American Petroleum Institute

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EPA–HQ– OAR–2021-0324
U.S. Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Submitted via: www.regulations.gov

Re: **EPA–HQ–OAR–2021-0234**

Proposed Rule: Renewable Fuel Standard (RFS) Program: RFS Annual Rules. 86 Fed. Reg. 72436 (December 21, 2021)

The American Petroleum Institute (API) is the national trade association that represents all aspects of America's oil and natural gas industry. Our nearly 600 corporate members represent all segments of the industry. These companies are producers, refiners, suppliers, marketers, pipeline operators and marine transporters as well as service and supply companies that support all segments of the industry, and they provide most of our Nation's energy. As refiners and importers of transportation fuels, our member companies are obligated parties under the Renewable Fuel Standard (RFS) program. We appreciate the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) for the 2021 and 2022 RFS volume standards and other issues.

The RFS is reaching a transition, as the volume targets change from the statutorily defined period through 2022 into the future phase where EPA will establish new standards in the upcoming RFS Set Rule. API believes the future changes to the RFS should be designed to facilitate the transition to lower carbon fuels. It is important that EPA establish feasible and achievable RFS Standards in 2022 to ensure the RFS program is stabilized and remains an effective tool that facilitates future greenhouse gas reductions.

General comments on the NPRM

API appreciates EPA's effort to address the extremely challenging market environment in 2020 and believes that EPA's use of the "Reset" provisions under CAA section 211(o)(7)(F) is appropriate to set the renewable fuel volumes following the statutory criteria under 211(o)(2)(B)(ii). Congress specified that EPA should execute the RFS Reset by modifying the volume targets for all years that follow the triggering of the Reset obligation. EPA's goal for the current proposal should be to set RFS volume standards that are achievable in the market. We provide detailed comments on these and other important issues in the subsequent sections of this letter.

Use of the Reset authority to establish volumes for 2020, 2021, and 2022

API supports EPA's use of the Reset authority to reduce the standards to match the volumes of renewable fuels that were actually used for 2020 and 2021 in transportation. These volumes should be based on an evaluation of EPA's Moderated Transaction System (EMTS) data that reflect biofuel volumes produced and also accounts for volumes that should be removed due to exports, invalid RIN generation, or biofuel spills. Any volume greater than actual consumption in the US would require the use of carryover RINs for compliance.

Small refinery exemptions for 2020, 2021, and 2022 should not be granted, and no volumes should be reallocated. As such, final standards should be set consistent with the proposed "low" percentage standards, using updated EIA gasoline and diesel demand and zero values for the terms GEi and DEi.

- 2020: The RFS is a prospective program and API has generally not supported retroactive changes. However, 2020 was a unique and unprecedented year, and API understands EPA's rationale for reducing the 2020 volume standards to volumes actually used in the marketplace. In addition to the fuel demand declines experienced in 2020, it is also appropriate to revisit 2020 volume standards to remove the inappropriate reallocation of small refinery exemptions.
- 2021: API supports setting the final standards at the actual volumes used based on the latest EMTS data and the use of the latest available data from EIA in determining 2021 fuel demand.
- 2022: EPA has proposed standards for 2022 that are a significant increase over the proposed volumes for 2021. API believes the 2022 proposed volumes are too high and will not be achievable in the market without the use of carryover RINs.

  The proposed volume for total renewable fuels is 20.770 billion RINs. In addition, EPA has proposed a supplemental standard of 250 million RINs for 2022. Therefore, the combined effective volume standard for 2022 is 21.020 billion RINs. This is a 13.5% increase over the proposed 2021 volume standard of 18.52 billion gallons.

  However, in the Draft Regulatory Impact Analysis EPA projects that only 20.457 billion RINs of total renewable fuels may be available in 2022. When compared to the total demand of 21.020 billion RINs, this represents a potential shortfall of 563 million RINs:

Proposed 2022 Total Volume Standard	
	Billion RINs
Total Renewable Fuel Standard	20.770
Supplemental Standard	0.250
Total Effective Volume Standard	21.020
EPA Projected Volumes of Biofuels Available in 2022*	
	Billion RINs
Cellulosic Biofuel	0.770
Biomass Based Diesel	5.610
Sugar Cane Ethanol	0.161
Other Advanced Biofuels	0.128
Corn Ethanol	13.788
Total Projected Volume Available	20.457
Potential Shortfall	0.563
** Projected volumes from Draft Regulatory Impact Analysis, pages 166, 178, 181, 182, and 185*	

EPA's projection of available renewable fuels relies on a 50% increase in biodiesel and renewable diesel over a two-year period, from 3.814 billion RINs in 2020 to 5.610 billion RINs in 2022. If the actual biomass-based diesel production does not meet this optimistic forecast, the potential shortfall will increase. The imbalance between RIN supply and RIN demand in 2022 will likely result in a significant drawdown of the carryover RIN balance.

After conducting its analysis of the various criteria set forth in CAA 211(o)(2)(B)(ii), EPA deemed it necessary to lower the 2020 and 2021 volumes. A similar approach is appropriate for establishing 2022 standards, using a combination of actual data, and forecast data. Absent a robust justification based on CAA 211(o)(2)(B)(ii) criteria, it would be arbitrary to impose the significant volume increase from 2021 to 2022 as proposed. For these reasons, API urges EPA to revise the 2022 volume standards to a level that can be met with actual production and supply of renewable fuels.

Cellulosic Waiver

EPA proposes to use its cellulosic waiver authority to address the shortfalls in cellulosic biofuel availability. API supports EPA's use of the cellulosic waiver, and we support EPA's proposal to reduce the advanced biofuel standard and the total renewable fuel standard by the full amount of the cellulosic renewable fuel reduction.

Response to the ACE Remand

The United States Court of Appeals for the District of Columbia Circuit (D.C. Circuit) remanded the rulemaking establishing 2014-2016 renewable fuel standards to EPA for further consideration. The D.C. Circuit did not prescribe or require that EPA resolve the issue by adding 500 million RINs into a future year (or years). In 2019, EPA proposed volume standards for 2020 that would maintain the 2016 volume requirements, recognizing that revising the obligation at that time would be unduly burdensome and inappropriate.[1] API continues to support this approach. As EPA noted in that proposal, and again in the current proposal, the D.C. Circuit directed that EPA balance the burden on obligated parties with the goals of the RFS program. It is simply not possible to go back in time and induce additional demand for a prior year.

EPA has instead proposed to increase the mandate by 250 million RINs in 2022 and plans to propose an additional 250 million gallons in 2023 to account for what the court deemed as a misuse of EPA's general waiver authority for the 2016 compliance year. However, if EPA had finalized 2016 standards without invoking its general waiver authority, the agency would likely not have set the 2016 standard higher by a volume of 500 million gallons. EPA did not maximize the use of its cellulosic waiver authority on the advanced and total renewable fuel categories in setting the 2016 standard. EPA reduced the cellulosic volume by 4.02 billion RINs and reduced the advanced requirement by only 3.64 billion RINs. In balancing the burden on obligated parties with the goals of the program, EPA should therefore be evaluating the issue with 120 million RINs in mind, not 500 million RINs.

Any volume increase attributed to the 2016 remand should apply to the total renewable volume category only. Some stakeholders have advocated for addressing the court decision by allocating a volume increase across advanced and cellulosic categories, and EPA should dismiss those comments.

[1] 84 Fed. Reg. 36762 (July 29, 2019)

EPA only used the general waiver authority in 2014-2016 to reduce the total renewable volume category. Thus, the Court's remand is only applicable to that category.

Interactions Between the RFS Annual Volumes

In resetting the volumes in 2020, EPA should consider the potential impact to individual obligated parties compliance plans. Refiners and importers who did not intend to carry a deficit forward have executed plans to meet 2020 requirements by acquiring sufficient RINs for each of the biofuel standards. With a reduction of the 2020 requirements, some obligated parties may be holding a number of 2020 RINs that exceed the 20% maximum threshold permitted for use in meeting the 2021 volume standards as allowed under 40 CFR 80.1427(a)(5). Similarly, this excess volume of RINs held would potentially roll into the 2022 compliance period. Although EPA found that the 20% carryover limit was not a binding constraint, the assessment was based on aggregate data and individual obligated parties that took a conservative approach may negatively be impacted.[2] Therefore, API believes it is appropriate for EPA to temporarily increase the 20% cap on satisfying obligations and suggests increasing the limitation to 40% for 2021 compliance, and 30% for 2022 compliance. In addition, for 2021 and 2022, EPA should refrain from enforcing requirements to disclose RIN holdings that exceed certain thresholds. Companies taking a conservative approach to the uncertainty caused by delayed rulemakings should not be unnecessarily penalized.

Treatment of Carryover RINs

EPA should set volume standards that are achievable in the market and do not rely on drawdown of the RIN bank to demonstrate compliance. Maintaining a RIN bank provides flexibility for obligated parties to meet unforeseen events and facilitate market functionality; functions recognized by EPA in this proposal and in previous annual RFS rulemakings.

EPA notes in the proposal that "further increasing the standards with the intent to draw down the carryover RIN bank would lead to significant deficit carryovers and potential non-compliance by some obligated parties that own relatively few or no carryover RINs." EPA also predicts that a drawdown of the RIN bank in 2022 would occur if the projected growth in renewable fuel volumes do not materialize.[3] Absent an immediate and structural change to the blendwall problem, API believes the 2022 standards as proposed will likely require a drawdown of the RIN bank below a level that would enable market liquidity. In addition, we challenge the presumption that non-compliance is a viable option for obligated parties as is quoted above and discussed elsewhere in the proposal. In the event of RIN shortages, it is more likely that companies that intend to continue in operation would be required to reduce their production and import of obligated fuels to ensure compliance.[4]

API supports EPA statements expressing an intent to not rely on carryover RINs in setting renewable volume standards, and we believe EPA should take a conservative approach to ensure consistency with this stated goal. EPA made a similar commitment in establishing final 2019 standards saying: "we do not believe we should intentionally draw down the bank of carryover RINs … The current bank of carryover RINs provides an important and necessary programmatic buffer that will both facilitate individual

[2] Parsons, Nick, Carryover RIN Bank Calculations for 2020-2022 Proposed Rule. Docket EPA-HQ-OAR-2021-0324
[3] 86 FR 72455
[4] NERA Economic Consulting, Economic Impacts Resulting from Implementation of the RFS2 Program (2012, 2015).

compliance and provide for smooth overall functioning of the program."[5] Despite these intentions, EPA now projects that the carryover RIN bank will be nearly halved from 3.48 billion RINs in 2019 to 1.85 billion RINs in 2020, following 2019 compliance.[6] EPA must reassess the RIN bank based on uncertain future SRE actions and set standards that preserve the carryover RINs inventory by further reducing 2022 advanced and total biofuel requirements. Regulatory certainty and compliance flexibility through preservation of the RIN bank is critical as the program transitions in 2023 and EPA determines volume targets in the RFS 'set' process.

The Agency indicates that it has received comments suggesting that the cellulosic standard should be increased to account for all cellulosic RINs carried over from one year to the next. EPA has correctly proposed to dismiss this suggestion, and API notes that implementing such a change would inappropriately limit the lifespan of cellulosic RINs and conflict with congressional direction. When EPA exercises its cellulosic waiver authority, EPA is to "reduce the applicable volume of cellulosic biofuel . . . to the projected volume,"[7] and as the D.C. Circuit has concluded, "the "projected volume of cellulosic biofuel" seems plainly to call for a prediction of what will actually happen."[8]

Biointermediates

API appreciates the re-proposal of provisions that allow RINs to be generated for renewable fuels produced from biointermediate feedstocks. Finalizing these provisions enables the production of lower carbon biofuels from existing technologies and encourages the development of innovative new approaches to produce renewable fuels.

- Mandatory QAP

API supports requiring QAP participation for the generation of biofuels using biointermediate feedstocks. EPA's QAP program is an effective deterrent for generating invalid RINs and helps assure the integrity of the RFS program.

- Biointermediates Transfers

API does not support the proposed limits on biointermediate transfers, particularly given that participation in the QAP program will be mandatory for all facilities in the biointermediates custody chain. In the event that transfer limits are finalized, EPA should provide a process that allows parties to petition the Agency for an exception that allows additional transfers.

Transfer limits inhibit innovation and competition, and a single transfer limit is unworkable in the event that a process unit experiences unexpected issues, unplanned maintenance, or other unpredicted operating situations. API recommends: (1) EPA allow multiple facilities to make substantial alterations to a feedstock in the chain of custody before receipt by a renewable fuel producer, (2) EPA allow biointermediate production facilities to transfer biointermediates to more than one renewable fuel production facility, and (3) Any biointermediate transfer limits that are imposed apply only to the number of renewable fuel producers, and not to the number of renewable fuel producer facilities. A

[5] 83 FR 63710 (December 11, 2018)
[6] 86 FR 72449 (December 21, 2021)
[7] CAA Section 7545(o)(3)(B), 7545(o)(7)(D)(i)
[8] U.S. Court of Appeals for the DC Circuit. No. 12-1139-1417101 January 25, 2013 uscourts.gov Accessed 2/2/22

biointermediate producer or renewable fuel producer may own multiple facilities, and any transfer limits imposed should not impose unnecessary restrictions to corporations owning multiple facilities.

Consistent with these recommendations, the proposed registration requirements at 40 C.F.R. § 80.1450(b)(1)(ii)(B)(1) should be revised to as shown below:

> *(B) For registrations indicating the production of any biointermediate, the biointermediate producer must provide all of the following:*
>
> > *(1) For each biointermediate production facility, the company name, EPA company registration number, and EPA facility registration number~~s~~ of the renewable fuel producer and ~~that~~ renewable fuel ~~producer's~~ production ~~facility~~ ~~facilities~~ at which the biointermediate produced from the biointermediate production facility will be transferred and used.*

EPA proposes to require that biointermediates remain segregated from the point of their production to the point where the batch is received at the renewable fuel production facility. API opposes this limitation, and recommends EPA permit the comingling of biointermediates that share similar physical characteristics. Segregating shipments of products with the same chemical makeup unnecessarily complicates logistics and unnecessarily increases costs. In this respect, biointermediates should be treated the same way other renewable feedstocks are treated, and EPA should acknowledge that required participation in the QAP is sufficient to assure RIN integrity.

Requirements for biointermediate producers at 40 C.F.R. § 80.1476 should be revised as follows:

> *(2) A batch of biointermediate must be segregated from other batches of biointermediate ~~(even if it is the same type of biointermediate)~~ and other feedstocks from the point that the batch of biointermediate is produced to the point where the batch of biointermediate is received at the renewable fuel production facility designated under §80.1450(b)(1)(ii)(G)(1).*

- Product Transfer Documents

API opposes the creation of unique identifiers on RIN Product Transfer Documents (PTD) that indicate which RINs were generated from biointermediates. Assurances provided by the QAP are sufficient to address a buyers' RIN validity concerns.

- Attest Engagement and Recordkeeping Requirements

API agrees with EPA's proposal to require biointermediate producers to undergo annual attest engagements similar to current annual attest engagement requirements for renewable fuel producers.

- C-14 Testing and Mass Balance for RIN Generation

Under § 80.1426(f)(4)(iv), EPA proposes that renewable fuel producers who generate RINs by co-processing biointermediates with non-renewable fuels must calculate the renewable fraction of the fuel and the volume of resulting RINs for each batch using only the Accelerator Mass Spectrometry Carbon-14 dating test method, per § 80.1426(f)(4)(i)(B). API supports ^{14}C (or C-14) testing as an option; however, some processes lend themselves to accurate mass balancing, which should be allowed.[9] EPA should permit a process whereby a renewable fuel producer could petition the agency to use a mass balance

[9] National Renewable Energy Laboratory, Prepared for CARB Co-Processing Working Group. December 13, 2016. PowerPoint presentation accessed at: https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/lcfs_meetings/12132016nrel.pdf on 2/2/22

approach (Method A per § 80.1426(f)(4)(i)(A)), provided EPA is satisfied with data demonstrating that the method provides sufficient accuracy. C-14 testing is still not widely commercially available and is expensive to implement.

EPA should use C-14 to validate the mass balance approach. Per the ASTM D6866 standard, absolute error associated with Method B is 3 percent - meaning that the reported percent of carbon could vary by up to 3 percent above or below what exists in the sample. All C-14 results should be deemed satisfactory within an absolute error of 5 per cent compared to the calculation option chosen. Furthermore, EPA should not limit C-14 testing to a single method. In addition to identifying D6866 procedure B as a primary method, D6866 procedure C and other C-14 radiocarbon dating methodologies also should be permitted. EPA should allow alternative methods including methods established at ASTM or subject to the requirements of the Performance Based Measurement Standards that EPA applies in other fuel programs from 40 CFR Part 1090.

The proposal to limit quantification to only C-14 testing fails to follow directives in Congressional appropriations language regarding biointermediates, and the methods for determining the renewable content of co-processed. Congress included the language excerpted below in reports[10] accompanying legislation[11] funding the EPA since FY2020.

> ***"Biointermediates****. - The Committee is aware that the Agency included provisions on the production, transfer, and use of biointermediates in its proposed rulemaking ''Renewables Enhancement and Growth Support'' [REGS rule]. …* ***The Committee encourages the Agency to allow the use of either of the two methods for determining the renewable content of co-processed fuels currently found at 40 CFR 80.1426(f)(4)****…"*

- Amendments to 40 C.F.R. § 80.1401 Definitions

Biointermediate: The definition of Biointermediate at 80.1401 should be modified at clauses (4), (5), and (6).

- Clause (4): To clarify what constitutes a biointermediate and what is not considered a biointermediate, clause (4) should be modified to require that the renewable fuel feedstock be identified in the fuel pathway.
- Clause (5): EPA has proposed to specify three general categories of intermediate products which will be considered as biointermediates: biocrude, free fatty acid (FFA) feedstock, and undenatured ethanol. We recommend the addition of an additional biointermediate category:

[10] https://www.congress.gov/congressional-report/116th-congress/senate-report/123/1?overview=closed

[11] *H.R. 133 Consolidated Appropriations Act, 2021 (Enacted December 2020).* Report Language (Division G) (Interior EPA Joint Explanatory Statement Accompanying HR 133, Consolidated Appropriations Act 2021: *Biointermediates. -The Agency is directed to continue to follow the guidance contained in Senate Report 116-123 regarding biointermediates. The Committees appreciate the work of the Agency to address the coprocessing of biointermediates. Consistent with the guidance in Senate Report 116-123, the Committees expect the Agency to finalize a rule permitting the production, transfer, and use of biointermediates within 90 days of the date of enactment of this Act. The Committees direct the Agency to brief the Committees within 60 days of enactment of this Act about its plans for action.*

Generally, these appropriations instructions are in place for the fiscal year for which the funding is provided – however, they can continue should the fiscal year continue. As the federal government currently operates under a Continuing Resolution – extending the FY2021 appropriations levels (with certain exceptions) into FY2022 (through February 18, 2022) due the failure to enact FY2022 funding legislation, unless otherwise contradicted or otherwise noted, Congressional direction, including that contained in report language, remains in place. While report language is not law, it is the Appropriations Committees' way of recommending to the Agency or Department in question how to address certain aspects or initiatives in a manner that Congress supports.

alcohols, including methanol, n-butanol, and isobutanol. The additional alcohols can be utilized directly for transportation fuels, and they may also be used as intermediate compounds in several pathways that utilize alcohols for conversion to hydrocarbons. Allowing these alcohols to be transferred as biointermediates will provide flexibility and allow new pathways for production of cellulosic fuels.

- Clause (6) in the Biointermediate definition should be modified by adding two sub-clauses. The first sub-clause would clearly identify the processing steps that do not trigger the biointermediate designation. These permitted processing steps were discussed in the preamble of this proposed rule and appear in the proposed regulatory text in 80.1460 (k)(2). We also propose adding "removing trace impurities" to the list of permitted processing steps. The addition of "removing trace impurities" is required to allow removal of trace metals. Also, processing that does not alter the chemical composition of the bulk feedstock, such as mild hydrotreating for trace metals removal, should be permitted without triggering the biointermediate designation.

  The second sub-clause is needed to clarify that the portion of the feedstock that is not substantially altered is not considered as biointermediate. This is consistent with the example of how free fatty acids would be classified as a biointermediate, but the remainder of the feedstock would not be classified as a biointermediate (e.g., distillers corn oil).

- The specific text changes to clauses (4), (5), & (6) are detailed below:

  "(4) It is made from the feedstock identified in an approved pathway (as described in table 1 to § 80.1426 or a pathway approval pursuant to § 80.1416) and will be used to produce the renewable fuel in accordance with the process(es) listed in that ~~the~~ approved pathway ~~(as described in table 1 to § 80.1426 or a pathway approval pursuant to § 80.1416) that the biointermediate producer and renewable fuel producer are using to convert renewable biomass to renewable fuel~~.

  (5) Is one of the following:
  (i) Biocrude.
  (ii) FFA feedstock.
  (iii) Undenatured ethanol feedstock
  (iv) other alcohols (including methanol, n-butanol, and isobutanol)
  (6) A feedstock listed in a pathway in Table 1 to § 80.1426, or in an approved pathway petition under § 80.1416, and used to produce the renewable fuel specified in that pathway or approved petition using the specified process requirements, as applicable, is not a biointermediate.

  (i). Feedstocks that are not substantially altered are not biointermediates. Form changes of renewable biomass such as chopping, crushing, grinding, pelletizing, filtering, compacting/compression, centrifuging, degumming, dewatering/drying, melting, removing trace impurities, or the addition of water to produce a slurry do not constitute substantial alteration.

  (ii) If a biointermediate is derived from a portion of a feedstock, only the portion that was substantially altered is a biointermediate."

Biocrude: The definition of biocrude should be modified to include other processes that are approved by the pathway but may be conducted at the biointermediate production facility. For example, hydrotreating of a feedstock may occur at a separate location from renewable fuel production, which should be included in the definition of biocrude.

> *"Biocrude means a liquid biointermediate produced from renewable biomass through gasification or pyrolysis or process identified in a approved pathway (as described in § 80.1426 Table 1 or a pathway approval pursuant to § 80.1416) ~~at a biointermediate production facility~~ to be used to produce renewable fuel at a refinery as defined in 40 CFR 1090.80."*

Produced from Renewable Biomass: The definition should be revised to add the word "primarily." Without this revision, it would imply that any reprocessing using non-biomass constituents would render a fuel no longer produced from renewable biomass. Hydrotreating would be a prime example of this where hydrogen is introduced in the finished fuel may be derived from petroleum feedstocks:

> *"Produced from renewable biomass means that the energy in the finished fuel or biointermediate comes primarily from renewable biomass."*

Renewable fuel producer: This definition needs to be added to be consistent with the "Foreign renewable fuel producer" definition in the same section. This will avoid confusion in the interpretation of the regulatory provisions; for example, a renewable fuel producer may own multiple renewable fuel producing facilities.

> *"Renewable fuel producer means a person who produces renewable fuel for use in transportation fuel, heating oil, or jet fuel."*

- Registration references

The proposed rule refers to registration requirements under § 80.1450(b)(1)(ii)(G)(1) in four separate occasions at 86 CFR 72495, 72496, and twice at 72499. The reference appears to be invalid and should be corrected in the final rule.

Amendments to Fuel Quality and RFS Regulations

- Revision of E15 1 psi RVP Waiver language: Pursuant to the vacatur of the E15 1 psi RVP rule, EPA should revise the language at 1090.215(b)(2) to state:

> *"…must contain ethanol at a concentration of at least 9 volume percent and no more than ~~15~~ 10 volume percent."*

- Revision of terms GE_i and DE_i in §80.1405: EPA should change the definition for the terms GE_i and DE_i in the RFS Standard equation in §80.1405. The words "projected to be" should be removed from these definitions. This change is required to remove the reallocation mechanism for small refinery exemptions, consistent with EPA's proposal to deny the outstanding SRE petitions.

Public Access to Information

API opposes EPA's disclosure of market sensitive and confidential information provided to the agency in various petitions. If EPA insists on finalizing this aspect of the proposal, it should at the very least adopt a policy under which it will only release this information to the public after it takes final action on an individual party's case - for instance, when it rules on an individual SRE petition or proves a violation.

RFS Set

EPA will soon be proposing the RFS Set rule that will establish the RFS volumes for 2023 and beyond. It is imperative that EPA complete this rulemaking as soon as possible in 2022 to provide the industry the necessary guidance to comply with the RFS in 2023 and beyond. Given the shortness of time, we suggest that EPA focus first on a combined rule for 2023-2025. This will provide the industry with certainty and allow the Agency time to develop a more robust Set rule that shapes the RFS program to drive greater future reductions in GHG emissions.

Thank you for the opportunity to provide these comments.

Sincerely,