



Changed market conditions since EPA issued the NPRM warrant further analysis and reconsideration of EPA's assertions that:

1. The economic impacts of the RFS2 program on regulated parties, including the impacts of the required volumes of renewable fuel, were already addressed in the RFS2 final rule promulgated on March 26, 2010 (75 FR 14670). 78 FR 26 at 9304 col. 2 (February 7, 2013);
2. [T]his proposed action will not have a significant economic impact on a substantial number of small entities. Id. at 9304 col. 3. Note: the analysis to support the certification considers the price of cellulosic waiver credits but does not address the price of ethanol RINs; and
3. This action is not a "significant energy action" as defined in Executive Order 13211, "Actions Concerning Regulations That Significantly Affect Energy Supply, Distribution, or Use" (66 FR 28355 (May 22, 2001)) because it is not likely to have a significant adverse effect on the supply, distribution, or use of energy. This action simply proposes the annual standards for renewable fuel under the RFS program for 2013. Id. at page 9305 column 2.