From:	PETERS Bill N.
To:	"Soni, Arpit@ARB"
Cc:	Baral, Anil@ARB; Singh, Manisha@ARB; WIND Cory Ann
Subject:	RE: WSPA comments on temperature corrections
Date:	Wednesday, August 01, 2018 09:22:35

Arpit,

Thanks very much for the quick and thorough response. I don't think we're going to take it out -- their only real suggestion in conversation was to exempt financial-grade meters from the temperature correction requirements. Our next step is going out to public notice on our narrow rulemaking (GREET 3.0/Forklifts+TRUs/some housekeeping fixes), so we may just float that as an option to take comment on.

I agree they should be doing this already, though given some of the reporting issues we've run into… I'm more skeptical than I used to be that all of the companies take proper care with the data, even when it's financially sensitive.

My best,
--Bill

Bill Peters
Clean Fuels Program Analyst
Oregon Department of Environmental Quality
t. 503 229 6901

From: Soni, Arpit@ARB <Arpit.Soni@arb.ca.gov>
Sent: Tuesday, July 31, 2018 11:21 PM
To: Bill.N.PETERS@state.or.us
Cc: Baral, Anil@ARB <Anil.Baral@arb.ca.gov>; Singh, Manisha@ARB <Manisha.Singh@arb.ca.gov>
Subject: RE: WSPA comments on temperature corrections

Bill,

I don't see this being raised in any of their formal rulemaking comments.
https://www.arb.ca.gov/lispub/comm/bccommlog.php?listname=lcfs18

We have been talking about this change for a long time (more than a year now) and I went back to check if they said anything during the informal process, but found nothing. Anyway, we borrowed the language from the RFS which means fuel providers generating RINs are already subject to these temp correction requirements. We are keeping this change.

Also, the argument they are making doesn't seem very valid or make much sense (don't require us to do the thing which we are probably already doing because we don't understand how our instruments work and we will get confused?!). My understanding is fuel contracts generally require transacted volumes to be temp adjusted (as they mention) so this should be an industry standard practice. If anything they should suggest if this aligns with the industry standard or else how it can be

better aligned.

Let us know if we can help more on this.

Arpit

From: Baral, Anil@ARB
Sent: Tuesday, July 31, 2018 2:26 PM
To: Soni, Arpit@ARB <Arpit.Soni@arb.ca.gov>
Cc: Bill.N.PETERS@state.or.us
Subject: FW: WSPA comments on temperature corrections

Arpit,
Can you respond to this?

Anil Baral

From: PETERS Bill N. <Bill.N.PETERS@state.or.us>
Sent: Tuesday, July 31, 2018 2:24 PM
To: Baral, Anil@ARB <Anil.Baral@arb.ca.gov>
Subject: WSPA comments on temperature corrections

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Anil,

So here's that email you asked me to send – I'm attaching the WSPA comments (which they forgot to take the draft/privileged tag off of when they submitted to us) which have the bit about temperature corrections on pages 2 and 3. The discussion draft of our rules are basically identical to yours on this bit and I wasn't really expecting this to be the thing they'd have an issue with, so I'm just seeing if (1) they've raised this with you and (2) if so, are you making any changes?

My best,
--Bill

Bill Peters
Clean Fuels Program Analyst
Oregon Department of Environmental Quality
t. 503 229 6901