Ryan Escamilla

Comment on the Proposed 15-Day Amendments to the Mandatory Reporting of Greenhouse Gas Emissions (MRR) Regulation:

I urge CARB to reconsider these MRR amendments, which are designed to support the broader Cap-and-Invest program changes. While I support California's climate goals, now is not the time to impose additional regulatory burdens that will raise costs for the state's remaining refineries and California drivers.

* Record-high gas prices already burden families: California's average price is currently over $6.00 per gallon — nearly $1.70 above the national average. Working families, small businesses, and low-income households in Huntington Beach and across the state are struggling with these costs. Further compliance expenses passed through from refineries will only make this worse.

* Refining capacity is collapsing: California has already lost nearly 20% of its in-state refining capacity in the past year due to the closures of the Phillips 66 Los Angeles and Valero Benicia refineries. These MRR changes help enforce tighter Cap-and-Invest rules that industry warns will accelerate more closures, increasing our dangerous reliance on imported fuels and exposing us to greater price volatility and supply risks.

* New reporting requirements add real costs without immediate climate benefit: The expanded data demands (LPG importers, cement product data, electricity retail sales, etc.) will raise administrative and compliance expenses for fuel suppliers and facilities already operating under some of the strictest rules in the nation. These costs ultimately flow to consumers at the pump.

* Energy security and affordability must come first: With global tensions driving oil prices higher and California already importing far more fuel than before, we should prioritize keeping our remaining refineries viable rather than layering on new requirements that could drive the industry toward zero in-state capacity.

California families cannot afford another round of price increases. I respectfully ask CARB to pause or significantly scale back these amendments until refinery stability and consumer affordability are secured.

Thank you for considering this input.