

PetroCard, Inc.

PetroCard asserts that the Program Fee should be distributed proportionally by obligated gallon rather than an even distribution of the fee over a count of registered deficit or credit generator participants. As currently proposed, with 95% of the total 2023 fee divided by the number of registered deficit generator participants, the distribution of fees will inequitably impact smaller distributors who would pay the same amount as much larger suppliers, regardless of gallons supplied. As proposed, the CFS Participation Fee would be assigned at the entity level without regard to the entity's total carbon emission activities. This is not in line with the high-level logic of the CFS, which is to apply the detriment to the (carbon-intense) fuel gallon. A gallon proportional distribution of the fees would ensure an equitable impact in line with the aim of the CFS program.