

To: Dravis, Samantha[dravis.samantha@epa.gov]
Cc: Irving, Verna[Irving.Verna@epa.gov]
From: Columbus, R. Timothy
Sent: Thur 4/13/2017 3:37:31 PM
Subject: Request for Meeting regarding "Obligated Party"

Dear Ms. Dravis,

On behalf of our clients, the National Association of Convenience Stores (NACS) and the Society of Independent Gasoline Marketers of America (SIGMA), I request the opportunity to meet with you, and anyone else you deem appropriate, to explain NACS' and SIGMA's adamant opposition to a change in the "point of obligation" within the RFS. The members of SIGMA and NACS represent over 80% of the retail sales of motor fuels in the United States. It is their conviction that a change in the point of obligation, as requested by petitions currently before EPA, would generate significant anti-competitive consequences, dramatically increase the complexity of the program and its enforcement, and result in a reduction of the volumes of renewable fuels blended into the U.S. fuels markets. Moreover, they believe that a number of the factual assertions upon which petitioners have supported their request are demonstrably erroneous. Consequently, we believe it is important to meet with you as you go forward with your evaluation of this issue.

Thank you for your courtesy. I can be reached at 202-429-6222 and look forward to hearing from you as soon as possible.

All the best