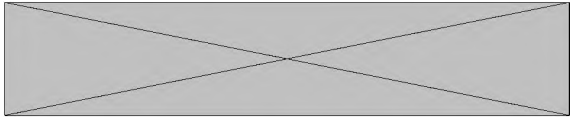


To: leila_getto@ios.doi.gov[leila_getto@ios.doi.gov]
From: Mike Sommers, API
Sent: 2019-03-06T09:28:13-05:00
Importance: Normal
Subject: EPA's Proposed RIN Reform Needs A Closer Look
Received: 2019-03-06T09:29:22-05:00

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March 6, 2019

Dear Leila,

On Monday, EPA sent its proposal to reform a key component of the [Renewable Fuel Standard \(RFS\)](#) to the White House for review. Unfortunately, a [recently released study](#) is the latest in a string of evidence that shows the proposal would only worsen the already broken RFS.

In short: the EPA proposal to reform the market for Renewable Identification Numbers (RINs) under the RFS misdiagnoses the problem with the RINs market and provides misguided and counterproductive changes. Contrary to recent EPA commentary, the study finds that RIN price volatility has been the result of the ethanol blend wall as well as EPA's implementation of the program – where EPA regulatory actions, and events that foretell how EPA will set standards, have resulted in RIN price swings.

Unless the [ethanol blend wall](#) is addressed by reducing RFS standards volumes to feasible levels, fundamental structural problems with the RFS – a key factor that influences RIN price and RIN volatility – will remain. In fact, restricting the RIN market, as proposed by EPA, will exacerbate the already [broken fuels mandate](#) which is costly and [unnecessary for U.S. consumers](#). Underpinning these findings is [EPA's own previous report](#) showing that refined products reflect the cost of obtaining RINs.

The structural changes under consideration are likely to do more harm than good.

EPA's attention should be focused on protecting consumers and finding long-term solutions for a program built on an outdated premise, not picking and choosing parts to fix. As the administration evaluates EPA's proposed rulemaking for year-round E15 gasoline sales and biofuels credits reform, it is critical that these anti-consumer policies are given a second look.

Sincerely,

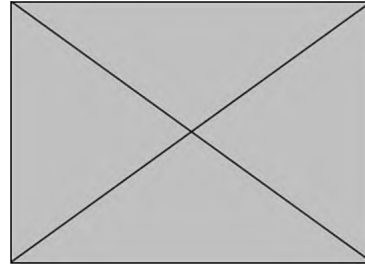


Mike Sommers
President & CEO
API

**The Growing Good-News Story on U.S.
Natural Gas**

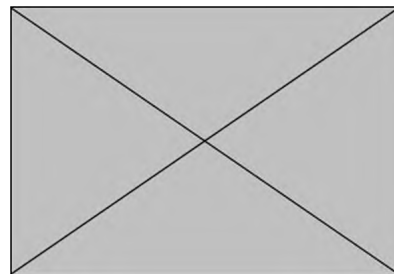
There's every reason to believe U.S. natural

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API is the only national trade association representing all facets of the oil and natural gas industry, which supports 10.3 million U.S. jobs and nearly 8 percent of the U.S. economy. API's more than 600 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 40 million Americans.

To learn more about API and the value of oil and natural gas, please visit [API.org](#).

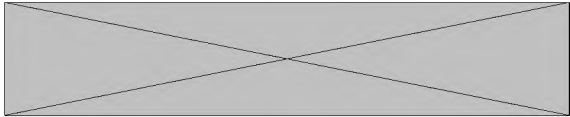
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200 Massachusetts Ave NW
Washington, DC 20001
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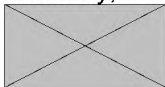
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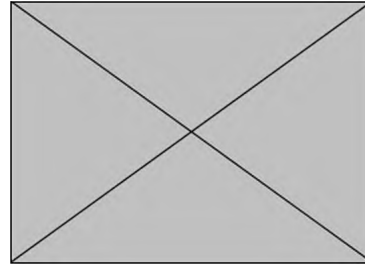


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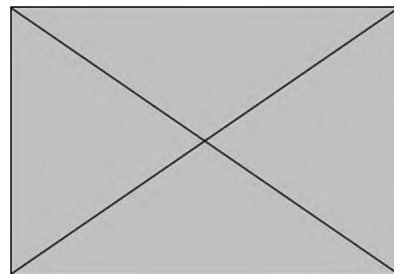
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