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American Petroleum & Convenience Store Association

APCA is a small business organization that proudly serves more than 2000 gas stations and convenience stores and employs an upwards of 15,000 hard working men and women in our state.

That is why we are asking you to please seriously consider pausing the spot market emergency regulations in SB X1-2 and give these rules the deliberate, democratic and thorough evaluation and public discussion that they deserve.

Independent gas stations, the small businesses our organization proudly serves, will be among the hardest hit should you enact these rules the way they are currently written. Branded gas stations have contracts with refineries. When the market is tight, branded gas stations will have gas but independent gas stations are not as fortunate. They must rely on importers and resellers. These regulations will seriously hurt importers and resellers, which will limit supply for independent gas stations.

That means our small business owners, many of them ethnic and veteran-owned business owners already on the ropes as we emerge from the pandemic, will be faced with more certainty and the very strong likelihood they'II need to lay people off, scale back their services, or close their doors altogether.

In cities across California higher fuel prices means higher cost of goods, services and other inventory that our citizens rely on. Not luxury items, health care supplies and goods, school and supplies for their kids, food on the table and their ability to pay rent or mortgage.

The CEC itself has pointed to key factors attributed to gas price spikes including: CA's isolated refinery market, environmental program costs, and taxes, and yet these rules do nothing to address these factors.

Please don't rush these rules through which will do irreparable damage to scores of small business owners, working families and communities. With something as important and costly as this , impacting so many Californians, we all deserve better.

We recognize and support the concerns raised by the labor groups in the workshop.

Thank you.