

Gina Grey, Vice President, Fuels, Climate Policy, NW/SW Regions

Mr. Jim Aguila
Manager, Substance Evaluation Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814
Via electronic mail to jaguila@arb.ca.gov

May 8, 2014

Dear Mr. Aguila:

Re: WSPA Comments on CARB's April 17 Workshop on the Commercialization of New Alternative Diesel Fuels/Proposed Alternative Diesel Fuels (ADF) Regulation

The Western States Petroleum Association (WSPA) appreciates the opportunity to provide ARB with our thoughts on the currently proposed ADF regulation. WSPA is a non-profit trade association representing twenty-seven companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other states.

While we reserve the ability to make more detailed comments when we see next round of regulatory proposals and, more importantly, the actual regulatory language, we do have two brief comments below from the April 17th workshop.

Effective Blend Level

WSPA wants to support the idea that the statewide Effective Blend Level should include fuel and mitigation from the two air districts subject to mitigation, and that the reporting for those districts could be simplified if safe harbor fuel never has to be reported.

U.C. Riverside Study

The timeframe for completing the U.C. Riverside study and peer-reviewing the results is inconsistent with staff's proposed timetable for the rulemaking.

We think ARB should not include the current biodiesel study in this regulation, or alternatively, ARB should delay the regulation's adoption hearing until the study is completed and reviewed by the stakeholders before moving forward with adoption activities.

WSPA looks forward to seeing the regulatory language and participating in further discussion and evaluation of the proposed commercialization of alternative diesel fuels. Please let me know if you have any questions.

Sincerely,

Gina Grey

c.c. Lex Mitchell, ARB