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House of Representatives
Commonwealth of Pennsylvania
Harrisburg

February 3, 2022

RE: Docket ID No. EPA-HQ-OAR-2021-0324.

Dear Administrator Regan:

As the Democratic Leader in the Pennsylvania House of Representatives, I appreciate the opportunity to offer my comments in connection with EPA's proposed rule - "Renewable Fuel Standard ("RFS") Program: RFS Annual Rules."

First, I appreciate this administration's commitment to safeguarding our environment in these truly unprecedented times. The RFS is a noble program that is important to managing the challenges of climate change – challenges that are becoming more and more apparent with each passing year. However, the compliance credit market created by the program has been malfunctioning for years, and as a result, independent refiners like those in the Northeast are suffering. The EPA's recently-proposed RFS volumes have the potential to make matters worse, and without meaningful changes, could push these refiners into closing their doors permanently. This would have serious implications for Pennsylvania and our nation. As a legislative leader who cares deeply about quality job opportunities in my state, this causes me concern, particularly now when so many families continue to face hardships directly related to the ongoing pandemic.

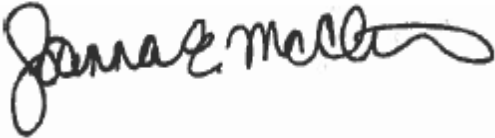
Refineries like Monroe Energy in Southeastern Pennsylvania provide family-sustaining job opportunities not only for the people they directly employ, but for thousands more who indirectly benefit from these facilities. According to a 2011 Pennsylvania Department of Labor study, refinery jobs in Southeastern Pennsylvania have one of the highest job multipliers of any industry in the United States. This study highlighted just how important Monroe is to our Commonwealth, and how many families depend on a facility like Monroe, directly and indirectly, for their livelihood. Moreover, Monroe has maintained nearly 500 full-time employees, and they also support hundreds of contractors, the vast majority of whom are union members from local building trades. These are jobs that pay good wages and offer real benefits and a chance to retire with fiscal security.

It is also important to note that in addition to producing the vital transportation fuels that help propel our economy and on which we all rely, refiners like Monroe also produce critical home heating oil that many in the Commonwealth depend on. At a time when energy prices continue to rise, I am concerned that many residents are simply not in a position to absorb additional home energy costs should these facilities close, especially in light of the new realities of this COVID-19 economy.

There are ways in which EPA can stay true to the RFS program's intent and environmental goals without simultaneously jeopardizing the viability of independent refiners like Monroe. This is especially important considering the role that independent refiners must play in the coming green energy future. Beginning with the proposed RFS volumes, the EPA should consider reducing the overall 2022 volumes by at least 1.5 billion gallons. This will not diminish the still-robust use of biofuels in the United States, and will more realistically align blending targets with actual capabilities to blend, after accounting for engine and infrastructure constraints. The EPA could also consider reducing the 2020 and 2021 volumes by at least 1.5 billion gallons, which would provide relief in the Renewable Identification Numbers market for obligated parties but would also not undermine farmers or renewable fuels producers. Taking these steps would go a long way towards ensuring the overall goals of the RFS program, while protecting thousands of good paying jobs.

Thank you for the opportunity to offer my perspective on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joanna McClinton". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Joanna McClinton
Democratic Leader
Pennsylvania House of Representatives
191st Legislative District