



WSPA Comments on CEC's

Overall, it's apparent that CEC staff has applied substantial effort in order to incorporate WSPA's prior comments and improve the package. WSPA appreciates this effort by staff, and now believes things are better defined, documented, and finalized in a very user-friendly format.

General

- Ensure that the instructions for each report address the type of data being requested in the order that they appear on the report form. For example, on W08 and M08, the description about "Production" should appear before the description for "Total Product Received".
- Ensure that the instructions contain a description of "Company Name" and "Company ID #" on all forms. Lacking on W800.
- The first part of the sulfur descriptor for CARB and EPA diesel should show less than or equal to 500ppm, and for CARB and EPA Highway ULSD diesel, should be less than or equal 15ppm (W800, M08, M782B both pgs, M810, and A15).

W900:

- Specific to the W900 form (weekly DTW), the CEC did not make substantive changes to the form based upon our (WSPA) April 26, 2004 comments. There are a few clarifying changes to the instructions (defined "High Price" and "Low Price") but we would like to go on record again with our earlier comments relative to the W900 report that question the need and relevance of this weekly report.
- The interim W900 report only requires data from companies "that had wholesale transactions for gasoline delivered to final destination at 25 or more locations per geographic region. No report is required for a particular region if there were 24 or fewer deliveries for the reporting period." Is this "less than 25 sites" filter being removed?
- Is it necessary to report the number of sites for each grade in each region?

A15

- Should add additional clarification that the primary operator of the station is required to complete the report annually, both in the instructions for the form and in the "Table of Reports" page.

M13

- Do not delete the word REPORT in the title of the instructions page.
- Add a description for "Refinery ID #".

M700

- Need a description for destination port.

M782B

- The last paragraph under "Reporting of Propane Sales" addresses the category "Sales to Other End-Users". Cannot find this category on the report form.
- Need to add a description for "Wholesale Sales" types.
- Under "Reporting of Distillate Sales", in line 5 of the second paragraph, "Governmental" should not be capitalized.

A06

- Paragraph 1, line 2: delete "for" after "This".