



**Western States Petroleum Association**  
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**Thomas A. Umenhofer, CCM, REPA**  
Vice President

September 28, 2016

Mr. Sam Wade  
Branch Chief  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

sent via email: [samuel.wade@arb.ca.gov](mailto:samuel.wade@arb.ca.gov)

Re: WSPA Initial Comments on Biofuel Supply Module v0.83 BETA

Dear Sam,

The Western States Petroleum Association (WSPA) is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states. WSPA appreciates this initial opportunity to provide feedback on the California Air Resources Board (ARB) Biofuel Supply Module v0.83 BETA presented at the ARB Scoping Plan Update - Transportation Sector Workshop, held on September 14, 2016 in Sacramento, CA. WSPA is providing these comments as part of a continuous effort to provide feedback on the LCFS-related items presented by ARB.

It appears that the new Biofuel Supply Module (BFSM) will have a significant role as an analytical tool for the Scoping Plan update and potentially for the Illustrative Compliance Scenario update which will be developed for the 2017 mid-term review for LCFS. It is our understanding that BFSM was developed internally by ARB staff, based on existing literature, staff experience, and input from E3 (specifically with regard to the interface with the E3 PATHWAYS Model). Further, we understand that ARB's release of this "beta version" was to serve as an analytical framework and starting point for dialogue with and feedback from stakeholders.

With this ARB intent in mind, WSPA would like to emphasize that independent review and comment (external to ARB) of the BFSM is critical to a transparent model validation process. We welcome ARB's request for input from stakeholders but would like to see a clear process for such input to be provided, considered, and incorporated (as appropriate). To ensure for model development transparency and meaningful stakeholder input, WSPA requests that ARB complete the following tasks:

- Identify a timeline for receiving stakeholder feedback.
- Provide timely responses to stakeholder comments and questions.
- Provide access to the module details and technical documentation
- Provide summary of expected model input data sources.
- Complete an independent 3<sup>rd</sup>-party peer review of BFSM.

In completing these tasks, ARB will have established a technical framework and resource base for stakeholders to assess BFSM while concurrently having an independent 3<sup>rd</sup>-party evaluation for use by both agency and stakeholders in the future.

WSPA appreciates this opportunity to provide our initial thoughts to this important LCFS economic model element. We look forward to an open and timely stakeholder review of BFSM. If you have any questions, please contact me at (805) 701-9142 or via e-mail at [tom@wspa.org](mailto:tom@wspa.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Wade", with a stylized flourish at the end.

cc: Catherine Reheis-Boyd - WSPA