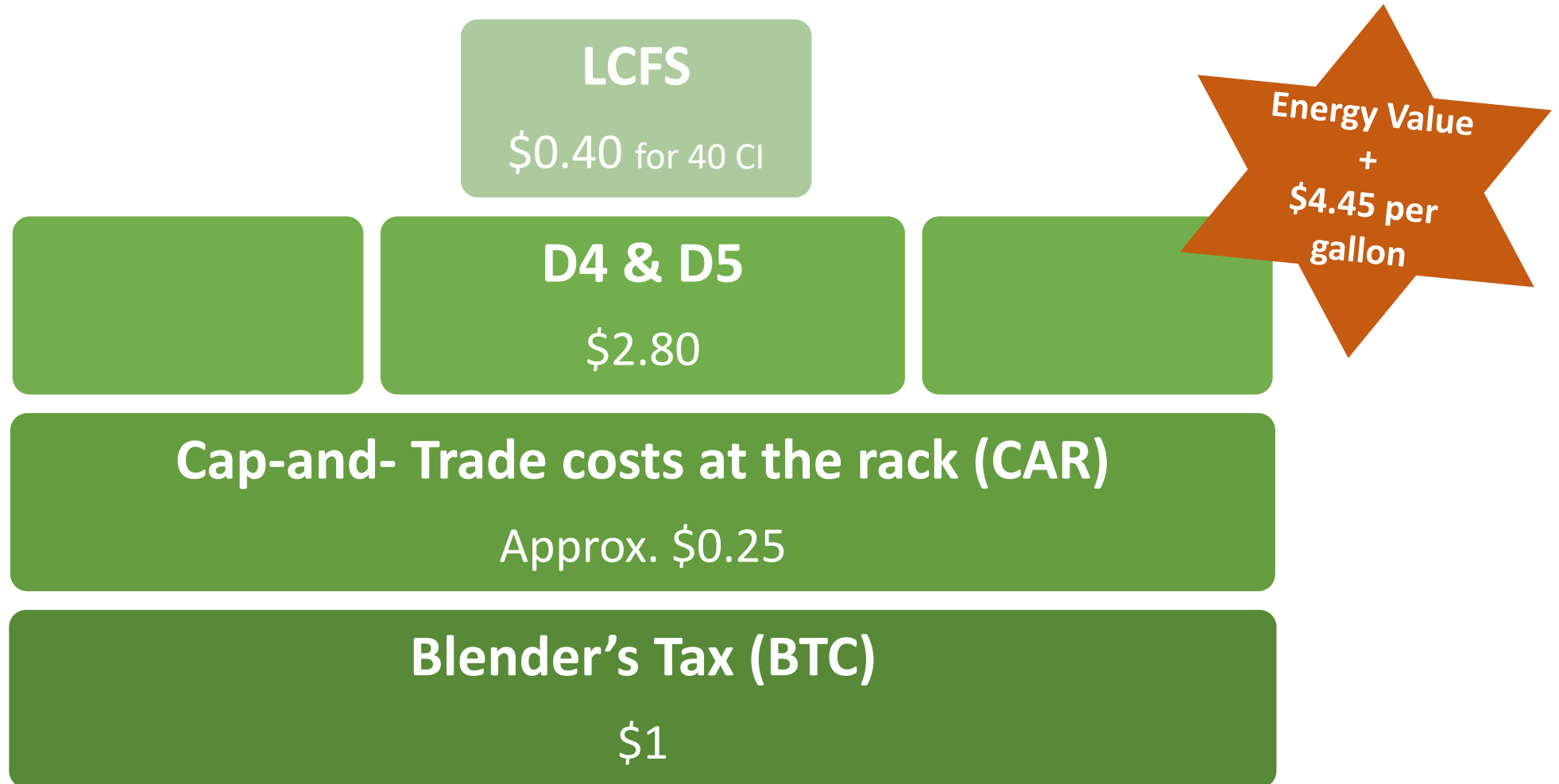
Quarterly Reporting  
 Biointermediate UCO  
 SREs RIN Generation Protocol  
 Retirement Q-RIN CDX  
 COI Cellulosic  
 EMTS QAP 79 Registration  
 Third Party Engineering Review  
 USEPA 40CFR Part 80  
 Import/Export documentation  
 D3, D4, D5, D6, D7

Compliance Recordkeeping/Monitoring Plan

Annual Reporting

CI RCO Validation  
 Life Cycle Analysis  
 AFP CA-GREET 3.0 Model  
 Verification  
 Temporary Pathway Deadlines  
 LRT-CBTS Fuel Pathway Code  
 Tier 1 and Tier 2 Pathways

# Monetize Your Renewable Diesel



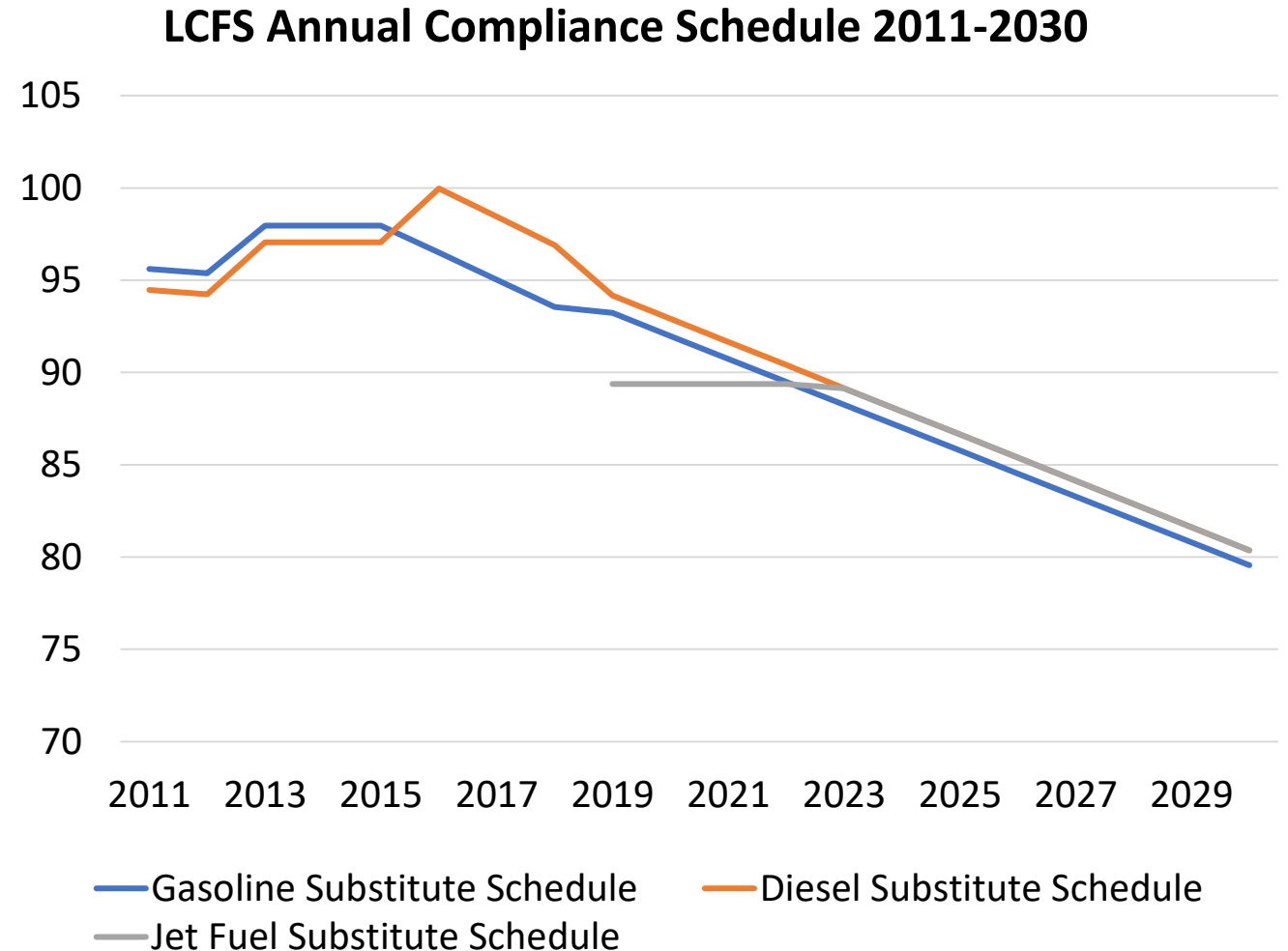
\* Prices are per gallon

# US Renewable Fuel Standard

## Title 40, Chapter I, Subchapter C, Part 80

D-RINs	Fuel	GHG reductions *compared to 2005 baseline	RVO target billion gallons *2022	Pathways examples Product-Feedstock-Process	RIN price per RIN
D6	<ul style="list-style-type: none"> <li>▪ Corn ethanol</li> <li>▪ Grandfathered</li> </ul>	<b>20%</b>	15	Ethanol-corn starch-dry mill	\$0.80-1.80
D4	<ul style="list-style-type: none"> <li>▪ Sugarcane ethanol</li> </ul>	<b>50%</b>	5	Renewable diesel-soybean-hydrotreating	\$1.20-2.00
D5	<ul style="list-style-type: none"> <li>▪ Renewable diesel</li> <li>▪ Biodiesel</li> </ul>			Naphtha-camelina-transesterification	
D3	<ul style="list-style-type: none"> <li>▪ Cellulosic fuels</li> </ul>	<b>60%</b>	0.63 No target is set yet	RNG-dairy-aerobic digestion	\$2.50-3.50
D7	<ul style="list-style-type: none"> <li>▪ RNG/LNG</li> </ul>				

- Reduce GHG Emissions by 20% by 2030
- Reduce petroleum dependency
- Incentivize the development of low carbon fuels based on CI score
  - Performance-based: Credit or Deficit
  - Fuel neutral: No fuel type-specific goals

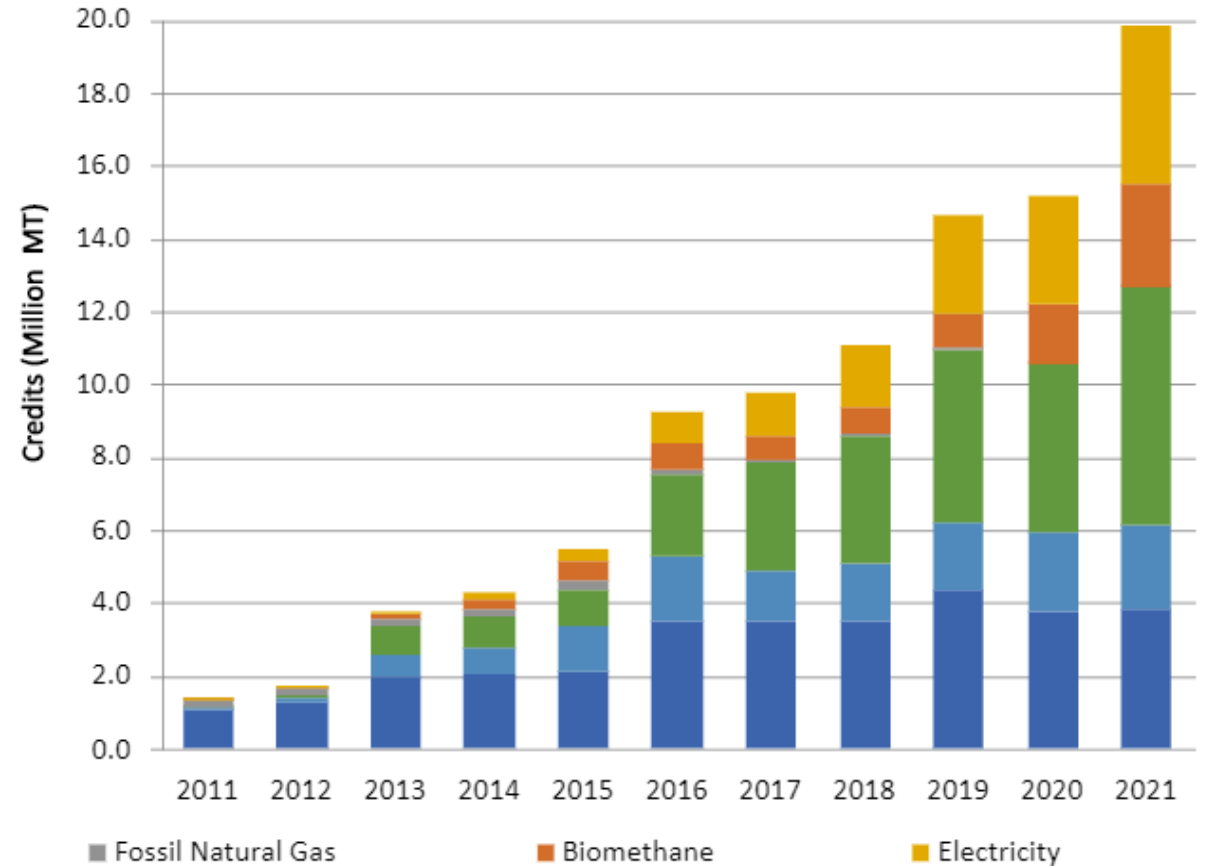
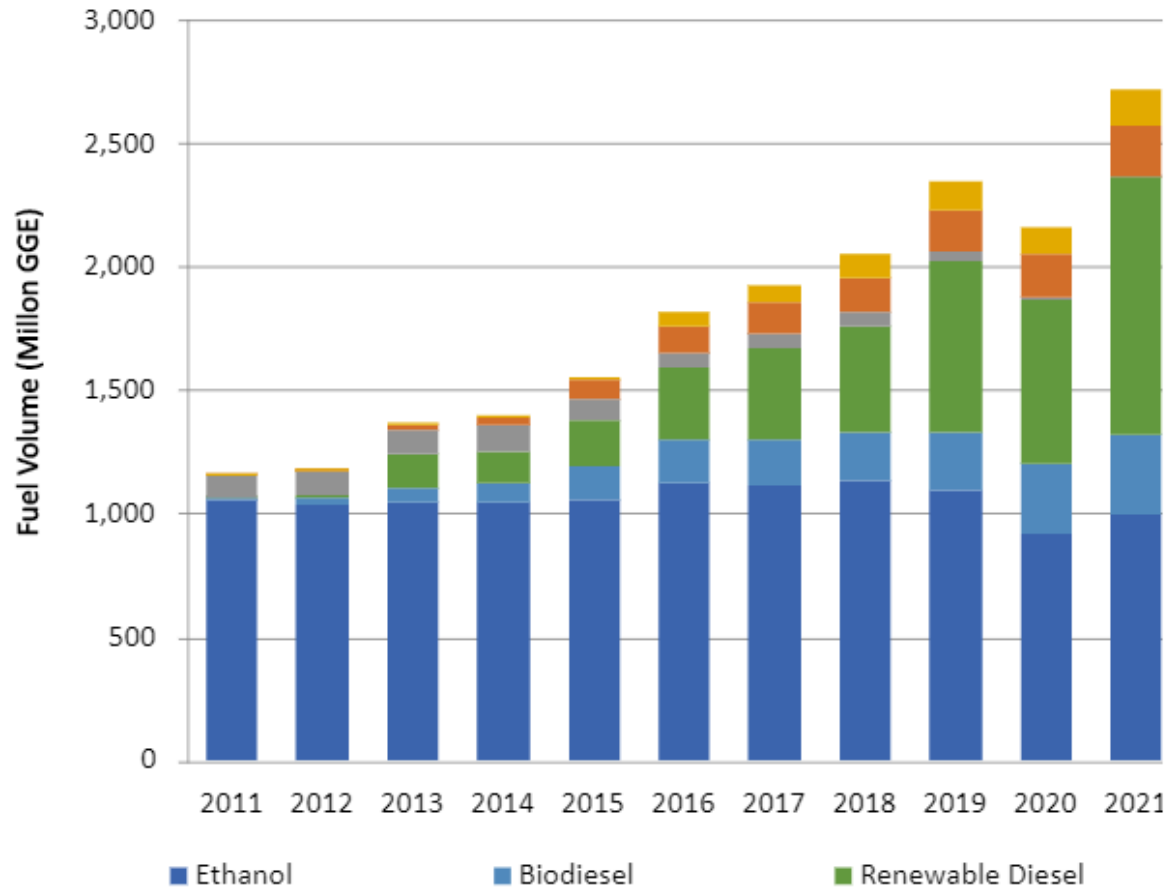


# Determine your CI score through LCA

Feedstock	CI g/CO2e/MJ	
Gasoline	100.82	
Diesel	100.45	
Fossil NG	79.21	
Used Cooking Oil Biodiesel	8.63	30.15
Oil (soy, corn) Biodiesel	29.42	61.94
Ethanol	7.18	80.85
CNG (dairy manure, landfill gas...)	-408.6	52.64
Hydrogen	-35	170
Electricity	-762.09	108.43



# Advanced Renewables Increase Volume, Decrease CI

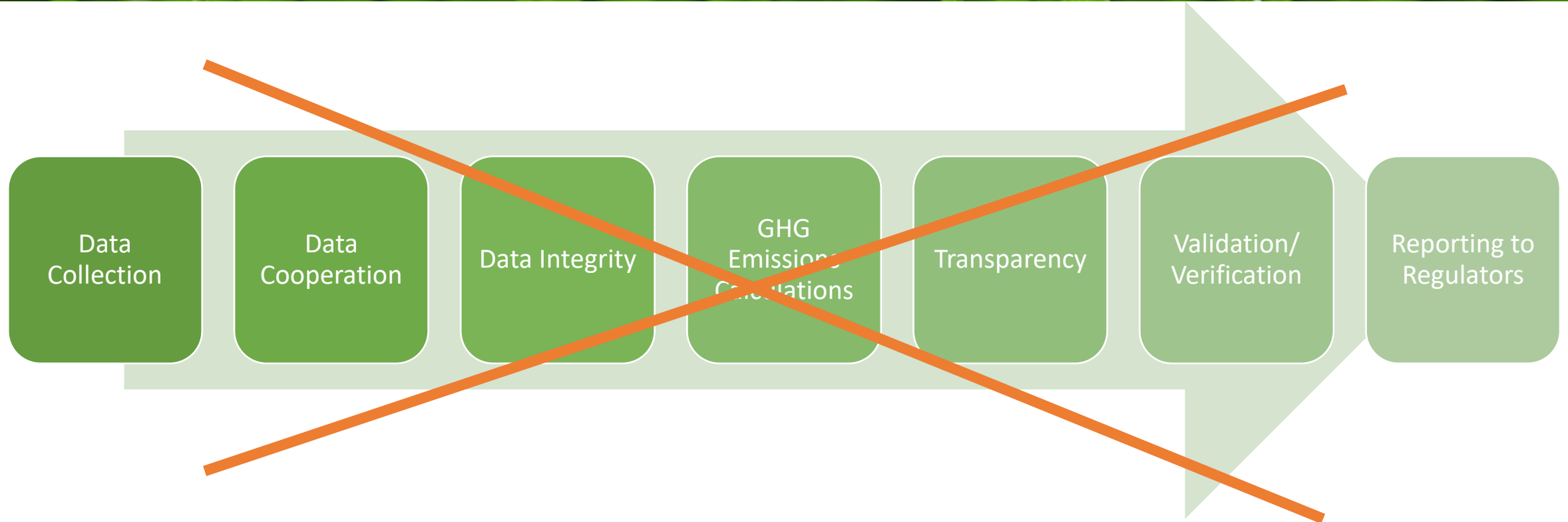


Source: CARB

# Know the Compliance Requirements

MONTH	UCO CARRY-OVER (KG)	UCO INCOMING (KG)	12MO UCO PURCHASES (KG)	CUMULATIVE UCO PURCHASES (KG)	UCO INPUT - REPORTED (KG)	UCO INPUT - CALCULATED (KG)	12MO UCO INPUT (KG)	CUMULATIVE UCO INPUT (KG)	UCO LOSS (KG)	UCO SALE + OTHER USE (KG)	UCO MONTH-END STOCK (KG)	SICO CARRY-OVER (KG)	SICO INCOMING (KG)	SICO INPUT (KG)	SICO LOSS (KG)	SICO MONTH-END STOCK (KG)	UCO + SICO INCOMING (KG)	POOL CARRY-OVER (KG)	POOL INCOMING (KG)	POOL INPUT (KG)	POOL MONTH-END STOCK (KG)	TOTAL FEEDSTOCK INCOMING (KG)	12MO FEEDSTOCK INCOMING (KG)	CUMULATIVE FEEDSTOCK INCOMING (KG)	TOTAL FEEDSTOCK INPUT (KG)	12MO FEEDSTOCK INPUT (KG)	CUMULATIVE FEEDSTOCK INPUT (KG)	TOTAL FEEDSTOCK LOSS / SALE (KG)	MONTH CARRY-OVER (KG)	MONTH INCOMING (KG)	12MO				
2020	JAN	358,450	598,310	598,310	598,310	956,760	956,760	956,760	956,760		0	0	0	0	0	711,660	6,051,920	0	58,010	58,010	0	358,450	6,109,930	6,109,930	5,756,720	5,756,720	5,756,720	0	711,660	44,880	577,690	577,690			
2020	FEB	0	445,570	445,570	1,043,880	445,570	445,570	1,492,350	1,492,350	0	0	0	0	0	0	711,660	1,200,800	1,912,460	0	1,646,370	0	3,973,020	3,471,650	501,370	711,660	5,619,390	5,619,390	11,586,400	0	501,370	46,500	609,670	609,670		
2020	MAR	0	56,810	56,810	1,100,690	56,810	56,810	1,559,140	1,559,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	5,806,990	5,806,990	11,586,400	11,586,400	11,586,400	0	417,300	37,480	628,610	628,610			
2020	APR	0	0	0	1,100,690	0	0	1,459,140	1,459,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	6,374,440	6,374,440	12,003,700	12,003,700	12,003,700	0	417,300	20,690	727,050	727,050			
2020	MAY	0	0	0	1,100,690	0	0	1,459,140	1,459,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	7,487,440	7,487,440	13,421,140	13,421,140	13,421,140	0	417,300	33,700	850,620	850,620			
2020	JUN	0	0	0	1,100,690	0	0	1,459,140	1,459,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	8,644,050	8,644,050	14,838,480	14,838,480	14,838,480	0	417,300	40,120	990,660	990,660			
2020	JUL	0	0	0	1,100,690	0	0	1,459,140	1,459,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	9,851,350	9,851,350	16,299,830	16,299,830	16,299,830	0	417,300	55,480	1,146,140	1,146,140			
2020	AUG	0	0	0	1,100,690	0	0	1,459,140	1,459,140	0	0	0	0	0	0	0	0	0	0	0	0	417,300	11,109,050	11,109,050	17,718,980	17,718,980	17,718,980	0	417,300	72,660	1,318,800	1,318,800			
2020	SEP	0	1,782,390	1,782,390	2,883,080	1,157,950	1,157,950	1,157,950	2,617,090	0	624,440	171,240	1,244,800	1,399,740	16,300	0	0	0	0	0	0	171,240	13,411,490	13,411,490	19,130,470	19,130,470	19,130,470	16,300	624,440	18,850	1,606,000	1,606,000			
2020	OCT	624,440	5,133,890	5,133,890	8,016,970	5,197,170	5,197,170	5,197,170	7,814,260	0	561,160	0	963,810	963,810	0	0	0	0	0	0	0	624,440	14,035,910	14,035,910	20,756,410	20,756,410	20,756,410	0	561,160	50,690	680,420	680,420			
2020	NOV	561,160	4,884,310	4,884,310	9,998,280	4,920,610	4,920,610	4,920,610	10,111,740	0	504,800	0	0	0	0	0	0	0	0	0	0	561,160	14,597,070	14,597,070	21,253,480	21,253,480	21,253,480	0	504,800	32,190	812,610	812,610			
2020	DEC	504,800	6,154,520	6,154,520	19,035,800	6,111,710	6,111,710	6,111,710	18,846,640	0	547,610	0	0	0	0	0	0	0	0	0	0	504,800	15,101,870	15,101,870	22,755,350	22,755,350	22,755,350	0	547,610	30,020	942,630	942,630			
2021	JAN	547,610	6,028,460	6,028,460	25,064,260	6,287,080	6,287,080	6,287,080	25,133,720	0	288,990	0	0	0	0	0	0	0	0	0	0	547,610	15,649,480	15,649,480	23,284,900	23,284,900	23,284,900	0	288,990	31,690	1,074,320	1,074,320			
2021	FEB	288,990	4,559,410	10,587,870	29,623,670	4,610,130	4,610,130	10,897,210	29,743,850	0	238,270	0	0	0	0	0	0	0	0	0	0	288,990	16,188,470	16,188,470	23,823,170	23,823,170	23,823,170	0	238,270	38,410	1,112,730	1,112,730			
2021	MAR	238,270	6,653,070	17,240,940	36,276,740	4,608,730	4,608,730	17,305,940	36,152,580	0	482,610	0	0	0	0	0	0	0	0	0	0	238,270	16,670,740	16,670,740	24,061,880	24,061,880	24,061,880	0	482,610	40,640	1,153,370	1,153,370			
2021	APR	482,610	6,169,390	23,410,330	42,446,130	6,241,900	6,241,900	23,547,840	42,394,480	0	410,100	0	0	0	0	0	0	0	0	0	0	482,610	17,080,350	17,080,350	24,472,030	24,472,030	24,472,030	0	410,100	34,110	1,187,480	1,187,480			
2021	MAY	410,100	5,805,630	29,215,960	48,251,760	5,895,510	5,895,510	29,443,350	48,289,990	0	320,220	0	0	0	0	0	0	0	0	0	0	410,100	17,495,980	17,495,980	24,892,230	24,892,230	24,892,230	0	320,220	34,650	1,222,130	1,222,130			
2021	JUN	320,220	5,044,710	34,260,670	53,296,470	4,916,950	4,916,950	34,360,300	53,206,940	0	447,980	0	0	0	0	0	0	0	0	0	0	320,220	17,943,900	17,943,900	25,139,130	25,139,130	25,139,130	0	447,980	59,540	1,281,670	1,281,670			
2021	JUL	447,980	7,339,960	41,600,630	60,636,430	7,551,620	7,551,620	41,911,920	60,758,560	0	236,320	0	0	0	0	0	0	0	0	0	0	447,980	18,385,880	18,385,880	25,375,350	25,375,350	25,375,350	0	236,320	36,800	1,318,470	1,318,470			
2021	AUG	236,320	6,792,140	48,392,770	67,428,570	6,248,340	6,248,340	48,160,260	67,006,900	0	780,120	0	0	0	0	0	0	0	0	0	0	236,320	18,866,020	18,866,020	25,611,650	25,611,650	25,611,650	0	780,120	51,680	1,370,150	1,370,150			
2021	SEP	780,120	5,984,670	54,377,440	73,413,240	6,128,050	6,128,050	54,288,310	73,134,950	0	636,740	0	0	0	0	0	0	0	0	0	0	780,120	19,502,700	19,502,700	25,848,350	25,848,350	25,848,350	0	636,740	54,200	1,424,350	1,424,350			
2021	OCT	636,740	5,924,710	60,302,150	79,337,950	6,145,680	6,145,680	60,433,990	79,280,630	0	415,770	0	0	0	0	0	0	0	0	0	0	636,740	20,118,400	20,118,400	26,064,050	26,064,050	26,064,050	0	415,770	35,210	1,459,560	1,459,560			
2021	NOV	415,770	5,792,160	66,094,310	85,130,110	5,999,240	5,999,240	66,433,230	85,279,870	0	208,690	0	1,163,870	503,290	0	0	0	0	0	0	0	415,770	20,534,170	20,534,170	26,266,700	26,266,700	26,266,700	0	208,690	31,880	1,491,440	1,491,440			
2021	DEC	208,690	7,604,660	73,016,310	91,159,110	0	0	73,016,310	91,159,110	0	660,580	0	6,511,320	6,612,680	-208,690	0	0	0	0	0	0	208,690	21,194,750	21,194,750	26,532,000	26,532,000	26,532,000	0	660,580	67,560	1,558,990	1,558,990			

# Non-Compliance leads to project and financial risks



Regulated Market	Voluntary Market
Invalid RINs or Credits	Reduced price
Financial penalties	

We Can ONLY Improve What We Measure!



**Know your CI score!**

Thank you!

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### **EcoEngineers is here to help!**

Our experienced engineers, scientists, auditors, researchers, and analysts help you navigate the carbon market and monetize your carbon reduction, by knowing:

- the low-carbon fuel policies
- the innovative technologies

We deliver expertise through the entire clean energy continuum, including education, regulatory engagement, life-cycle analysis, asset development, compliance management, audit, and verification.

# What is the Life-Cycle-Analysis (LCA)?

- Assess the environmental aspects and potential impacts associated with a product, process, or services.
- Consistent LCA methodologies help:
  - Compare technologies
  - Identify drivers for environmental improvements
- Minimum requirements for reliability:
  - The entire supply chain
  - Objectivity
  - Mass and energy balances
  - Co-product methods
  - Functional units



Source: Wiki Commons

# REET covers many groups of energy systems

<p><b>Petroleum Sector</b></p> <ul style="list-style-type: none"> <li>Conventional oil</li> <li>Shale oil</li> <li>Oil sands</li> </ul>	<ul style="list-style-type: none"> <li>Gasoline</li> <li>Diesel</li> <li>Jet fuel</li> <li>LPG</li> <li>Naphtha</li> <li>Residual Oil</li> </ul>	<p><b>Electric System</b></p> <ul style="list-style-type: none"> <li>Electricity generation at US plant level</li> <li>Aggregate to national, NERC and state level</li> <li>With CCS</li> </ul>	<ul style="list-style-type: none"> <li>Natural gas</li> <li>Coal</li> <li>Residual Oil</li> <li>Biomass</li> <li>Nuclear</li> <li>Hydro</li> <li>Wind</li> <li>Solar</li> </ul>
<p><b>NG Sector</b></p> <ul style="list-style-type: none"> <li>Conversational NG</li> <li>Shale gas</li> </ul>	<ul style="list-style-type: none"> <li>NG end use in electric, industrial and residential sectors</li> <li>Transportation: CNG, LNG</li> <li>Alt fuels: LPG, MeOH, DME, FT diesel, FT jet</li> </ul>	<p><b>Renewable Energy/Fuels</b></p> <ul style="list-style-type: none"> <li>Ethanol</li> <li>Biodiesel</li> <li>Renewable Diesel</li> <li>Renewable Gasoline</li> <li>Renewable jet fuel</li> <li>Renewable NG</li> </ul>	<p><b>1<sup>st</sup> generation feedstock</b></p> <ul style="list-style-type: none"> <li>Corn, Sorghum, Soybeans</li> <li>Rapeseed, Sugarcane</li> </ul> <p><b>2<sup>nd</sup> Generation feedstocks</b></p> <ul style="list-style-type: none"> <li>Crop and Forest residues</li> <li>MSW, Animal Wastes</li> </ul> <p><b>Algae</b></p>
<p><b>Hydrogen Economy</b></p> <ul style="list-style-type: none"> <li>Gaseous H2</li> <li>Liquid H2</li> <li>With CCS</li> </ul>	<ul style="list-style-type: none"> <li>Natural gas</li> <li>Biomass</li> <li>Coal</li> <li>Petroleum coke</li> <li>Coke Oven gas</li> <li>Electrolysis with electricity</li> <li>Nuclear energy</li> </ul>	<p><b>Renewable H2 via electrolysis</b></p> <ul style="list-style-type: none"> <li>Wind</li> <li>Solar</li> <li>Nuclear</li> </ul>	<p><b>Electro Fuels</b></p> <ul style="list-style-type: none"> <li>Gasoline</li> <li>Diesel</li> <li>Jet fuel</li> <li>Methanol</li> </ul>

Source: DOE