From:	WIND Cory Ann
To:	GARRAHAN Paul; WIND Cory Ann; COLLIER David; HNIDEY Emil
Cc:	ELBEL Elizabeth
Subject:	RE: CFP Corrections Rulemaking - draft fiscal statement
Date:	Tuesday, May 24, 2016 3:53:23 PM

Thanks, Paul. I agree with your assessment about the negative impact to the credit generators, but feel that it'll just be a slight decrease since we can't forecast what the price of those credits might be.

Cory-Ann Wind
Oregon Clean Fuels Program
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From: Garrahan Paul [mailto:paul.garrahan@state.or.us]
Sent: Tuesday, May 24, 2016 2:28 PM
To: WIND Cory Ann; COLLIER David; HNIDEY Emil
Cc: ELBEL Elizabeth
Subject: RE: CFP Corrections Rulemaking - draft fiscal statement

Cory: Attached are my proposed edits to the draft FIS. In particular, I recommend that you add comments about the economic impact of the rules on credit generators. Don't you think it will decrease their revenues, since they will each generate more credits and regulated parties will need fewer credits? Otherwise, it looked fine to me.

Also, I recommend that you amend the staff report to delete all references to adopting the rules as temporary rules and to delete the finding that adopting the rules is necessary to avoid serious prejudice to the interests of the public or affected parties (and the supporting discussion of that finding in the staff report). I have not prepare a redline, but would be happy to do that if necessary. Otherwise, I think the staff report is fine.

Paul Garrahan
Oregon Department of Justice
971.673.1943 (Tue, Thu, Fri) (Portland)
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503.929.7553 (Mobile)

From: WIND Cory Ann [mailto:cory.ann.wind@state.or.us]
Sent: Tuesday, May 24, 2016 2:05 PM
To: COLLIER David; HNIDEY Emil; GARRAHAN Paul
Cc: WIND Cory Ann; ELBEL Elizabeth
Subject: CFP Corrections Rulemaking - draft fiscal statement
Importance: High

David and Emil, here is the draft fiscal statement. Paul, its attached for

your review. I've also attached the staff report for the temporary rulemaking for reference. I am not making any additional changes for this permanent action.

I was hoping to get this out by COB tomorrow but I know I haven't given you much time to review it. I'll be in Bend for a meeting on Thursday but will have access to a computer so I can send it out then. Or I might have to have Elizabeth send it out on Friday. The fiscal advisory committee meeting is scheduled for Wednesday, June 1st from 9 – 10 am.

Let me know if you have any questions.

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