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September 4, 2014

Shaun Donovan, Director
The Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Re: Final Volumes for the 2014 Renewable Fuel Standard

Dear Director Donovan,

API has urged the U.S. Environmental Protection Agency to expeditiously finalize Renewable Fuel Standard requirements that reflect the realities of the ethanol blend wall, and protect the U.S. economy and consumers by setting the mandate below the equivalent of 9.7 volume percent ethanol in the gasoline pool. This rule is now under review by your office and API member company executives representing the downstream segment of our industry respectfully request a meeting with you to discuss how this rule could impact our ability to supply transportation fuels.

EPA has taken an important first step by proposing to exercise its waiver authority, which is necessary to provide a clear signal to the market for 2014 and beyond that EPA will take appropriate action to avert the ethanol blend wall and its potential ramifications on U.S. consumers, domestic product supply availability, and the economy. In the final rule, the Administration must recognize these market realities and invoke its waiver authority as proposed.

The 2014 Final Rule is once again being issued very late and will once again be applied retroactively. This rule is likely to be released with less than one quarter of the year remaining. The ramifications of setting an annual standard that fails to take full account of the vehicle, fuel, and infrastructure issues could be significant, as companies are left with no opportunity to change what has been done for the first three-quarters of the year.

API has also requested a meeting with our respective technical staff to discuss the finer details of this rule and we look forward to that discussion as well.

Sincerely,

A handwritten signature in black ink that reads "Jack Gerard". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jack N. Gerard
President & CEO

cc: Gina McCarthy, Jeffrey Zients, Howard Shelanski, John Podesta