

Phillips 66 (Marc Ventura) Anonymous Anonymous

operates a petroleum refinery in Washington State, as well as fuel terminals, and supplies fuels throughout the state as well as other western states. Philips 66, is a member of the Western State Petroleum Association, sometimes called WSPA, and we will be submitting comments through WSPA by the deadline.

WSPA has already submitted a number of written comments through the prior workshops last year. We are encouraging Ecology to seriously consider the comments that has been submitted as well as the new comments that we'll be submitting. And they will be consistent with prior comments, so we hope that consider that and update the proposed regulation to make it a more practical system and reporting system. As well as a fairer system.

For instance, there are a number of biased positions in the CFS. Where you would, for instance, make correction in the program and adjust deficits or increase deficits if it's appropriate. But you would not adjust the credits if they're credits would be adjusted. So, that's just a simple example, but the program should be fair if you make a correction one way, you should do it the other way as well.

So again, be on the lookout for those written comments, and feel free to reach out to WSPA as an organization or to Philips 66 if you have specific question about those comments. Thank you.