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Comments on Docket Number 23-OIR-03

Additional submitted attachment is included below.



Member of California Grain & Feed Dealers Assn.

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To Whom It May Concern:

I am Paul Cramer, Vice President of our family business, Star Milling Company in Perris, California. Star Milling is a small company of 90 employees. The business specializes in manufacturing and distributing farm, pet, and domestic animal food. We distribute across the state, nation, and world. Affordable fuel is critical to our business. We need fuel for the machinery and equipment we use to produce feed. But our business also relies on the fleet of trucks and delivery vehicles that ensure our products are delivered on time. I am also actively involved in the California Farm Bureau and the National Federation of Independent Business, as well as other local small business and community causes. I know this regulation will have an impact on many, if not most, of the members of those organizations.

I only learned about the CEC's emergency rule regarding spot-market fuel reporting this weekend. I do not think I or other market participants have had enough time to learn what is in the regulation, consider what impact it might have, and provide our input to the CEC. Does this regulation really need to be on the books right now? Can't we slow things down a bit?

The regulation looks like it is going to raise fuel prices, not lower them. Given the importance of fuel to my business, I appreciate that CEC is trying to keep prices down. But it seems to me that the regulation is going to decrease the supply of fuel, which will only raise prices. I can tell you that when the supply goes down, the price goes up. We only have a handful of refineries here in California. If we drive out other suppliers (like importers), I have to think supply is going to go down. The regulation looks like it will drive out suppliers because it is going to make selling fuel in California more expensive and more complicated. There are other markets for fuel and I am worried that lots of companies are going to take their business elsewhere. We need it here. Please reconsider.

Respectfully,

Paul Cramer Vice President