



June 28, 2022

VIA ELECTRONIC MAIL

Office of Senator Joe S San Augustin
Chairman, Committee on General Government Operations, Appropriations & Housing
Office of Finance and Budget
36th Guam Legislature
Guam Congress Building, 163 Chalan Santo Papa
Hagåtña, Guam 96910

RE: IP&E Holdings LLC comments on Bill No. 290-36 (LS)

Dear Chairman San Augustin,

Thank you for the opportunity to comment on Bill No. 290-36 (LS) concerning the liquid fuel tax and the business privilege tax. IP&E operates Shell retail locations throughout the Territory of Guam and has supported previous legislation concerning suspension of the liquid fuels tax and has passed those savings on to consumers.

The proposed legislation would require, for a period of 2 years from enactment of the bill, that all liquid fuel retailers identify on customer receipts, pumps and retail location a breakdown of BGRT and the liquid fuel tax remitted to the Government. The imposition of these requirements will result in additional administrative costs to our Point of Sales Systems and operations. These costs would have to be factored into the pricing and unfortunately would have an additional upward pressure on costs. As an effective means of communication of the impact of the liquid fuel tax suspension we could display this information at our retail locations and website.

Concerning the BGRT, we are concerned that specifically identifying this amount would create the implication that this charge is being paid directly by the customer which is contrary to the case and in conflict with existing law. For these reasons we respectfully request that this provision of the law with respect to BGRT be removed and consideration be given to our suggestion on notification of the LFT exemption.

IP&E Holdings, LLC.

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Thank you for your time and attention to this request and the opportunity to comment on the legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "St Carrara".

Steven Carrara
General Counsel

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