



**Frank J. Macchiarola**  
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August 30, 2019

Viki Arroyo  
Executive Director  
Georgetown Climate Center  
600 New Jersey Avenue, NW  
Washington, DC 20001-2075

Re: Transportation Climate Initiative

The American Petroleum Institute (API) is the national trade association that represents all aspects of America's oil and natural gas industry and our 625 member companies provide most of our Nation's energy.

API member companies have experience in complying with GHG reduction programs in the U.S. and internationally and our association wishes to provide constructive input as the Transportation Climate Initiative (TCI) program develops. While high level concepts have been discussed at Georgetown Climate Center facilitated workshops, several program details remain undecided. We urge you to develop and share more detailed data.

At the April 30, 2019 Workshop, Georgetown Climate Center staff proposed the preferred point of compliance at the EIA defined "Prime Supplier" level. Without commenting on the overall merits of the TCI program, API does not support "Prime Supplier" as the point of compliance for determining obligated volumes for a regional GHG program. Instead we recommend that states in the region use the point of taxation. States already maintain robust and verifiable systems that track transportation fuels distributed in the state and ensure the appropriate state taxes are collected. Duplicating this system is an unnecessary burden for states and obligated parties alike.

We look forward to learning more about the TCI program and appreciate the opportunity to provide feedback as specific recommendations are developed.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank J. Macchiarola", written in a cursive style.

Frank J. Macchiarola  
Vice President  
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