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From: Barfield, Blake
Sent: Mon 4/3/2017 5:31:34 PM
Subject: RFS resources as follow-up
[IHS Study - Obligated Party Lists.pdf](#)
[Valero-OPIS-Analysis-of-Number-of-Rack-Sellers-June-2016.pdf](#)
[Letter-from-OPIS-to-EPA-February-21-2017.pdf](#)
[Holcomb's Economic Analysis.pdf](#)

Ken:

Thanks again for meeting last week. I thought it would be helpful to provide a few resources following our meeting which are important parts of the docket to call out. Specifically, these demonstrate the universe of “Rack Sellers” would be similar in size to what EPA currently manages for Obligated Parties.

Understanding schedules are challenged, our General Counsel, Denise McWatters, and I would be glad to meet with you all and discuss this on 4/12 or 4/13 if you have time.

- IHS Obligated Party Lists – this shows potential universe of obligated parties in various scenarios
 - o This work identified 181 parties should EPA make obligation rest at Rack Sellers (p. 4)
- Valero Master List of Rack Sellers
 - o Identified 202 Rack Sellers (did not consolidate for Joint Ventures and subsidiaries)
- A letter from Oil Price Information Service (OPIS) to EPA placed in the docket regarding the proposed denial.
 - o OPIS is a widely used industry data provider – this letter was a response to the prior EPA administration’s mischaracterization of OPIS work on the subject, including the April 2016 study done to evaluate the universe of obligated parties should it move to ‘rack sellers’
- Alex Holcomb’s study regarding the impact to union employment at refiners because of the burden of RIN compliance costs
 - o Discusses that the RIN is not passed through in refining margins

- o Limited pass-through of the RIN imposes economic hardship on refiners, placing jobs at risk (pp. 15-16 is the core piece)

Thanks

Blake

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