



**DIRECTOR'S WRITTEN INTERPRETATION FOR
RENEWABLE FUEL STANDARD INTERIM ADMINISTRATIVE RULES
ON POSITION HOLDERS AND BOOK AND CLAIM COMPLIANCE REPORTING**

On June 4, 2024, the Bureau of Planning and Sustainability (BPS) received a request to issue a written interpretation on how position holders comply with Book and Claim reporting. Book and Claim reporting was initially designed for fuel importers, but position holders may also have the information required for Book and Claim reporting.

In February 2024, BPS amended Section 6.D.8 of the Renewable Fuel Standard Interim Administrative Rules (RFS Interim Rules) to allow position holders to use Book and Claim reporting. However, BPS did not carry the amendment through all Book and Claim reporting requirements. Specifically, the compliance calculations in Section 6.E.1 refer only to imported fuel.

BPS intended position holders to have the same duties and opportunities as a fuel importer for the purposes of Book and Claim reporting. BPS will interpret the RFS Interim Rules accordingly.

BPS is issuing this written interpretation now, out of an abundance of caution, so covered entities can confidently begin their compliance obligations on July 1, 2024. BPS will initiate formal rulemaking at the beginning of July 2024 to adopt permanent administrative rules and BPS will memorialize position holder obligations at that time.

Eric Engstrom, Director

June 12, 2024

Date



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