

Message

From: Amelia Berger [amelia.berger@bracewell.com]
Sent: 8/13/2018 9:34:08 PM
To: Bolen, Brittany [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=31e872a691114372b5a6a88482a66e48-Bolen, Brit]
Subject: Help Protect Refiners Jobs from RFS Flaws In Reference to Docket ID No. EPA-HQ-OAR-2017-0091

Dear Brittany Bolen,

The time is now to help prevent a massive loss of good-paying American jobs. Refinery workers across the country are potentially at risk if U.S. independent refiners go out of business due to the skyrocketing costs associated with the Renewable Fuel Standard (RFS). The EPA currently implements the RFS in a way that makes all U.S. refiners responsible for ensuring that certain levels of renewable fuels are blended into gasoline, even if they do not have the capabilities to do such blending.

This nonsensical set-up gives large integrated oil companies that blend more fuel than they refine, coupled with big convenience store gasoline chains (who actually do much of the blending), a competitive market advantage. These companies gather valuable credits from the U.S. government for each gallon of renewable fuel they blend into gasoline produced by independent refiners, who do little or no blending themselves. Independent refiners are then forced to purchase those credits, often at astronomical prices, to comply with the RFS. These credits contributed to the bankruptcy of PES. Other refiners are at risk due to this backwards regulation, with 75,000 - 150,000 U.S. workers potentially impacted.

Finally, EPA should reduce the renewable fuel volumes to a level all engines and infrastructure can handle, which will help reduce the cost to refiners.

Please help save our jobs and make this right. We ask that you take action to reduce the renewable fuel volumes and address the dysfunctional RFS credit system in a way that fixes this inequity and preserves the viability of America's refining sector.

Thank you.

Sincerely,
Amelia Berger
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