Message

From: Raburn, Janice [Janice.Raburn@bp.com]
Sent: 9/26/2018 6:44:54 PM
To: Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]
CC: Dominguez, Alexander [dominguez.alexander@epa.gov]
Subject: BP proposal
Attachments: 5 Year Ethanol Demand History.png; RFS Quarterly Compliance and CWC Proposal.pdf; RIN Market Tracking.pdf

Hello Mandy,

The BP team is looking forward to meeting with you on October 4. We will provide a BP perspective on how the RFS RIN market works.
In addition, we would like to present a proposal, briefly summarized below. Attached is supporting documentation – I may provide other documents in advance.

The proposal, in short:

BP continues to oppose the extension of the 1# waiver to E15, as we do not think EPA has legal authority to do so. If EPA moves forward with the 1# waiver rulemaking, we support EPA setting ethanol blending at no more than 10% (blendwall) in annual RVOs, Reset, and/or Set rulemakings. This would reduce RIN volatility, remedy small refiner RIN concerns, and eliminate the need for small refinery exemptions

We continue to hear that EPA may also propose a rule aimed at RIN transparency. BP supports RIN market transparency and liquidity but believes no major rulemaking is needed at this time. BP opposes limiting RIN transactions and market participants. EPA's sulfur and benzene credit programs work in this manner, and they have very limited liquidity and transparency. If EPA must propose such a rule, BP thinks quarterly compliance could possibly work. BP has a proposal (attached) on how to implement quarterly compliance; it includes a way to address the cellulosic waiver credit (CWC) so as to address the interests of both obligated parties and cellulosic RIN generators.

Best regards,
Janice

Janice K Raburn

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