



6905 S. 1300 E. #288, Cottonwood Heights, UT 84047-1817

FUELING UTAH'S GROWTH & PROSPERITY

September 24, 2025

The Honorable Mike Lee
United States Senate
Washington, D.C. 20510

The Honorable Mike Kennedy
U.S. House of Representatives
Washington, D.C. 20515

Re: Support for the *Protect Consumers from Reallocation Costs Act of 2025*

Dear Senator Lee and Representative Kennedy:

On behalf of the Utah Petroleum Association, a Utah-based, statewide petroleum trade association representing companies involved in all aspects of Utah's oil and gas industry, and specifically 5 refineries all meeting the EPA definition of "small refineries", I write to express our strong endorsement of the *Protect Consumers from Reallocation Costs Act of 2025*. This legislation is essential to maintaining a robust domestic oil and gas industry, protecting consumers, and advancing the President's energy dominance agenda.

We support this bill for the following reasons:

1. Preventing duplicative obligations on U.S. refineries

Under current proposals, the Environmental Protection Agency (EPA) is considering "reallocating" volumes waived under the small refinery exemption (SRE) program into future compliance years. This threatens to impose obligations that go beyond what the law requires, creating a duplicative regulatory burden on refineries that have already been exempted. The *Protect Consumers from Reallocation Costs Act* explicitly prohibits EPA from creating such duplicative obligations.

2. Shielding consumers from cost increases

Third-party analysis shows that reallocating exempted volumes into future compliance years would come with a price tag of nearly **\$7 billion**. If the EPA is permitted to reassign these waived volumes, those costs will not disappear—they will be passed

along to consumers in the form of higher gasoline and diesel prices. This legislation prevents that outcome.

3. Supporting domestic energy security and economic viability

Our refineries are already operating under significant regulatory and market pressures. Adding further obligations—especially retrospective ones—would undermine investment, undercut jobs, and weaken our ability to supply energy reliably. This bill helps ensure that refineries are treated fairly under the Renewable Fuel Standard (RFS) and related programs.

4. Aligning with the President’s energy dominance and national strategy

The policy goals of energy independence, affordable energy for American families, strengthening the domestic production base, and ensuring U.S. leadership in global markets are central parts of the energy dominance agenda. By preventing costly overreach by regulatory agencies, this bill helps protect American consumers and ensures that our energy policy remains anchored in fairness and predictability.

For all of these reasons, UPA strongly supports final passage of the *Protect Consumers from Reallocation Costs Act of 2025*. Thank you for your continuing work to defend domestic energy producers, preserve affordable fuel for consumers, and uphold the core precepts of regulatory certainty and fair competition in our energy markets.

Sincerely,

A handwritten signature in black ink, appearing to read "Rikki Hrenko-Browning". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Rikki Hrenko-Browning
President
Utah Petroleum Association