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Project Title:	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
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ARFVTP: 3103 Regulation Response Form

**RTC Fuels, LLC
Grant Award ARV-10-008
BioDiesel Blending Facilities**

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 either of these completed biodiesel facilities. We used the CEC funds to get the facilities built into existing diesel facilities that were owned by other companies.

We do not provide fuel to either facility or own fuel at either facility. We do not generate any LCFS credits or RINS as a result of helping to develop these facilities.

There is no fuel produced at either of these facilities, it is only distributed through them.

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 and RINs, none of this is done as a result of, or through these projects. Therefore, 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