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VIA ELECTRONIC POSTING

Public Docket | Proposed Amendments to the California Reformulated Gasoline Regulations
<https://carb.commentinput.com/?id=4sTAbd8UM>

September 14, 2026

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento CA, 95814

Re: Kern Energy Comments on Proposed Amendments to the California Reformulated Gasoline Regulations

Dear Sir or Madam:

Kern Energy (Kern) is providing comments on the California Air Resources Board's (CARB) July 28, 2026, Proposed Amendments to the California Reformulated Gasoline Regulations (CaRFG) rulemaking package, in which CARB is proposing to amend the CaRFG regulations to support the voluntary sale of gasoline blends containing up to 15 percent ethanol (E15). CARB has also incorporated amendments that would clean up the regulation by removing outdated and/or obsolete sections. Kern is specifically commenting in support of (1) the flexible options to produce E15 and (2) simplifying the regulation by removing obsolete sections and defining terms not previously defined.

Kern operates a 27,000 barrel per day refinery located in California's San Joaquin Valley that has been in continuous operation for more than 90 years. A family-owned and operated company employing approximately 200 people, Kern plays an important role in leveling the supply and price playing field for petroleum products in the region, supplying critical transportation fuels to agricultural operations, major transportation corridors, local industry, and the general public. Kern is now the last small refinery left producing gasoline and diesel in California, and the only refinery located between the major complexes in Los Angeles and the Bay Area.

1. Flexible Options Simplify the Ability to Produce E10 and/or E15

Kern broadly supports the array of options in Staff's proposal for producing E15, in addition to maintaining existing standards for producing gasoline blends with up to 10 percent

ethanol (E10). Specifically, Kern recognizes the flexibility afforded in being able to produce E15 by blending ethanol into a batch of California Reformulated Blendstock for Oxygenate Blending (CARBOB), an existing batch of E10 gasoline, or by blending E10 with gasoline containing up to 85 percent ethanol (E85). Facilities may be able to implement unique blending strategies to increase the ethanol content without the need for installing duplicate infrastructure specifically dedicated to E15 production. Kern also appreciates the optionality within this proposal to produce E10, E15 or both, maintaining a broad suite of fuel options Kern's customers can select to meet the unique and evolving needs of retail consumers.

2. Removing Obsolete and Outdated Regulatory References Streamlines the Regulation

Kern appreciates Staff's proposal to cleanup the regulation by removing obsolete sections and improving definitions. Kern acknowledges Staff's change of "qualifying small refiner" to "small refiner," due to the limiting nature of the term and alignment with the current landscape of refiners in the state. Additionally, Kern appreciates the clarification provided by defining the terms "cap limit" and "flat limit" in Section 2260.

Kern encourages Staff to further examine the cleanup to test methods detailed in Table 1 of Section 2263(b)(1), specifically to allow for use of updated versions of ASTM standards. This could be done by incorporating a notation approving use of the listed or later version, so regulated parties have options.

Kern recognizes the complexity in deleting entire regulatory sections and ensuring all cross references are maintained. Kern encourages Staff to review newly numbered paragraph 2262.6(b)(2) and determine if the text should read "Starting July 1, 2004, no person...all of the oxygenates identified in section (b)(3), other than oxygenates not prohibited by section (b)(1)."

Kern appreciates CARB's consideration of the comments provided. As always, Kern is committed to working with Staff throughout this regulatory process. Please do not hesitate to reach out to Janea' Roberts, External Affairs Director, at (661) 845-0761 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda Palmer". The signature is fluid and cursive, with the first name "Melinda" and last name "Palmer" clearly distinguishable.

Melinda Palmer

VP – Regulatory & Public Affairs, Kern Energy