

DOCKETED

Docket Number:	15-OIR-02
Project Title:	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
TN #:	204705-18
Document Title:	RTC Fuels, LLC (Pearson Fuels) Response to 3103 Regulation Questions
Description:	N/A
Filer:	Patty Paul
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	5/22/2015 3:59:31 PM
Docketed Date:	5/22/2015

ARFVTP: 3103 Regulation Response Form

**RTC Fuels, LLC
Grant Award ARV-12-015
19 E-85 Retail Sites**

1. What are the possible impacts for your project with the credit discount provision and the timeframe for when you expect to generate credits.

RTC Fuels, LLC (Pearson Fuels) has no ownership of any of the completed retail E85 facilities. We are using the CEC funds to get the facilities built into existing retail gas stations that are owned by other companies.

We will not own fuel at any of the facilities. There are no RINS or LCFS credits generated at the facilities. There is no fuel produced at any of these facilities, it is only distributed through them.

Before construction began on any of these facilities, Pearson Fuels distributed to almost 50 E85 sites around the state. As a result of that distribution business, that has been in place long before the grant, Pearson does obtain LCFS credits and RINS, much of the value of which is passed on to the buyers of our fuel. When these stations are all built and we supply fuel to them that will continue to be the case.

2. We would also like to provide you the opportunity to provide a statement for our record.

While Pearson has opted in to both the LCFS and the RFS programs and we own, trade, purchase and sell both LCFS credits and RINS, for the reasons described above it is our position that the provisions of Regulation 3103 should not apply to us for this project.

Mike Lewis
Managing Member
RTC Fuels, LLC