



### Disclaimer

This document describes how the 45ZCF-GREET model characterizes life cycle greenhouse gas (GHG) emissions of approved transportation fuel production pathways. Further, the manual provides guidance for using the model to determine emissions rates for clean fuels tax credits, as established in § 45Z (45Z tax credit) of the Internal Revenue Code. If the model is revised in the future, those releases may be accompanied with additional supporting documentation describing the revisions made. The model is specific to the calculation of GHG emissions for the 45Z tax credit. Therefore, its use would not be appropriate for other purposes, including determining eligibility for other tax credits or other federal programs.

### **List of Acronyms**

AR5	Fifth Assessment Report (IPCC)
ATJ	alcohol-to-jet
BTM	behind-the-meter
CCUS	carbon capture utilization and sequestration
CH <sub>4</sub>	methane
CI	carbon intensity
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
СММ	coal mine methane
DCO	distillers corn oil
D-LCA	direct life cycle assessment
EAC	energy attribute credit
GGE	gallon gasoline equivalent
GHG	greenhouse gas
GREET	Greenhouse gases, Regulated Emissions, and Energy use in Technologies
GWP	global warming potential
HEFA	hydroprocessed esters and fatty acids
ILUC	induced land use changes
IPCC	Intergovernmental Panel on Climate Change
IRS	Internal Revenue Service
LCA	life cycle analysis
LHV	lower heating value
LPG	liquefied petroleum gas

MMBtu	million British thermal units
N <sub>2</sub> O	nitrous oxide
R&D GREET	Research and Development Greenhouse gases, Regulated Emissions, and Energy use in Technologies
RNG	renewable natural gas
SAF	sustainable aviation fuel
UCO	used cooking oil

### **Executive Summary**

This document describes the methodology to calculate life cycle greenhouse gas (GHG) emissions of transportation fuel production using the 45ZCF-GREET model (May 2025 version) that has been developed by Argonne National Laboratory (ANL). The model is titled "45ZCF-GREET" because it was developed in support of the clean fuels (CF) tax credit authorized by § 45Z of the I.R.C. 45ZCF-GREET includes feedstock-specific fuel production pathways for sustainable aviation fuel (SAF) and non-SAF fuel. The SAF production pathways leverage those that were included in 40BSAF-GREET, which was developed in collaboration with the Interagency Sustainable Aviation Fuels Lifecycle Analysis Working Group, with consideration of information provided by EPA in the December 13, 2023, letter regarding § 211(o) of the Clean Air Act,<sup>1</sup> and in consultation with the UST, for use in implementing the 40B tax credit.

45ZCF-GREET is available at: <u>www.energy.gov/eere/GREET</u>. The 45ZCF-GREET model was developed as a specific version of the GREET model to determine emissions rates that also meets three key parameters: (1) user-friendliness and consistency, (2) technical robustness of the pathways represented, and (3) consistency with the requirements of section 45Z. The model includes transportation fuel production pathways that are of sufficient methodological certainty to be appropriate for determining eligibility for the 45Z tax credit.

The 45Z tax credit is available for certain fuels that are suitable for use in a highway vehicle or aircraft produced domestically after December 31, 2024, and sold prior to January 1, 2028. The 45Z tax credit is equal to the product of (A) the applicable amount per gallon (or gallon equivalent) of a transportation fuel produced at a qualifying facility and (B) the emissions factor for such fuel. The applicable amount (A) is \$1.00 for non-SAF and \$1.75 for SAF where applicable wage and apprenticeship requirements specified in § 45Z are met; \$0.20 for non-SAF and \$0.35 for SAF if wage and apprenticeship requirements are not met<sup>2</sup> per gallon or gallon gasoline equivalent (GGE), as appropriate, of a transportation fuel produced at a gualifying facility. The emissions factor (B) is calculated as the quotient of— (I) an amount equal to (aa) 50 kilograms (kg) of CO<sub>2</sub>-equivalents (CO<sub>2</sub>e) per million British Thermal Units (MMBtu), minus (bb) the emissions rate for such fuel, divided by (II) 50 kg of CO<sub>2</sub>e per MMBtu. For a claimant to gualify for the 45Z tax credit, the producer of the transportation fuel is required to be registered with the IRS. In the case of SAF, a claimant for the 45Z tax credit is also required to provide the IRS with certification from an unrelated party demonstrating compliance with any general requirements, supply

<sup>&</sup>lt;sup>1</sup> Letter from Joseph Goffman, Principal Deputy Assistant Administrator for the Office of Air and Radiation, U.S. Environmental Protection Agency, to Lily Batchelder, Assistant Secretary for Tax Policy, U.S. Department of Treasury (December 13, 2023), available at

home.treasury.gov/system/files/136/Final-EPA-letter-to-UST-on-SAF-signed.pdf.

<sup>&</sup>lt;sup>2</sup> These amounts are adjusted for inflation. Notice 2025-11states that the Treasury Department and the IRS intend to publish guidance on the inflation adjustment factor for the 2025 calendar year at a later time in the *Internal Revenue Bulletin*.

chain traceability requirements, and information related to transmission requirements for the methodology used to determine the GHG emissions rate of SAF.

Section 45Z generally divides transportation fuel into two categories: sustainable aviation fuel (SAF) transportation fuel and non-SAF transportation fuel, with different methods to determine emissions rates for SAF and non-SAF fuel. Section 45Z directs the Treasury Department to annually publish a table setting forth the emissions rates for similar types and categories of transportation fuels based on the amount of lifecycle GHG emissions as described in § 211(o)(1)(H) of the Clean Air Act (42 U.S.C. 7545(o)(1)(H))(CAA), as in effect on August 16, 2022, for such fuels, expressed as kg of CO<sub>2</sub>e per MMBtu. Treasury and the IRS have issued Notice 2025-11 containing the initial table setting forth these emissions rates for purposes of the § 45Z credit.

For certain types and categories of non-SAF transportation fuels, Notice 2025-11 directs taxpayers to determine the emissions rate of a fuel using the most recent version of the 45ZCF-GREET model.<sup>3</sup> For hydrogen, Notice 2025-11 directs taxpayers to calculate well-to-gate emissions using the most recent 45VH2-GREET model (the model used to determine emissions rates for the § 45V Clean Hydrogen Production Credit), then calculate the full well-to-wheels emissions using the most recent version of 45ZCF-GREET model.

For certain categories of SAF, Notice 2025-11 directs taxpayers to determine the emissions rate using either the most recent version of the 45ZCF-GREET model, or using determinations from fuel pathways approved under the most recent Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) Default Life Cycle Emissions Values for CORSIA Eligible Fuels (CORSIA Default) or CORSIA Methodology for Calculating Actual Life Cycle Emissions Values (CORSIA Actual). For other categories of SAF, taxpayers are directed to use the most recent CORSIA Default or CORSIA Default.

If a transportation fuel is (1) a novel type of fuel not included in the applicable emissions rate table, or (2) if the type of fuel is included in the emissions rate table, but such fuel is produced using a using a pathway/feedstock combination not included in the applicable emissions rate table, the taxpayer producing such fuel may file a petition with the Secretary of the Treasury for a provisional emissions rate (PER).

Notice 2025-11, sec. 4.01 also states that "[i]f a version of the 45ZCF-GREET model adds a type or category of fuel after the first day of a taxable year, taxpayers must use such version of the 45ZCF-GREET model for the new type or category of fuel for the entire taxable year. Additionally, if an updated version of the 45ZCF-GREET model becomes publicly available after the first day of the taxable year of production (but still

<sup>&</sup>lt;sup>3</sup> In Notice 2025-11, the Treasury Department and Internal Revenue Service determined that 45ZCF-GREET is the successor model to be used to calculate emissions rates for non-sustainable aviation fuel (SAF) transportation fuel. See also Notice 2025-10. With regard to SAF, Notice 2025-11 states Treasury and IRS's conclusion that 45ZCF-GREET constitutes a methodology that is similar to the most recent CORSIA and that also satisfies the criteria under § 211(o)(1)(H) of the Clean Air Act.

within such taxable year), then the taxpayer may, in its discretion, treat such updated version as the most recent version of the 45ZCF-GREET model."

Guidance concerning registration, certification, and claims for the 45Z tax credit is outside the scope of this document. Please refer to Notice 2024-49, Notice 2025-10 and Notice 2025-11, including guidance on rounding emissions factors and other methodologies used for the 45Z tax credit.

This document refers to the § 45V Regulations [TD 10023] and 45VH2-GREET January 2025 user manual. As indicated in the Notice of Intent to Propose Rules under § 45Z (Notice 2025-10), the Treasury Department and the IRS intend to propose that rules similar to the rules established under § 45V would apply under § 45Z with respect to determining emissions associated with hydrogen (as a production input), natural gas alternatives (as a production input or as the qualified transportation fuel produced), electricity, and carbon capture utilization and sequestration. For this reason, the manual provides guidance for how to use 45ZCF-GREET consistent with and through reference to the applicable rules established by the Treasury Department and IRS under § 45V.

This document has three sections:

- Section 1: Introduction
- Section 2: Methodology
- Section 3: User Instructions

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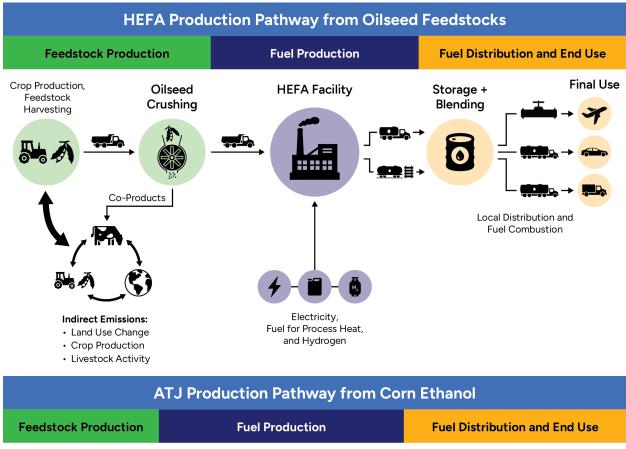
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# 1 Introduction

45ZCF-GREET (May 2025 version) can be used to characterize transportation fuel lifecycle greenhouse gas (GHG) emissions through the point of use. "Emissions through the point of use" is defined as the aggregate lifecycle GHG emissions related to transportation fuel produced at a transportation fuel production facility. It includes emissions associated with feedstock growth/sourcing, gathering, processing, and delivery to a transportation fuel production facility, as well as estimates of indirect effects (abbreviated in the model as I-Effects) from land use change (conversion of new land to agricultural production), livestock activity changes, and crop production changes (see **Figure 1**). It also includes the emissions associated with the transportation fuel production facility. Lifecycle GHG emissions accounted for in 45ZCF-GREET also include transport, storage, and use of the transportation fuel as part of a neat fuel or fuel blend suitable for transportation.



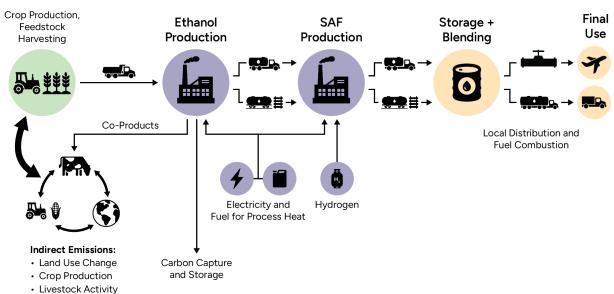


Figure 1. Examples of key activities related to life cycle GHG emissions within the system boundary for transportation fuel production

The top diagram shows an example hydroprocessed esters and fatty acids (HEFA) pathway and the bottom diagram shows an alcohol-to-jet-ethanol (ATJ-ethanol) pathway, which co-produces both SAF and diesel.

Certain parameters within 45ZCF-GREET are fixed (i.e., "background data") and may not be changed by the user. Background data is defined as parameters for which default average values based on industry statistics and scientific literature are deemed appropriate. Examples of background data in 45ZCF-GREET include direct emissions from operating farm equipment, methane leakage rates for the natural gas supply chain, and the transportation distances and carbon dioxide (CO2) emissions factors for individual transportation modes. Inputs for background data are itemized in the GREET dependency file in the 45ZCF-GREET package.

The user must enter all other parameters, considered foreground data. Examples of these parameters include feedstock type, the type and quantity of energy used for transportation fuel production, and the quantity of transportation fuel and other fuels produced. Additional details can be found in **Table 5**.

# 2 Methodology

This section presents the methodology used in 45ZCF-GREET to calculate the life cycle GHG emissions of transportation fuel production pathways via technologies currently represented in the tool.

### 2.1 Functional Unit

Section 45Z generally allows credit for each gallon (or, for fuels that are gaseous at ambient conditions, GGE) of transportation fuel that has practical and commercial fitness for use as a fuel in a highway vehicle or aircraft or may be blended into a fuel mixture which has practical and commercial fitness for use as a fuel in a highway vehicle or aircraft, per Notice 2025-10. The amount of the credit depends in part upon the emissions rate, expressed as kg of CO<sub>2</sub>e per MMBtu using the fuel's lower heating value (LHV).<sup>4</sup> For gaseous fuels, the quantity of fuel produced is converted to GGE using a LHV of 122.5 MJ (116,090 Btu) per GGE. 45ZCF-GREET uses a functional unit of 1 megajoule (MJ) of fuel, on a LHV basis. This functional unit is used to calculate a transportation fuel's lifecycle GHG emissions rate. The emissions rate is used to calculate the emission factor, for the purposes of § 45Z, which is equal to the quotient of— **(I)** an amount equal to **(aa)** 47.4 grams (g) of CO<sub>2</sub>e per MJ (50 kg of CO<sub>2</sub>e per MJ (50 kg of CO<sub>2</sub>e per MJBtu).

For gaseous fuels, the amount of the tax credit to be claimed must be calculated on a per-GGE basis using the LHV per Notice 2025-10. **Table 1** provides LHVs and GGEs for selected gaseous transportation fuels.

Fuel	Lower Heating Value	Appropriate Gallon Gasoline Equivalent
Gasoline (E0)	116,090 Btu/gal (18,680 Btu/lb)	1.00
Propane (LPG)	19,873 Btu/lb	1 lb = 0.17 GGE
Propane Fuel Mix (from HEFA Process)	18,568 Btu/lb	1 lb = 0.16 GGE
CNG (Including CNG from RNG)	20,267 Btu/lb	1 lb = 0.17 GGE
LNG (Including LNG from RNG)	20,908 Btu/lb	1 lb = 0.18 GGE
Hydrogen	51,585 Btu/lb	1 lb = 0.44 GGE (1 kg = 0.98 GGE)

Table 1. Lower Heating Value and Gallon Gasoline Equivalent for Selected Transportation Fuels thatExist as a Gas at Ambient Conditions (60 degrees F, 1 atm)

<sup>&</sup>lt;sup>4</sup> LHV refers to the value of the heat of combustion of a fuel measured by allowing all products of combustion to remain in the gaseous state. This method of measure does not take into account the heat energy put into the vaporization of water (heat of vaporization).

### 2.2 Greenhouse Gases

45ZCF-GREET accounts for methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and CO<sub>2</sub> in its representation of GHG emissions, and it uses the global warming potentials (GWP) of these gases to determine grams of CO<sub>2</sub>e released per MJ of transportation fuel produced and consumed (i.e., g CO<sub>2</sub>e/MJ fuel). The model uses GWP values characterized on the basis of a 100-year timeframe (i.e., GWP100) from the Intergovernmental Panel on Climate Change (IPCC) Assessment Report 5 (AR5). **Table 2** below presents GWPs of the three GHGs using AR5.<sup>5,6</sup>

Table 2, 100-Year Global	Warming Potentials of	f CO <sub>2</sub> , CH <sub>4</sub> , and N	J₂O in IPCC Assessment Report
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IPCC Assessment Report	CO2	CH4	N2O
Assessment Report 5	1	28	265

### 2.3 Eligible Transportation Fuels, Conversion Pathways, and Feedstocks

Section 45Z defines transportation fuel as a fuel that (1) is suitable for use as a fuel in a highway vehicle or aircraft, (2) has an emissions rate which is not greater than 47.4 g of CO<sub>2</sub>e per MJ (50 kg of CO<sub>2</sub>e per MMBtu), and (3) is not derived from coprocessing monoglycerides, diglycerides, triglycerides, free fatty acids, or fatty acid esters (or materials derived from such materials) with a feedstock which is not biomass. In addition to these requirements for all transportation fuels, § 45Z differentiates between SAF and non-SAF fuels, with different rates for each. Section 45Z defines SAF as liquid fuel, the portion of which is not kerosene, that: (1) meets fuel quality standard ASTM International Standard D7566 (Standard Specification for Aviation Turbine Fuel Containing Synthesized Hydrocarbons)<sup>7</sup> or the Fischer-Tropsch provisions of ASTM International Standard D1655, Annex A1; and (2) is not derived from palm fatty acid distillates or petroleum.

As noted, the 45ZCF-GREET model is specific to the calculation of GHG emissions rates for the 45Z tax credit and thus its use is not appropriate for other purposes, including for determining eligibility for other tax credits or other Federal programs except where specifically referenced in the provisions for such tax credits or programs.

<sup>&</sup>lt;sup>5</sup> GWPs of GHGs are published periodically by the Intergovernmental Panel on Climate Change (IPCC). The Fifth Assessment Report GWPs are currently utilized in reporting to the United Nations Framework Convention on Climate Change.

See: Subsidiary Body for Scientific and Technological Advice, "Common metrics used to calculate the carbon dioxide equivalence of anthropogenic greenhouse gas emissions by sources and removals by sinks," UNFCC; 2022, Sharm el-Sheikh. <u>unfccc.int/sites/default/files/resource/sbsta2022\_L25a01E.pdf</u>

<sup>&</sup>lt;sup>6</sup> The GWP of methane per IPCC AR5, and agreed for use in the Paris Agreement and the U.S Nationally Determined Contribution, is 28. 45ZCF-GREETadditionally accounts for radiative forcing impacts of carbon dioxide added to the atmosphere due to oxidation of fossil-based methane, which is depicted in 45ZCF-GREET by increasing the GWP value by 2, consistent with alternative GWP values published in Table 8.A.1 in Chapter 8 of the IPCC AR5 report, <u>www.ipcc.ch/report/ar5/syr/</u>.

<sup>&</sup>lt;sup>7</sup> See <u>www.astm.org/d7566-22.html</u>.

45ZCF-GREET calculates lifecycle GHG emissions associated with certain fuels and pathways that correspond to the low-GHG fuels that were identified in IRS Notices 2024-49, Notice 2025-10, and Notice 11: SAF, biodiesel, ethanol, hydrogen, natural gas (including renewable natural gas (RNG)) diesel, gasoline (including naphtha), and liquefied petroleum gas (LPG)/propane. **Table 3** summarizes the definitions of the non-SAF fuels in Notice 2025-10 and identifies the relevant pathways listed in IRS Notice 2025-11 and included in 45ZCF-GREET. These fuels and pathways were selected based on current and expected near-term production of transportation fuels that are likely to meet the eligibility requirements for the 45Z tax credit. As shown in **Table 3**, fuels identified in IRS Notice 2024-49 and defined in Notice 2025-10 but not currently included in 45ZCF-GREET 2025 include butanol, dimethyl ether, and methanol.

Non-SAF Fuel	Corresponding 45ZCF-GREET Fuel/Pathway(s)	Definition	Specifications
Low-GHG biodiesel	Biodiesel (transesterification)	Monoalkyl esters of long-chain fatty acids	ASTM D6751
Low-GHG butanol	N/A	Mixture of n-butyl, sec- butyl, and iso-butyl alcohols	ASTM D7862
Low-GHG diesel fuel	Renewable diesel (HEFA, gasification and Fischer-Tropsch, ATJ- ethanol)	Liquid fuel, including renewable diesel	ASTM D975
Low-GHG dimethyl ether	N/A	Gaseous fuel, including renewable dimethyl ether	ASTM D7901
Low-GHG ethanol	Ethanol (fermentation)	Ethyl alcohol that is a liquid fuel for blending with gasolines	ASTM D4806
Low-GHG gasoline	Naphtha (HEFA)	Liquid fuel, including renewable gasoline	ASTM D4814
Low-GHG hydrogen	Hydrogen (hydrogen)	Gaseous or liquid fuel	SAE J2719
Low-GHG liquefied petroleum gas (LPG)	Propane (HEFA)	Liquefied gases, including low-GHG propane	ASTM D1835
Low-GHG methanol	N/A	Methyl alcohol that is a liquid fuel	ASTM D1152/D5797
Low-GHG methanol	N/A	Methyl alcohol that is a liquid fuel	ASTM D1152/D5797

 Table 3. Definitions and Specifications that May Qualify as a Non-SAF Transportation Fuel

Non-SAF Fuel	Corresponding 45ZCF-GREET Fuel/Pathway(s)	Definition	Specifications
Low-GHG natural gas	RNG (anaerobic digestion and upgrading: animal manures, wastewater sludge, landfill gas), coal mine methane (CMM) capture and upgrading	Natural gas suitable for use in transportation	ASTM D8080ª

<sup>a</sup> Except the compression requirements. Users enter the pressure of produced RNG into 45ZCF-GREET, which will calculate any additional emissions associated with transport and compression of RNG or CMM to 4,800 psia.

Under Notice 2025-11, if a taxpayer's taxable year began before the publication of 45ZCF-GREET (for example, on January 1, 2025), the taxpayer must use 45ZCF-GREET for the entire taxable year. Additionally, if an updated version of the 45ZCF-GREET model becomes publicly available after the first day of the taxable year of production (but still within such taxable year), then the taxpayer may, in its discretion, treat such version as the most recent version of the 45ZCF-GREET model.

For all fuels, 45ZCF-GREET calculates well-to-wheels emissions rates based on their use as a transportation fuel. Under Notice 2025-11, to claim the 45Z tax credit for hydrogen production, claimants are directed to use the most recent version of the 45VH2-GREET model, to calculate a well-to-gate emission rate.

45ZCF-GREET offers a single pathway for hydrogen, which provides a space for users to enter a 45VH2-GREET-modeled emissions rate per kg of hydrogen produced at a pressure of 300 psia. Users may enter an emissions rate produced by 45VH2-GREET or as the result of a PER application through the 45V tax credit. 45ZCF-GREET then calculates the additional emissions resulting from hydrogen compression to 700 bar (10,152.6 psia) at a temperature of -40°C, delivery as a gas in tube trailers via truck with a distance of 200 miles, and additional precooling and compression at the fueling station to generate a well-to-wheels emissions rate per MJ of hydrogen for the purposes of claiming the 45Z tax credit.

Several pathways in 45ZCF-GREET can be used to produce fuels from multiple primary feedstocks, which are enumerated in Notice 2025-11. **Table 4** below summarizes the primary feedstocks that are included in each GREET pathway. All pathways are based on the assumption that transportation fuel production occurs in the United States or a U.S. territory as is required to qualify for the 45Z tax credit. In some cases, a production pathway may have inputs that are sourced from outside the U.S. 45ZCF-GREET includes specific feedstocks and origins based on the availability of adequate data to quantify lifecycle GHG emissions and their likelihood to: (1) be claimed by applicants; and (2) be part of a fuel pathway that achieves an emission rate below the 47.4 g CO<sub>2</sub>e per MJ (50 kg CO<sub>2</sub>e per MMBtu) threshold. For example, the Brazilian sugarcane ATJ-

Ethanol pathway assumes that sugarcane ethanol is produced in Brazil and imported to the U.S. for final conversion to SAF at domestic ATJ-Ethanol facilities.

Conversion Pathway	Primary Feedstock(s)
	U.S. soybean oil
	U.S./Canadian canola oil/rapeseed oil
	Used cooking oil (UCO) <sup>a</sup>
	Tallow
Hydroprocessed Esters and Fatty Acids (HEFA)	U.S. distillers corn oil (DCO)
	U.S. carinata oil (intermediate crop)
	U.S. camelina oil (intermediate crop)
	U.S. pennycress oil (intermediate crop)
	U.S. soybean oil
	U.S./Canadian canola oil/rapeseed oil
	U.S. used cooking oil (UCO) <sup>a</sup>
Transesterification	Tallow
Tansestermeation	U.S. distillers corn oil (DCO)
	U.S. carinata oil (intermediate crop)
	U.S. camelina oil (intermediate crop)
	U.S. pennycress oil (intermediate crop)
	U.S. corn starch
	U.S. sorghum grain
Fermentation	Brazilian sugarcane (for use as feedstock for SAF-ATJ only)
	U.S. corn stover
Alcohol-to-Jet (ATJ)	Ethanol (from fermentation pathways listed above)
Gasification and Fischer-Tropsch	U.S. corn stover
	U.S. wastewater sludge
Anaerobic Digestion and Biogas Upgrading	U.S. animal manures
	U.S. landfill gas
Coal Mine Methane (CMM) Capture and Upgrading	Coal mine methane

Table 4. Primary Feedstocks Included in 45ZCF-GREET by Conversion Pathway

Conversion Pathway	Primary Feedstock(s)
Hydrogen (well-to-gate pathways as defined in the user manual for the most recent 45VH2-GREET model, gate-to-wheels as modeled in 45ZCF-GREET)	Hydrogen (well-to-gate, 300 psia), as defined in the user manual for the most recent 45VH2-GREET model

<sup>a</sup> Per Notice 2025-10, pathways that use imported UCO will not be available in the 45ZCF-GREET model until the Treasury Department and the IRS publish further guidance. Users are instructed to enter the total UCO input quantity and the share of total UCO that is domestically sourced. 45ZCF-GREETwill provide emissions rate(s) and fuel volume(s) corresponding to the domestic UCO input only.

Note that 45ZCF-GREET, except where otherwise noted, only includes feedstocks sourced from the U.S. Specifically, canola/rapeseed oil is included for U.S. and Canadian sources. There are currently no specific restrictions on the origin of tallow, and applicants may use these pathways in 45ZCF-GREET regardless of tallow origin. Notice 2025-10 states that Treasury is considering appropriate substantiation and recordkeeping requirements for imported UCO, and that as a result, pathways that use imported UCO will not be available in 45ZCF-GREET until the Treasury Department and the IRS issue further guidance. 45ZCF-GREET includes UCO, but differentiates between U.S.-sourced UCO and imported UCO. Due to the potential for aggregators and clean fuel producers to mix domestic and imported UCO, users must enter domestic and imported UCO volumes separately and 45ZCF-GREET will identify the emissions rate for only the fuels produced with domestic UCO, consistent with Notice 2025-11.

#### 2.4 Selected Foreground Data and Decarbonization Options

45ZCF-GREET requires users to enter foreground data specific to their facility in order to generate an emissions rate for the purposes of the 45Z tax credit. 45ZCF-GREET does not offer any optional default values to use as foreground data. Users are encouraged to review Notices 2025-10 and 2025-11 before entering foreground data into 45ZCF-GREET. Foreground data for all pathways in 45ZCF-GREET include primary feedstock inputs, energy consumption related to the fuel production process, and fuel production outputs (see **Table 5**). Foreground data include multiple potential energy sources that may be used for process heat and power based on the relevance to the particular pathway and primary feedstock. For example, the corn ethanol fermentation pathway includes options to use coal and/or corn stover due to the current and potential use of these resources for heat and power, but these options are not included in all pathways. Certain pathways may also have foreground data that a user is required to enter due to unique characteristics/requirements of the fuel production process that may significantly impact a facility's emissions rate (e.g., the amount of methanol used in transesterification to produce biodiesel).

Several pathways in 45ZCF-GREET include an option to use more than one primary feedstock in the same facility—usually referred to as "Mixed Feedstock." Facilities that use more than one primary feedstock are directed to calculate separate GHG emissions rates corresponding to the quantity of fuel produced from each of those feedstocks. 45ZCF-GREET uses a mass balance allocation based on the relative mass of each primary feedstock. For example, a HEFA facility that converts a combination of soybean

oil and DCO will generate two GHG emissions rates for each fuel it produces, corresponding to the portion of each fuel generated from soybean oil and the portion generated from DCO.

45ZCF-GRE	ET Input Data	Ethanol Fermentation	ATJ to Ethanol	Transesterification	HEFA	Gasification and FT	AD and Biogas Upgrading	Hydrogen	
Primary Feeds	Primary Feedstock(s)								
	Feedstock Amount(s)								
Production Process									
	Grid Electricity	$\boldsymbol{\wedge}$			$\boldsymbol{\bigtriangleup}$		$\boldsymbol{\wedge}$	N/A	
	Onsite Behind- the-Meter (BTM) Electricity	<b>A</b>				۵		N/A	
Energy Sources for Heat and	Imported Renewable Electricity: Energy Attribute Credit (EAC)							N/A	
Power	Fossil Natural Gas		Δ	Δ	Δ			N/A	
	45Z Modeled Renewable Natural Gas						N/A	N/A	
	Coal	$\boldsymbol{\wedge}$	N/A	$\boldsymbol{\bigtriangleup}$	N/A	$\boldsymbol{\bigtriangleup}$	N/A	N/A	
	Agricultural Residue		N/A	N/A	N/A	N/A	N/A	N/A	
	Methanol	N/A	N/A	$\boldsymbol{\bigtriangleup}$	N/A	N/A	N/A	N/A	

Table 5. Example Transportation Fuel Production Pathways in 45ZCF-GREET with Selected Foreground and Background Data

45ZCF-GREI	ET Input Data	Ethanol Fermentation	ATJ to Ethanol	Transesterification	HEFA	Gasification and FT	AD and Biogas Upgrading	Hydrogen
Imported Chemical	Offsite, Fossil SMR Hydrogen	N/A		N/A		N/A	N/A	N/A
Inputs	Offsite, 45V Modeled Hydrogen	N/A		N/A		N/A	N/A	N/A
Carbon Captu	re and Storage		$\boldsymbol{\wedge}$	N/A	N/A		N/A	N/A
				Fuel Output				
	Aviation Fuel AF)	N/A		N/A			N/A	N/A
	Ethanol	$\boldsymbol{\bigtriangleup}$	N/A	N/A	N/A	N/A	N/A	N/A
	Biodiesel	N/A	N/A		N/A	N/A	N/A	N/A
	Renewable Diesel	N/A		N/A	$\boldsymbol{\bigtriangleup}$		N/A	N/A
Non-SAF	Naphtha	N/A	N/A	N/A	$\boldsymbol{\bigtriangleup}$	N/A	N/A	N/A
Fuels	Propane	N/A	N/A	N/A	$\triangle$	N/A	N/A	N/A
	Renewable Natural Gas	N/A	N/A	N/A	N/A	N/A		N/A
	Hydrogen (300 psia)	N/A	N/A	N/A	N/A	N/A	N/A	
	Co-Product Outputs							
Non-Fuel C	Co-Products	•	N/A	$\boldsymbol{\bigtriangleup}$	N/A	N/A	N/A	N/A
			Transpo	rtation, Conditioning an	d End Use			
Transportation	Feedstock and Intermediate	•	•	•	•	•	•	•

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45ZCF-GREE	ET Input Data	Ethanol Fermentation	ATJ to Ethanol	Transesterification	HEFA	Gasification and FT	AD and Biogas Upgrading	Hydrogen
	Transport to Fuel Production Facility							
Conditioning	Fuel Blending or Conditioning for Use in Transportation	•						
Transportation and End Use	Finished Fuel Transportation and End Use	•	•	•	•	•	•	•

Green triangles indicate foreground data and red dots indicate selected background data. Most foreground data require numeric inputs by the user. Foregrounded options may vary based on pathway and feedstock. For example, Brazilian sugarcane ethanol assumes Brazilian grid mix and does not provide certain decarbonization options, such as Carbon Capture Utilization and sequestration.

ATJ = Alcohol-to-Jet, HEFA = Hydroprocessed Esters of Fatty Acids, FT = Fischer-Tropsch, AD = Anaerobic Digestion

Upstream emissions from feedstock production are calculated from background data. Likewise, emissions from transporting the feedstock and/or intermediates to the production facility are also calculated from background data for several reasons. Feedstock transport emissions are typically a small fraction of a fuel's lifecycle GHG emissions rate (<5 gCO<sub>2</sub>e/MJ), even in cases where feedstock is sourced internationally because of the comparatively low energy-intensity of marine shipping relative to truck or rail. Including feedstock transport modes and distances in foreground data inputs increases the complexity of modeling and could lead to unintended effects (e.g., transport distances for biofuel feedstocks may become shorter while distances for other uses such as food/feed could become longer).

Emissions associated with conditioning the fuel for transportation use are also calculated from background data. For example, background data is used to calculate emissions associated with compressing RNG and CMM for transportation use. Lastly emissions associated with transporting the finished fuel to the point of use and the emissions from its end use are also calculated from background data. The background data for gate-to-wheels are based on typical logistics for each fuel's use in a transportation application. 45ZCF-GREET also includes any compression and/or cooling necessary to transport gaseous fuels and make them suitable for final vehicle fueling. The inclusion of gate-to-wheels emissions as background data avoids the requirement for users to track the final use of each fuel and also avoids unintentionally advantaging fuels sold and used for non-transportation purposes if such applications result in lower emissions (e.g., due to reduced compression requirements for gaseous fuels not delivered to vehicle fueling stations).

As stated in the 45Z Notice 2025-10, clean fuel producers may use low-carbon inputs consistent with the guidelines established in the 45V Regulations to reduce the GHG emissions rate of their fuel. 45ZCF-GREET aligns with this guidance and includes the ability to use electricity from zero or minimally emitting sources directly or through the use of energy attribute certificates (EACs), and natural gas alternatives (through a direct pipeline connection to a supplier of natural gas alternatives or documentation of other physical methods of exclusive delivery).<sup>8</sup> Where relevant, certain pathways also include options to use clean hydrogen as a chemical input (e.g., HEFA), and Carbon Capture Utilization and sequestration (e.g., Fermentation) to achieve a lower GHG emissions rate, if consistent with the rules established under the 45V Regulations.

#### 2.4.1 Accounting for Electricity in 45ZCF-GREET

The accounting of electricity in 45ZCF-GREET aligns with the 45V Regulations, reflecting a shared statutory direction to account for lifecycle greenhouse gas emissions as described in 42 U.S.C. 7545(o)(1)(H). When specifying the source of electricity consumed, users may represent either (1) electricity from a specific generator or combination of generators, or (2) the average annual grid mix in the region that the

<sup>&</sup>lt;sup>8</sup> Under the Final Regulations, use of gas energy attribute certificates (i.e., RNG book and claim) under certain conditions may become available in future years upon a determination by the Secretary of the Treasury. Until such determination is made and Treasury and IRS issue further guidance, taxpayers may not use gas energy attribute certificates.

transportation fuel production facility is located in. Regions within 45ZCF-GREET are depicted as defined in the DOE National Transmission Needs study<sup>9</sup> in alignment with the 45V Regulations. These regions are hereafter referred to as "Needs Study regions". These two options are described below.

Option 1-Energy attribute certificates (EACs). This option, labeled "Imported Renewable Electricity: Energy Attribute Credits (EACs)," allows users to specify an amount of electricity purchased from one or more specific sources. The current version of 45ZCF-GREET allows users to enter certain purchases of electricity from sources that are modeled as zero-emission in 45VH2-GREET, specifically solar, wind, and hydroelectricity. Other electricity sources modeled in 45VH2-GREET are not currently available in 45ZCF-GREET. We intend for future updates to include additional generator types, allowing users to use an emissions rate associated with additional types of generators (i.e., geothermal, nuclear, natural gas turbines with and without carbon capture utilization and sequestration (CCUS), coal, and/or residual oil combustion) or combination of generators, provided that (a) an emissions profile is available for the subject generator(s) in 45ZCF-GREET, and (b) that any electricity that is claimed to be sourced from the subject generator(s) in a given calendar year is verified via the purchase (or generation, in the case of behind-the-meter power) and retirement of qualifying EACs, which are EACs that meet specified criteria provided in the 45V Regulations.

For behind-the-meter (BTM) power generation entered into 45ZCF-GREET, EACs must be generated and retired as described above. Users enter the quantity of EACs generated and retired from power generated on-site in the input cell titled "Onsite Behind-the-Meter Electricity (BTM)". Any fuels consumed for generation of BTM electricity are included in the transportation fuel production facility's energy balance and entered as user inputs to 45ZCF-GREET. This ensures that BTM power supplied through an on-site combined heat and power system is properly accounted for in the facility's overall mass and energy balance. Users may account for BTM power to the amount needed to meet 100% of a facility's needs, but users may not enter a BTM electricity value that exceeds the facility's gross electricity consumption, even if the facility is a net exporter of electricity. Users may not enter a negative value in any electricity consumption input cell in 45ZCF-GREET.

As further described in the 45V Regulations, the criteria specified in the 45V Regulations are important guardrails to ensure that the transportation fuel producer's electricity use can be reasonably deemed to reflect the emissions associated with the specific generators from which the EACs were purchased and retired.<sup>10</sup> The criteria include:

<sup>&</sup>lt;sup>9</sup> Department of Energy: National Needs Transmission Study Oct 2023

<sup>&</sup>lt;sup>10</sup> It is important to note that 45ZCF-GREET includes estimates of emissions associated with electricity generation from specific power generator types by using an attributional LCA approach in conjunction with a basic representation of consequential/induced grid considerations. Per the latter, 45ZCF-GREET requires that any electricity that users input from specific power generator types meet the requirements

- Deliverability: the electricity generator is located in the same region as the transportation fuel producer (as discussed in the Electricity Grid Regions section below);
- Temporal matching: the electricity generation occurs at a relevant time in relation to the time of consumption, as defined in the 45V Regulations; and
- Incrementality: the generator meets criteria designed to ensure the electricity is incremental, as defined in the 45V Regulations.

Additional details regarding these criteria are provided in the 45V Regulations.

**Option 2–Grid power.** For electricity that is consumed in the respective calendar year from source(s) other than those described in Option 1, users must assume that the electricity has an emissions profile that reflects the annual average GHG emissions intensity of electricity in the Needs region in which the qualified facility is located, as determined by the 45ZCF-GREET model. Users are directed to select the appropriate choice in the "Needs Region Electricity Source" drop-down menu and enter the amount of electricity consumed in the "Electricity: Grid Consumption" input cell. The emissions factors for electricity consumption from each region (kg CO<sub>2</sub>e/kWh) are based on: 1) 2023 EIA reporting identifying the amount of electricity generated by specific types of generation in each region,<sup>11</sup> 2) emissions factors from the EPA's Emissions & Generation Resource Integrated Database (eGRID) 2022<sup>12</sup> to estimate direct emissions from each type of generator, 3) emissions factors from R&D GREET 2024 to estimate upstream emissions associated with each type of feedstock consumed, and 4) estimates of transmission and distribution losses within each region, based on state level reporting to the EIA. More information describing the analysis that yielded emissions factors for each region is available in the technical report.<sup>13</sup>

Any imported electricity that is not substantiated via IRS's requirements for qualifying EACs must be assumed to be sourced from the facility's Needs region (Option 2) and input into 45ZCF-GREET accordingly. Users may also exercise a combination of Options 1 and 2 representing the portion of electricity consumption that meets the criteria for each option and enter the corresponding electricity consumption values into 45ZCF-GREET accordingly.

#### **Electricity Grid Regions**

Deliverability of electricity in 45ZCF-GREET is treated in a manner that aligns with the 45V Regulations, which specify that an EAC meets the deliverability requirements if the electricity represented by the EAC is generated by a source that is in the same U.S. region as the qualified transportation fuel production facility. The guidance further

for temporal matching, regional matching, and incrementality defined in the 45V Regulations, thereby characterizing via proxy the lifecycle GHG emissions, including potential induced grid emissions, associated with electricity consumption.

<sup>&</sup>lt;sup>11</sup> www.eia.gov/electricity/data/eia923/

<sup>&</sup>lt;sup>12</sup> www.epa.gov/egrid/egrid-technical-guide

<sup>&</sup>lt;sup>13</sup> greet.anl.gov/publication-ele ci needs

defines the term "region" to mean a region derived from the National Transmission Needs Study (hereafter referred to as the Needs Study) that was released by DOE on October 30, 2023. These regions and corresponding emissions factors are represented in 45ZCF-GREET.

DOE has mapped U.S. Balancing Authorities to the regions defined in the Needs Study. The resulting regions can be found in **Figure 2**, which maps the regions established in the Needs Study, and **Table 6**, which links balancing authorities to Needs Study regions. Consistent with the 45V Regulations, the location of a generation source and the location of a transportation fuel production facility is based on the U.S. Balancing Authority to which it is electrically interconnected (not its geographic location), with each balancing authority linked to a single region. The Midcontinent Independent System Operator (MISO) balancing authority is an exception because it is split into two U.S. regions, as shown in **Figure 2**, consistent with the Needs Study and as referenced in the 45V Regulations.

Though not depicted in **Figure 2** or **Table 6**, as per the 45V Regulations, Alaska and Hawaii are treated as two additional regions within the context of the EAC deliverability requirements, one covering the entirety of Hawaii and the other the entirety of Alaska. Similarly, as per the 45V Regulations, each U.S. territory is considered a separate region.

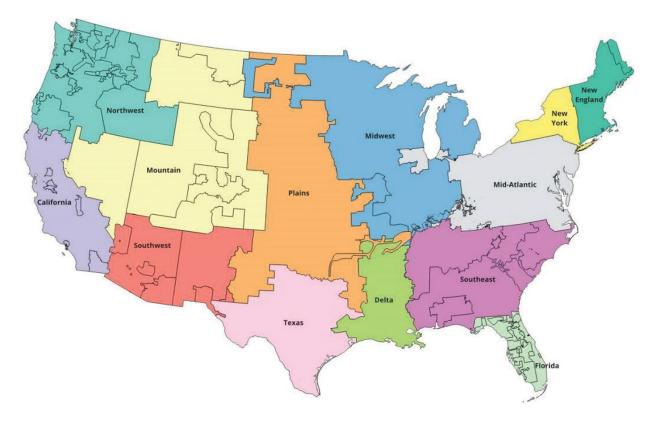


Figure 2. 45Z regions based on National Transmission Needs Study<sup>14</sup>

Balancing Authority	Needs Region
Balancing Authority of Northern California	California
California Independent System Operator (Balancing Authority)	California
Imperial Irrigation District	California
Los Angeles Dept of Water & Power	California
Turlock Irrigation District	California
Midcontinent ISO (Balancing Authority): South, see map	Delta
Duke Energy Florida Inc	Florida
Florida Municipal Power Pool	Florida
Florida Power & Light	Florida
Gainesville Regional Utilities	Florida

Table 6. U.S. Balancing Authorities Linked to Regions Identified in Needs Study

<sup>&</sup>lt;sup>14</sup> U.S. Department of Energy. 2023. National Transmission Needs Study. www.energy.gov/sites/default/files/2023-12/National%20Transmission%20Needs%20Study%20-%20Final\_2023.12.1.pdf?.

Balancing Authority	Needs Region
Homestead (City of)	Florida
JEA	Florida
New Smyrna Beach Utilities Commission	Florida
Reedy Creek Improvement District	Florida
Seminole Electric Coop Inc	Florida
Tallahassee FL (City of)	Florida
Tampa Electric Co	Florida
East Kentucky Power Coop Inc	Mid-Atlantic
LG&E & KU Services Co	Mid-Atlantic
Ohio Valley Electric Corp	Mid-Atlantic
PJM Interconnection	Mid-Atlantic
Associated Electric Coop Inc	Midwest
Electric Energy Inc	Midwest
GridLiance Heartland	Midwest
Midcontinent ISO (Balancing Authority): North, see map	Midwest
NaturEner Power Watch LLC (GWA)	Mountain
NaturEner Wind Watch LLC	Mountain
Nevada Power Co	Mountain
Northwestern Energy	Mountain
PacifiCorp East	Mountain
Public Service Co of Colorado	Mountain
WAPA Rocky Mountain Region	Mountain
WAPA Upper Great Plains West	Mountain
New England ISO (Balancing Authority)	New England
Northern Maine	New England
New York ISO (Balancing Authority)	New York
Avangrid Renewables LLC	Northwest
Avista Corp	Northwest
Bonneville Power Administration	Northwest
Gridforce Energy Management LLC	Northwest
Idaho Power Co	Northwest

Balancing Authority	Needs Region
PacifiCorp West	Northwest
Portland General Electric	Northwest
PUD No 1 of Chelan County	Northwest
PUD No 1 of Douglas County	Northwest
PUD No 2 of Grant County	Northwest
Puget Sound Energy Inc	Northwest
Seattle City Light	Northwest
Tacoma Power	Northwest
Southwest Power Pool (Balancing Authority)	Plains
Southwestern Power Administration	Plains
Alcoa Power Generating Inc Yadkin Division	Southeast
Duke Energy Carolinas LLC	Southeast
Duke Energy Progress East	Southeast
Duke Energy Progress West	Southeast
PowerSouth Energy Coop	Southeast
South Carolina Electric & Gas Co	Southeast
South Carolina Public Service Authority	Southeast
Southeastern Power Administration (Southern)	Southeast
Southern Co Services Inc	Southeast
Tennessee Valley Authority	Southeast
Arizona Public Service Co	Southwest
Arlington Valley LLC	Southwest
El Paso Electric	Southwest
Gila River Power LLC	Southwest
Griffith Energy LLC	Southwest
New Harquahala Generating Co LLC	Southwest
Public Service Co of New Mexico	Southwest
Salt River Project	Southwest
Tucson Electric Power Co	Southwest
WAPA Desert Southwest Region	Southwest
ERCOT ISO (Balancing Authority)	Texas

#### Emissions factors associated with each of these regions are itemized in Table 7.

Table 7. Emissions Factors Corresponding to Each Needs Region per Kilowatt-Hour at the Point of
Consumption

Needs Region	Emissions Factor (kg CO₂e/kWh)
California	0.24
Delta	0.45
Florida	0.45
Mid-Atlantic	0.41
Midwest	0.58
Mountain	0.63
New England	0.32
New York	0.28
Northwest	0.16
Plains	0.47
Southeast	0.38
Southwest	0.40
Texas	0.40
Alaska	0.58
Hawaii	0.76

#### 2.4.2 Natural Gas Alternatives as an Input to Transportation Fuel Production

Transportation fuel production facilities typically require natural gas or renewable natural gas (RNG), which can be combusted to generate process heat and/or electricity. Natural gas or RNG can also be reformed to hydrogen via steam methane reforming (SMR). 45ZCF-GREET enables users sourcing natural gas alternatives as an input for fuel production to claim the emissions profile of externally sourced RNG that is directly supplied (see **Table 5**). RNG sources currently included in 45ZCF-GREET are 1) landfill gas, 2) wastewater sludge, and 3) animal manures. In the case of landfill gas, the gas is captured via a gas collection system and upgraded to RNG. In the cases of wastewater sludge and animal manures, these materials are fed into anaerobic digesters where biogas is generated and captured for upgrading to RNG. 45ZCF-GREET also includes alternative natural gas from coal mine methane (CMM) capture and upgrading. These sources are modeled in 45ZCF-GREET in alignment with the 45V Regulations, including assumptions about leakage rates at the RNG upgrader.

If biogas, CMM or RNG is both produced *and* used on-site at a transportation fuel production facility whose fuel output is not RNG (e.g., biogas produced on-site and combusted as a process fuel), the resulting energy use and emissions are included in the facility-level energy and mass balances entered as foreground data in 45ZCF-GREET and this biogas, CMM or RNG is not entered as a separate input because it is not externally sourced.

Users are directed to calculate the emissions rate for externally sourced RNG by running 45ZCF-GREET for the applicable RNG pathway(s), selecting "Process Fuel" as the end use of the RNG within the "Selections" section of the model, to obtain emissions rates for each source of RNG, which are subsequently entered into 45ZCF-GREET (GHG-intensity entered in "45Z Modeled RNG CI") alongside the quantities consumed (entered in "45Z Modeled RNG"). If users purchase RNG as a process fuel from multiple external sources, the total quantity can be entered along with a mass-weighted average CI value for all applicable RNG. All other requirements for externally sourced RNG are consistent with the 45V Regulations. Users are directed to enter any other external natural gas or natural gas alternative source for which a 45ZCF-GREET pathway is not available in the total natural gas consumption user input.

#### 2.4.3 Hydrogen as an Input to Transportation Fuel Production

Some transportation fuel production facilities, including HEFA and ATJ facilities, require hydrogen as an input, which can be produced on-site or sourced from a separate facility. Transportation fuel production facilities purchasing hydrogen from an offsite facility will enter their hydrogen consumption as foreground data in 45ZCF-GREET. The user may enter the quantity of hydrogen consumed from two possible sources:

- Hydrogen produced offsite that is derived from fossil gases (including natural gas) without carbon capture utilization and sequestration (CCUS) (user input titled: "Offsite, Fossil SMR Hydrogen"). Any hydrogen purchased from an offsite production facility that does not have a modeled 45V carbon intensity is entered in the "Offsite, Fossil SMR Hydrogen" input cell, regardless of how it was produced.
- Hydrogen that has been modeled using 45VH2-GREET (user inputs titled: "Offsite, 45V Modeled Hydrogen" and "Offsite, 45V Modeled Hydrogen CI"). The user-entered carbon intensity (CI) is based on output from 45VH2-GREET or the result of a provisional emissions rate (PER) application through the 45V tax credit. If the production facility purchases multiple hydrogen sources with different CIs, as mass-weighted average of the individual CIs is entered along with the sum of hydrogen purchased. 45ZCF-GREET uses background data to estimate transportation distances and calculate the GHG emissions footprint for the transportation and additional compression, based on an assumption of pipeline transportation and a distance of 680 miles.

If a transportation fuel production facility generates its own hydrogen on-site, that quantity of hydrogen should not be entered separately into 45ZCF-GREET as hydrogen consumption. Instead, the inputs for this hydrogen production are to be included in the overall mass and energy balance of the facility. Thus, any electricity, natural gas, other fossil gases, or RNG required for on-site hydrogen production is to be included in the reported facility energy consumption for the calendar year in which the fuel production occurred.

#### 2.4.4 Carbon Capture Utilization and Sequestration

CCUS is incorporated into 45ZCF-GREET for domestic ethanol pathways and gasification with Fischer-Tropsch synthesis pathways. The total quantity of  $CO_2$  captured and stored is a user input in 45ZCF-GREET; users are directed to enter the annual quantity of  $CO_2$  captured and stored in U.S. Class VI and/or Class II wells (calculated for the calendar year in which the fuel production occurred). Users may not enter a value for  $CO_2$  captured and stored that exceeds the value of their total fossil and biogenic  $CO_2$  emissions.  $CO_2$  capture and use in other applications, such as incorporation into a product, is not included as an option for reducing the GHG emissions rate of transportation fuels in 45ZCF-GREET.

#### 2.4.5 Agricultural Residues as Process Fuel for Transportation Fuel Production

45ZCF-GREET provides the option for entering agricultural residues that are used as an alternative process fuel for generating heat and electricity at transportation fuel production facilities. For the current version, users may enter the total intake of two specific crop residues: corn stover and sorghum stubble. Corn stover and sorghum stubble quantities are summed and entered as an annual total, along with the massweighted average moisture content of delivered biomass, in the "Agricultural Residue Input" and "Agricultural Residue Moisture Content" input cells, respectively. This material may be combusted as a solid fuel or gasified to syngas that is ultimately combusted. The option of using crop residues as an alternative fuel is available in corn and sorghum ethanol pathways. The use of bagasse in Brazilian sugarcane ethanol is incorporated as background data. Although transportation fuel producers may choose to export excess electricity or steam generated using these residues, 45ZCF-GREET does not apply a displacement credit for excess electricity or steam exported from the facility. 45ZCF-GREET accounts for additional fertilizer inputs and fuel use specifically associated with the collection and removal of agricultural residues from the field. It assumes that crop residues are sourced in a manner that does not result in significant emissions from the diversion of crop residues from other productive uses.

#### 2.5 Additional Background Data in 45ZCF-GREET

Background data in 45ZCF-GREET is itemized in the dependency file in the downloaded tool package. For convenience, examples of background data values are described in the subsequent sections.

#### 2.5.1 Upstream Methane Emissions for Natural Gas

45ZCF-GREET assumes that methane leakage during the natural gas recovery process and subsequent gas processing and transmission sums to ~0.9% of methane consumed. Fugitive methane emissions resulting from methane slip in specific combustion technologies (e.g., industrial boilers, gas turbines, and SMR) are accounted for separately in the model. These emissions are described further in other GREET documentation.<sup>15</sup>

#### 2.5.2 Counterfactuals for Organic Waste, Biogas, and Coal Mine Methane

45ZCF-GREET relies on assumed counterfactuals for organic waste and biogas when calculating the net GHG emissions (or avoidance) resulting from their diversion to transportation fuel production. For landfill gas, 45ZCF-GREET relies on the assumption that landfill gas would typically be captured and flared. Biogas from wastewater sludge anaerobic digesters adopts a counterfactual consistent with incumbent wastewater sludge management practices. These default wastewater treatment practices are defined such that approximately 55% of biogas of is combusted to heat the digester, 44% is flared, and 0.16% is emitted directly to the atmosphere. The counterfactual assumptions for residue/waste materials are shown in **Table 8**.

Material	Counterfactual	Relevant 45Z Pathway(s)
Manure	National average manure management as defined in <i>A Generic Counterfactual</i> <i>Greenhouse Gas Emission Factor for Life-</i> <i>Cycle Assessment of Manure-Derived</i> <i>Biogas and Renewable Natural Gas</i>	Manure RNG
Landfill gas	Landfill gas collection and flaring	Landfill gas RNG
Wastewater treatment digester biogas	Incumbent wastewater sludge management practices	Wastewater sludge RNG
Agricultural residues	Left on field	Ethanol, gasification, and Fischer-Tropsch
Coal Mine Methane (CMM)	Methane collection and flaring	Coal mine methane capture and upgrading

#### Table 8. Residue/Waste Counterfactual Assumptions

45ZCF-GREET uses a counterfactual GHG emissions value for manure-derived biogas based on the average national manure types and management practices and resulting GHG emissions, further detailed in a white paper entitled *A Generic Counterfactual Greenhouse Gas Emission Factor for Life-Cycle Assessment of Manure-Derived Biogas* 

<sup>&</sup>lt;sup>15</sup> Burnham (2024). Updated Natural Gas Pathways in GREET 2024. <u>https://greet.anl.gov/publication-update\_ng\_2024</u>.

and Renewable Natural Gas.<sup>16</sup> Consistent with the direction in Notice 2025-10, referencing the 45V Regulations, 45ZCF-GREET uses an upstream GHG emissions value of -51 g CO<sub>2</sub>e/MJ (LHV) of biomethane contained in untreated biogas produced from the manure digester. This value includes emissions associated with operating the manure digester, as well as the transport of manure and liquid/solid digestate. This value is incorporated with downstream impacts associated with biogas upgrading to RNG, compression, and transport of the RNG to fueling stations (where applicable) in 45ZCF-GREET to calculate the GHG emissions rate of manure-derived RNG.

45ZCF-GREET assumes that the counterfactual scenario for pipeline-quality gas derived from CMM is that the gas being consumed would otherwise have been flared. This counterfactual scenario aligns with the 45V Final Rule to include estimates of (a) methane emissions associated with incomplete combustion of CMM during flaring, (b) N<sub>2</sub>O emissions associated with CMM flaring, and (c) any other non-CO<sub>2</sub> emissions that result from combustion (e.g., CO).

#### 2.5.3 Examples of Key Background Data in 45ZCF-GREET

- All crushing facility data for crop-based oil is incorporated as background including energy and chemical inputs. Transportation fuel production facilities may draw from a variety of crushing facilities and verification of detailed practices at each facility is impractical for certification.
- All transport distances for feedstocks, intermediates, and final fuels are assigned with estimated national average values.
- Emissions associated with fuel conditioning that is necessary to make fuels suitable for use in transportation are based on estimated national average values. Examples include compression of alternative natural gas from CMM, RNG, or Hydrogen when the producers of these fuels intend to claim the 45Z tax credit.<sup>17</sup>
- All farm-based data for conventional farming practices in 45ZCF-GREET are background data.
- Non-liquid fuel co-products and co-product yields are assumed to be background data based on facility models.

#### 2.5.4 Market-Mediated Effects GHG Emissions Modeling

Market-mediated, also referred to as "indirect", effects include:

<sup>&</sup>lt;sup>16</sup> U.S. Department of Energy, A Generic Counterfactual Greenhouse Gas Emission Factor for Life-Cycle Assessment of Manure-Derived Biogas and Renewable Natural Gas, Washington, DC (2025), available at <u>https://www.energy.gov/45vresources</u>.

<sup>&</sup>lt;sup>17</sup> 45ZCF-GREET automatically deducts these emissions when alternative natural gas/RNG and/or 45Vmodeled Hydrogen are used as inputs to Transportation Fuel Production.

- Induced land use change (ILUC): Emissions from induced land use changes, typically resulting in a one-time pulse of emissions when new cropland is brought into production or market-driven shifts in the type and location of existing cropland occur;
- Other Crops: Longer-term net GHG emissions (potentially positive or negative) resulting from sustained changes in non-feedstock crop production (including on-farm energy use, fertilizer inputs, N<sub>2</sub>O emissions, rice paddy field CH<sub>4</sub> emissions) in response to shifts in agricultural commodity prices/demand; and
- Livestock: Longer-term net GHG emissions (potentially positive or negative) from sustained changes in livestock and poultry production driven by shifts in agricultural commodity prices/demand (including CH<sub>4</sub> emissions from enteric fermentation and emissions of CH<sub>4</sub> and N<sub>2</sub>O from manure management).

45ZCF-GREET includes indirect effects for original feedstocks that require dedicated land for production (i.e., corn, sorghum, soybeans, canola/rapeseed, sugarcane). Indirect effects for crop residues and intermediate crops were not assessed in 45ZCF-GREET because these were not determined to be potentially significant. The results per unit of original feedstock are shown in **Table 9a** and illustrative values per MJ of fuel are shown in **Table 9b**. As previously noted, the net GHG emissions for Other Crops are negative when an increase in demand for feedstocks results in a broader shift away from emissions-intensive crop production, particularly rice cultivation because of the CH<sub>4</sub> emissions that occur during flooding of rice paddy fields. Negative GHG emissions also occur in the Livestock category, driven by model-predicted shifts in the type and number of livestock and poultry produced.

The 45ZCF-GREET model relies on GHG emissions modeling of these indirect effects from changes in activities generated from the GTAP-BIO model and emission profiles of activities from different sources. This aligns with the approach previously used to estimate indirect emissions for the 40BSAF-GREET 2024 model<sup>18</sup>, which was developed in support of the 40B SAF Production Tax Credit, but utilizes the GTAP database version 11 (v11) featuring a 2017 reference year (whereas 40BSAF-GREET 2024 used the GTAP database v10 featuring a 2014 reference year). 45ZCF-GREET also expands the scope of this modeling to include non-SAF transportation fuels and feedstocks. Additional model updates or alternative approaches to assess indirect effects may be considered in future efforts such as the use of different models in a multi-model, or ensemble approach.

New GTAP-BIO modeling runs were performed to serve as the basis for estimating indirect emissions for the pathways in 45ZCF-GREET that include indirect effects, such as soy oil and canola oil HEFA; soy and canola biodiesel; and corn, sorghum and

<sup>&</sup>lt;sup>18</sup> User manual, downloadable version of the model, and additional documentation for 40BSAF-GREET 2024 is available at <u>https://www.energy.gov/eere/greet</u>

sugarcane ethanol. These modeling runs were performed on U.S. corn, U.S. soybeans, U.S. sorghum, and U.S. and Canadian canola/rapeseed, and Brazilian sugarcane.

Estimates of land use changes from GTAP-BIO were combined with a series of emissions factors included in Carbon Calculator for Land Use and Land Management Change from Biofuels Production (CCLUB) to generate LUC emissions estimates. For U.S. grassland and cropland-pasture conversion, emissions factors are derived from simulations run in the DayCent model.<sup>19</sup> For U.S. forestland conversion and all international land use change, emissions factors from AEZ-EF v54 were applied.<sup>20</sup> The resulting emissions are shown in the indirect effects field in 45ZCF-GREET and are summarized in **Table 9** and **Table 10**.

Details on GTAP-BIO modeling and emissions factors can be found in ANL technical documentation on the CCLUB module, Expansion of Carbon Calculator for Land Use and Land Management Change from Biofuels Production (CCLUB) to Address Induced Land Use Changes and Other Indirect Effects of Clean Fuel Production for R&D GREET® 2024 hereafter referred to as the "CCLUB 2024 Update" available at: <a href="https://greet.anl.gov/publication-cclub\_update\_2024">https://greet.anl.gov/publication-cclub\_update\_2024</a>.

Because modeling of land use change effects is sensitive to the geographic location of feedstock production, new modeling would be necessary if feedstocks are sourced from regions that are not represented in this analysis. For example, if U.S. clean fuel producers import feedstocks that are not represented in the R&D GREET 2024 Technical Report, new modeling runs in GTAP-BIO and/or other models would be necessary to estimate the indirect emissions resulting from this pathway.

45Z Clean Fuel(s) – Pathway	Feedstock	Total	ILUC	Livestock	Other Crops
Ethanol - Fermentation	U.S. Corn Starch	1,054	1,324	-363	93
Ethanol - Fermentation	Brazilian Sugarcane	6,217	22,000	-10,231	-5,551
Ethanol - Fermentation	U.S. Sorghum Grain	1,062	1,707	-459	-186
Biodiesel - Transesterification	U.S. Soybean Oil	2,376	2,420	-104	60
Renewable Diesel, SAF - HEFA	Soybean Oil	2,415	2,454	-95	56

Table 9. Adjusted Indirect Effects for the Clean Fuel Pathways in 45ZCF-GREE				
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<sup>&</sup>lt;sup>19</sup> One exception is for land use change to canola grown in the U.S. and Canada, for which estimates from AEZ-EF v54 are used. Canola is not represented in DayCent.

<sup>&</sup>lt;sup>20</sup> CCLUB also includes land use change emissions factors from other sources that are not used in 45ZCF-GREET analyses.

45Z Clean Fuel(s) – Pathway	Feedstock	Total	ILUC	Livestock	Other Crops
Biodiesel - Transesterification	U.S./Canadian Canola/Rapeseed Oil	262,600	239,346	-13,954	37,208
Renewable Diesel, SAF - HEFA	U.S./Canadian Canola/Rapeseed oil	267,227	242,961	-13,228	37,494

Results are presented in grams CO<sub>2</sub>e per bushel of corn/soybeans/sorghum and grams CO<sub>2</sub>e per wet metric ton of canola/sugarcane.

Table 10. Adjusted Indirect Effects for the Clean Fuel Pathways in 45ZCF-GREET (for illustrative purposes only)

45Z Clean Fuel(s) – Pathway	Feedstock	Total	ILUC	Livestock	Other Crops
Ethanol - Fermentation	U.S. Corn Starch	4.58	5.75	-1.58	0.41
Ethanol - Fermentation	Brazilian Sugarcane	3.70	13.10	-6.09	-3.31
Ethanol - Fermentation	U.S. Sorghum Grain	4.61	7.42	-2.00	-0.81
Biodiesel - Transesterification	U.S. Soybean Oil	11.68	11.9	-0.51	0.29
Renewable Diesel, SAF - HEFA	U.S. Soybean Oil	13.35	13.57	-0.53	0.31
Biodiesel - Transesterification	U.S./Canadian Canola/Rapeseed Oil	16.58	15.11	-0.88	2.35
Renewable Diesel, SAF - HEFA	U.S./Canadian Canola/Rapeseed Oil	18.30	16.64	-0.91	2.57

Results are estimated in grams CO<sub>2</sub>e per megajoule of fuel using sample yields for each pathway.

Facility-level transportation fuel conversion efficiency based on user inputs is applied to adjust the indirect effects to reflect facility-specific yields as documented in the CCLUB 2024 Update.

#### 2.6 Coproduct Allocation Methods

Transportation fuel production processes may yield co-products that are also valorized (i.e., sold by the oil, ethanol, or other transportation fuel producer or otherwise productively used). For those co-products that have been valorized, 45ZCF-GREET allows for users to account for certain co-products in the lifecycle GHG emissions of the transportation fuel production facility.

Users may only account for a co-product if it has been valorized in a process downstream of the transportation fuel production facility; co-products that were produced but not valorized may not be allocated emissions in the lifecycle GHG emissions calculation of produced transportation fuel.<sup>21</sup> For example, if LPG/propane is produced by the facility but used on-site as a process fuel (as opposed to sold to another party), that quantity of LPG/propane should *not* be entered as a product.

For net electricity exports, 45ZCF-GREET does not allocate any GHG burden to electricity sold by the fuel production facility to the grid or another entity, as consistent with the 45V Regulations and 45VH2-GREET. For all other co-products, 45ZCF-GREET uses multiple allocation methods following the default assumptions in R&D GREET 2024, including system expansion (also known as the displacement method) and energy/mass-based allocation. System expansion and physical allocation methods are described further in the International Organization for Standardization (ISO) 14044:2006.<sup>22</sup> System expansion is used when it is straightforward to identify the conventional product displaced by the co-product (e.g., soybean meal demand that can be met by distillers grains) and the quantity of the co-product is small relative to the main fuel product(s). Energy-based allocation is used to allocate burdens across multiple fuel outputs because it is a reasonable measure of their relative function and is not subject to price fluctuations that can impact market value-based allocation. 45ZCF-GREET allocates the burdens of oilseed crop production and crushing to oil and meals using mass-based allocation because energy content is not an appropriate proxy for the functional value of oils and meals (used for animal feed) and market value-based allocation is subject to instability and uncertainty caused by price fluctuations. Market value-based allocation is used to assign burdens to glycerin as a co-product from transesterification to biodiesel because neither mass nor energy content are adequate proxies for the relative function or value of biodiesel and glycerin and additional supply of glycerin resulting from biodiesel production has meaningfully impacted glycerin's market value. Table 11 itemizes the co-products that can be simulated in 45ZCF-GREET and the approach used to account for them.

Production Process(es)	Potential Coproduct(s)	Accounting Mechanism
Corn grain ethanol, sorghum grain ethanol	Distillers grains	System expansion
Corn grain ethanol/DCO, sorghum grain ethanol/sorghum oil	DCO or sorghum oil	Marginal approach, allocating only oil extraction burden to oil
Any pathway/process	Electricity	No displacement credit for exported electricity

Table 11. Coproducts in 45ZCF-GREET and Accounting Mechanisms

 <sup>&</sup>lt;sup>21</sup> Allocation of emissions to valorized co-products is standard practice in life cycle analysis, including in previously published GREET models and related publications.
 <sup>22</sup> https://www.iso.org/standard/38498.html

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Production Process(es)	Potential Coproduct(s)	Accounting Mechanism
Oilseed crushing	Oil and meals	Mass-based allocation
ATJ-Ethanol	SAF, diesel	Energy-based allocation
HEFA	Naphtha/gasoline, LPG/propane, diesel, SAF	Energy-based allocation
Gasification and Fischer Tropsch	Diesel, SAF	Energy-based allocation
Transesterification	Glycerin, heavy distillation bottoms and free fatty acids (FFA)	Market value-based allocation

# **3 User Instructions**

45ZCF-GREET is available at www.energy.gov/eere/greet.

### 3.1 45ZCF-GREET Setup

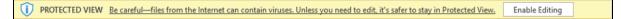
Throughout this section, the version of 45ZCF-GREET released in May 2025 is referred to as "45ZCF-GREET" and the filename for this version is 45ZCF-GREET 2025. When the 45ZCF-GREET package is downloaded, it will come in a compressed .zip package. To work with 45ZCF-GREET, users should unzip the package into a subfolder. We recommend unzipping the package into a folder that is not synced to a cloud service (e.g. OneDrive, Google Drive, or Dropbox), otherwise the model may not run properly. The unzipped package contains the 45ZCF-GREET 2025 Excel file and a subfolder "GREET1 Dependency," which contains the GREET1 model, entitled "GREET1\_2024" used to run the life cycle analysis (LCA) in 45ZCF-GREET.

When the package is first downloaded, Excel will automatically be blocked from running macros. For 45ZCF-GREET to operate correctly, users need to right click the 45ZCF-GREET file and click "Properties." At the bottom of the opened properties window, the user should click "Unblock" and "Apply" to allow macros to run within the file (**Figure 3**). This step needs to be done only once, for both the 45ZCF-GREET 2025 file and GREET1\_2024 file.

Attributes:	Read-only	Hidden	Advanced
Security:	This file came fro computer and mig help protect this o	ght be blocked to	Unblock

Figure 3. Unblocking file to allow macros

The first time the 45ZCF-GREET file is opened, users may need to enable editing and disable protected view. A message will appear as a yellow banner at the top of the Excel file. Click "Enable Editing" to allow the file to load properly (**Figure 4**).



#### Figure 4. Enable editing message

The 45ZCF-GREET 2025 file and accompanying GREET1\_2024 files are sensitive to file name changes or file path changes. While the package can be moved, users should not remove the GREET1\_2024 file from the GREET1 dependency folder. The dependency folder must be placed in the same location as the 45ZCF-GREET 2025 file. In addition, neither the file nor the GREET1 dependency folder should be renamed, as 45ZCF-GREET relies on the naming conventions of the files to work correctly.

When the 45ZCF-GREET 2025 file is loaded, it will attempt to load the GREET1\_2024 file and connect to it. If it cannot find the GREET1\_2024 file, a popup will warn users of the failed connection (**Figure 5**).

Microsoft Excel	$\times$
Could not find the GREET1_2024.xlsm workbook. Please place a copy in the GREET1_dependency folder or re-download the 45ZCF-GREET 2025.zip folder.	or
OK	

Figure 5. Error message warning that the GREET1\_2024 file could not be located

If this occurs, users must exit 45ZCF-GREET and replace the GREET1\_2024 file located in the GREET1 dependency subfolder.

### 3.2 45ZCF-GREET Overview

The Dashboard worksheet serves as the user interface, allowing the user to select a pathway to model, change key model parameters, and view modeled results (**Figure 6**).

Ethanol from Corn and Sorghum via Fermentation       Generate LCA Results         roducts (per period of operation)       arameter       Sample Input       User Input       Unit         arameter       Sample Input       User Input       Unit         roducts (per period of operation)       nillion galons         rocess Inputs (per period of operation)       arameter       User Input       Unit         edstock: Corn       0.2       million bushet       pathway in cell E6, fill in the user input         sosil Natural Cas       2.2.4       thousand MMBtu       column G, then click "Generate LCA Results         SZ Modeled RNG Cl       23.3       gCO2eMM       oal       decesses (percentage         recutural Residue Moisture Content       12%       percentage       bito         recets (per period of operation)       nillion KWh       Feedstock Transportation         arameter       User Selection       million KWh         nable/Disable Carbon Capture and Sequestration (CCS) for Grain Ethan       Selection       Selection         arameter       User Selection       Selection       ILVE         reads Region Electricity Source       Selection       Selection       ILVE         reads Region Electricity Source       Selection       Selection       ILVE	Ethanol from Corn and Sorghum via Fermentation       Generate LCA Results         roducts (per period of operation) arameter       Sample Input       User Input       Unit         arameter       Sample Input       User Input       Unit         rocess Inputs (per period of operation)       nullion galons       To display results, please select a clean for pathway in cell E6, fill in the user input column G, then click "Generate LCA Results         rocess Inputs (per period of operation)       02       million bushel         arameter       Sample Input       User Input       Unit         eedstock Corn       0.2       million bushel         ossil Natural Gas       2.2.4       thousand MMBtu         SZ Modeled RNS C1       2.3.3       gCO2e/MU         oal       4.2       short ton         orgicultural Residue Molsture Content       1.2%       per centage         gricultural Residue Molsture Content       1.2%       per centage         proted Renevable Electricity (EAC)       0.0       million kWh         nate Electricity (EAC)       0.0       million kWh         Peed Stock Transportation       Feed Stock Transportation       Feed Stock Transportation         Feed Stock Torsing pration       Selection       Selection       Life Cycle Stage         Dista	45ZCF-GR	EET 2025			
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Parameter         User Selection         Input Type           Veeds Region Electricity Source         1         Selection         IUUC           Enable/Disable Carbon Capture and Sequestration (CCS) for Grain Ethar         1         Selection         UUC           Coal Type: 1 - Bituminous, 2 - Subbituminous, 3 - Lignite         1         Selection         Livestock	Parameter         User Selection         Input Type         LEffects           Needs Region Electricity Source         1         Selection         IUUC           Enable/Disable Carbon Capture and Sequestration (CCS) for Grain Ethat         1         Selection         UUC           Coal Type: 1 - Bituminous; 3 - Lignite         1         Selection         UVestock           Coal Type: 1 - Bituminous; 3 - Lignite         1         Selection         UVestock					
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		Coal Type: 1 - Bituminous, 2 - Subbituminous, 3 - Lignite	1	Selection		
	[Fuel Production					
Fuel Production						Fuel Production
						Reset Parameters

Figure 6. Dashboard, which serves as the user interface to control the model

#### 3.2.1 Operation of 45ZCF-GREET

45ZCF-GREET allows all user interaction through the Dashboard. There are two sections to the Dashboard: the green user input side on the left, and the results section on the right. All user inputs are managed on the green, left-hand side of the model. *Sample inputs are provided as an example for the user and to test model functionality – these parameters are not used in modeling*. Additionally, 45ZCF-GREET uses a consistent color scheme: Pink cells include dropdown lists from which users select an option. The User Input columns will turn yellow when a valid parameter is entered. White and other colored cells, include instructions and results, and are not to be modified by the user. These instructions are present on the right-hand side of the model. To generate results for a pathway, users should follow the steps outlined below to input their data.

First, users select a pathway to load. Cell E6 provides a dropdown list of supported 45ZCF-GREET pathways (**Figure 7**). The User Input section will be populated with default inputs for the selected pathway. There is a small delay as Excel populates the User Input section; users should avoid interacting with Excel until the inputs are fully loaded.

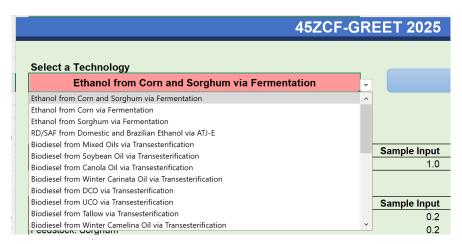


Figure 7. Drop-down list of pathways in 45ZCF-GREET

More pathways can be seen by scrolling down using the scroll bar.

Users must input their own foreground data within the User Inputs section. For the purposes of the 45Z tax credit, there is *no* option to take default foreground values (despite values being displayed under "Sample Input").

Inputs are broken down into three distinct categories: "Products", "Process Inputs", and "Selections" (described below). All energy parameters are to be entered on an LHV basis. Additionally, all parameters should be input as total values per period of operation (i.e., the calendar year).

The "Products" section (**Figure 8**) allows the user to specify the quantity of fuels and coproducts produced per period of operation. All inputs include an input name to define what the input is, a sample input for an example value, a column User Input for the user

to enter their facility-specific value, and a column with the unit of the input. Note that the User Input column will highlight yellow when filled out correctly.

Products (per period of operation)			
Parameter	Sample Input	User Input	Unit
SAF Production	59.9	59.9	million gallons
Renewable Diesel Production	3.1		million gallons

Figure 8. The Products section for RD/SAF from Domestic and Brazilian Ethanol via ATJ-E

The "Process Inputs" section (**Figure 9**) includes foreground data for inputs for the fuel production process, inputted as values per period of operation (calendar year). These inputs are always numerical inputs. All inputs include an input name to define what the input is, a sample input for an example value, a column User Input for the user to enter their value, and a column with the unit of the input. Note that the User Input cell will highlight yellow when filled out correctly. Users have the option of sourcing fossil natural gas (NG), Renewable Natural Gas (RNG), or a mixture of both (see section 2.4.2 for more details on using RNG). Hydrogen consumed for certain pathways can be sourced from fossil NG reforming without CCS ("Offsite, Fossil SMR Hydrogen") or from a source with a user-defined GHG intensity as determined in accordance with the 45V Regulations ("Offsite, 45V Modeled Hydrogen", see section 2.4.3 for more details on requirements vis-à-vis 45V). Users can also enter combinations of multiple feedstocks as inputs in the following pathways:

- Ethanol from Corn and Sorghum via Fermentation
- Renewable Diesel/SAF from Domestic and Brazilian Ethanol via ATJ-E
- Biodiesel from Mixed Oils via Transesterification.
- Renewable Diesel/SAF from Mixed Oils via HEFA.

Parameter	Sample Input	User Input	Unit
Feedstock: Corn	0.2		million bushel
Feedstock: Sorghum	0.2		million bushel
Fossil Natural Gas	22.4	22.4	thousand MMBtu
45Z Modeled RNG	0.0	0.0	thousand MMBtu
45Z Modeled RNG CI	23.3	23.3	gCO2e/MJ
Coal	4.2		short ton
Agricultural Residue Input	0.0		wet short ton
Agricultural Residue Moisture Content	12%	12%	percentage
Electricity: Grid Electricity	0.6		million kWh
Imported Renewable Electricity: Energy Attribute Credit (EAC)	0.0		million kWh
Onsite Behind-The-Meter Electricity (EAC)	0.0		million kWh

#### Process Inputs (per period of operation)

Figure 9. The Process Inputs section for Ethanol from Corn and Sorghum via Fermentation

Note that the User Input cell will highlight yellow when filled out correctly.

The "Selections" section (**Figure 10**) contains additional parameters such as the grid electricity source, carbon capture utilization and sequestration options and capture rate (when enabled), coal type used, and more. Selections consist of a Parameter name to describe what the specific selection applies to; a User Selection; and an Input Type that

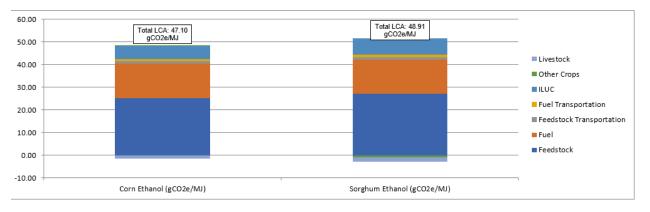
defines whether the input is a selection (i.e., a choice from a dropdown menu) or a numerical entry (described as "Value"). Hovering over the input value of a pink dropdown list selection will provide a comment description indicating which numerical option corresponds to each Needs Region. All pathways include a selection for the clean fuel production facility's Needs Region electricity source. Note that the California Needs Region is initially selected but users are directed to select the Needs Region to the region where the applicable facility is located.

Parameter	User Selection	Input Type
Needs Region Electricity Source	1	Selection
Enable/Disable Carbon Capture and Sequestration (CCS) for Grain Ethan	1	<ul> <li>Soloction</li> <li>1 - Bituminous, 2 - Subbituminous, 3 - I</li> </ul>
Coal Type: 1 - Bituminous, 2 - Subbituminous, 3 - Lignite	<del>ት</del> 1	Selection

Figure 10. Additional parameters for grid electricity, carbon capture use and sequestration, and coal types

When all user inputs are entered correctly, users can generate results using the "Generate LCA Results" button located at the top of the User Inputs section. Excel will run the calculations in the 45ZCF-GREET 2025 file and the GREET1\_2024 backend file to calculate the LCA results for the pathway. When results are calculated, one or more graph(s) will appear in the blue Results section, and the results table will be populated. The results graph and table are reported in g CO<sub>2</sub>e/MJ total dispensed fuel on an LHV basis.

The results graph shows the Total LCA Results as a text box at the top of the column that includes both direct lifecycle assessment (D-LCA) and Indirect Effects (**Figure 11**). Some stages can contribute substantially smaller impacts than others, making them difficult to view in the graph. In this case, we recommend a tabular view.



#### Figure 11. Graph of total LCA results

The Lifecycle GHG Results Table (**Figure 12**) breaks the results down by lifecycle stage – when more than one feedstock is combined in a mixed pathway, as in the calculations used to generate Figure 12, the results will be separated by feedstock. Each stage has an associated emissions value, in g CO<sub>2</sub>e/MJ. The D-LCA Results include direct and upstream (supply chain) emissions associated with producing a clean fuel. D-LCA results do not include market-mediated effects (referred to here as indirect effects), which are included in the separate indirect effects values. Within the D-LCA results, net emissions values are separated into categories that depend on the fuel of interest. For

most pathways, there will be Feedstock, Fuel and Transportation categories shown. For some pathways, Feedstock will be broken down by a "Original" and "Intermediate" feedstock category. "Original Feedstock" emissions include growing, harvesting, and processing original feedstock material (e.g., corn, soybeans). "Intermediate Feedstock" emissions include conversion of original feedstocks into intermediate feedstocks (e.g., soybean crushing and extraction to soybean oil). "Fuel" emissions include the conversion of intermediate feedstocks into finished fuel (e.g. soy oil conversion into RD and SAF via HEFA). Non-CO<sub>2</sub> emissions from fuel combustion - which are typically very small - are allocated to the "Fuel" category.<sup>23</sup> Each category has a dedicated transportation category (e.g., "Feedstock Transportation" and "Fuel Transportation") associated with transportation emissions during that lifecycle stage.

Life Cycle Stage	Corn Ethanol (gCO2e/MJ)	Sorghum Ethanol (gCO2e/MJ)
D-LCA	42.53	44.30
Feedstock	25.33	27.09
Fuel	15.15	15.15
Feedstock Transportation	1.02	1.02
Fuel Transportation	1.03	1.03
I-Effects		
ILUC	5.75	7.41
Other Crops	0.41	-0.81
Livestock	-1.58	-1.99
Total LCA Results	47.10	48.91
Fuel Production	500000 Gallons	500000 Gallons

Figure 12. The Lifecycle GHG Results Table after running the sample inputs for Ethanol from Corn and Sorghum via Fermentation

Note that UCO, tallow, and DCO do not have "Original Feedstock" emissions. For UCO and tallow, this is because 45ZCF-GREET does not assign any burdens to the production of these waste feedstocks. For DCO from dry mill ethanol plants, the marginal emissions associated with the oil extraction process are categorized within "Intermediate Feedstock".

For RNG, an "Avoided" category represents the GHG emissions credits from avoiding GHG emissions in the counterfactual scenario (see Table 8 for more details on counterfactual scenarios in 45ZCF-GREET).

In the "Hydrogen Production" pathway, users must enter their well-to-gate GHG result for hydrogen that is consistent with 45V regulations into the User Input section to calculate the "Gate-to-Wheels" GHG emissions (see section 2.4.3 for more details on requirements vis-à-vis 45V)—i.e., GHGs associated with transportation and use of the hydrogen as a transportation fuel. Results will be broken down by "Hydrogen Production" and subsequent stages related to hydrogen transport and vehicle refueling.

The Indirect Effects (I-Effects) include three sources of modeled GHG emissions (ILUC, Other Crops, and Livestock), as discussed in greater detail in section 2.5.4. These effects are included for pathways dedicated land for feedstock production (i.e., corn,

<sup>&</sup>lt;sup>23</sup> For all bio-based feedstocks, the biogenic CO<sub>2</sub> emitted during conversion and fuel combustion is assumed to be fully offset by the CO<sub>2</sub> sequestered in the biomass feedstock during its growth.

sorghum, soybeans, canola/rapeseed, and sugarcane). The D-LCA and I-Effects results are summed together to give the Total LCA Results for the pathway. Note that I-Effects are not included for corn stover, tallow, U.S. UCO, DCO, or selected intermediate crops (i.e., carinata, camelina, pennycress) as these feedstocks are not considered to have significant I-Effects in 45ZCF-GREET and the corresponding section of the results table will be blank. Additional purpose-grown feedstocks may be considered for inclusion future updates to 45ZCF-GREET, such as switchgrass, Miscanthus, willow, and poplar pending further assessment of their potential I-Effects.

### 3.3 Other Supporting Features and Information

45ZCF-GREET includes several other features to assist users. 45ZCF-GREET does include default values (Sample Inputs) *for the purposes of testing model functionality only.* These default values should not be used for the purposes of generating a user's lifecycle GHG emissions rate. Users can restore the scenario to the GREET defaults by clicking the "Reset Parameters" button located below the results table to return to the defaults for a selected pathway. Note that this feature also resets the results. If users wish to save their results, we recommend saving the results table to an external Excel file. Also, if the user switches from one 45ZCF-GREET pathway to another, the GREET defaults will be restored. A pop-up message will inform the user as the model quickly resets to defaults. Users should avoid interacting with Excel while 45ZCF-GREET is restoring the defaults. When the defaults are fully restored, the inputs for the selected pathway will become visible, and the user can begin editing the next pathway.

When the 45ZCF-GREET 2025 file is closed, the GREET1\_2024 file will automatically be closed as well. If users wish to save their results, we recommend saving the results table to an external Excel file. While the 45ZCF-GREET 2025 Excel file can be saved, it will restore to defaults for the selected pathway upon loading. Finally, users should NOT attempt to save the GREET1\_2024 Excel file after modeling. The GREET1\_2024 file is automatically closed without saving when the 45ZCF-GREET 2025 Excel file is closed to preserve the formulas and default data. If users accidentally save over the GREET1\_2024 file, they will need to replace it with the GREET1\_2024 file from the downloaded 45ZCF-GREET Package to restore default values and ensure accurate modeling.

For more information, visit: energy.gov/eere

May 2025



Office of Energy Efficiency and Renewable Energy