From:	GARRAHAN Paul
To:	PETERS Bill N.
Cc:	WIND Cory Ann
Subject:	RE: CFP 2018 rules package for review
Date:	Saturday, October 13, 2018 15:09:25
Attachments:	JUSTICE-#9223898-v1-CFP2018_rule_amendments_garrahan_redline.docx

Attached are my proposed edits, comments and questions, in redline. Please let me know when you would like to discuss. Now on to the staff report…

Paul Garrahan
Oregon Department of Justice
503.947.4593 (Direct)
503.929.7553 (Mobile)

From: PETERS Bill N. [mailto:Bill.N.PETERS@state.or.us]
Sent: Wednesday, October 10, 2018 5:18 PM
To: GARRAHAN Paul
Cc: WIND Cory Ann
Subject: CFP 2018 rules package for review

Hi Paul,

As you anticipated the other day, it's that time of year again for reviewing our rule package before it goes to the EQC next month. Attached are the draft final rules – I'll be sending you the draft Staff Report tonight or tomorrow. Cory-Ann's in Hawai'i until Tuesday but checking email. She can correct me, but I believe I'm supposed to ask you to please review these by COB next Monday.

Please email or give me a call if you have any questions, we generally did a bunch of little things in this rule package.

One area that came up in the comments from WSPA that may be worth double-checking is OAR 340-253-1010 (4) Fuels that are exported from Oregon. Basically there are situations where fuel comes into the state, credits or deficits are generated form that fuel, and then it's later exported by that same party or someone else. In those cases where the credits and deficits have already been generated, the CFP Online System will generate the inverse instrument on export – if it generated credits coming in, it'll generate deficits going out, and vice versa. I think the current draft basically says that, but I'd appreciate you making sure it does.

My best,
--Bill

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

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