



INTERNATIONAL BROTHERHOOD of ELECTRICAL WORKERS

June 19, 2015

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

Re: Alon's Bakersfield Refinery

On behalf of the entire membership of IBEW Local 428, I would like to extend our strong support of the Low Carbon Fuel Standard's provisions for Low Complexity—Low Energy Use Refiners. Clearly, not all refiners are the same, and these provisions recognize that. Both the Air Resources Board and U.S. Environmental Protection Agency have long recognized in their regulatory programs the unique space small refiners occupy in the oil and gas industry. This distinction is a very necessary and positive step.

Unfortunately, it seems the proposed final regulatory provisions for the re-adoption of California's Low Carbon Fuel Standard (15-day changes) fails to recognize Alon's Bakersfield Refinery as a low carbon fuel producer, even though it is configured and engineered to produce low CI base fuels. This is a huge mistake, especially in light of the fact that staff had every opportunity to make the LCFS's LCLE provisions work for ALL low carbon intensity refineries in California, instead deciding against the several compromise proposals presented.

It is for these reasons that IBEW Local 428 strongly urges the Board to direct staff to revisit this issue at the earliest opportunity.

Sincerely,

A handwritten signature in blue ink that reads "James S. Elrod".

James S. Elrod
Business Manager/ Financial Secretary

