PBF Energy Inc.
1 Sylvan Way, Second Floor
Parsippany, NJ 07054
Office 973.455.7500
Fax 973.455.7560

www.pbfenergy.com

April 14, 2014

Mr. Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street & Constitution Avenue NW
Washington, DC 20551

Via Agency Website

Re: Docket No. 1479 and RIN 7100 AE-10: Complementary Activities, Merchant Banking Activities, and Other Activities of Financial Holding Companies related to Physical Commodities, Advance Notice of Proposed Rulemaking

Dear Mr. deV. Frierson:

I am writing on behalf of PBF Energy Inc., one of the largest independent refiners in North America. Through our subsidiaries we operate oil refineries and related facilities in Delaware City, Delaware, Paulsboro, New Jersey and Toledo, Ohio.

We are active in the physical commodity markets, so we encourage the Board of Governors to ensure that the final regulations developed through the rulemaking process allow Financial Holding Companies (FHCs) to continue to participate in markets that are fair, open, transparent, and serve their participants efficiently, without any negative effects on those markets. We see market liquidity as a major issue going forward if FHCs are unable to participate, which would make it very difficult for end-users of physical commodities to efficiently transact in these markets and effectuate hedging strategies.

We view FHCs as being uniquely positioned to serve the markets, so we encourage the Board of Governors to develop regulations that allow FHCs to continue in this role:

1. FHCs are in the business of making markets. Their physical commodities activities allow end-users to transact in these markets at specific points in time, depending on each end-user's specific day-to-day business needs and risk profiles. FHCs, given their size, sophistication, and business model, allow end-users to efficiently transact in the markets, how and when they need to.

2. Given their sophistication, FHCs can customize trades to the specific needs of each end-user, allowing end-users to most effectively hedge underlying risks.

3. Because FHCs are large, liquid entities authorized to hold title to physical commodities, end-users of physical commodities are able to use FHCs' services through the course of their day-to-day

business activities, from sourcing raw materials, to delivering refined materials to the point of sale without arranging for independent financing or engaging in additional risk mitigation.

For the reasons outlined above, we hope that the final rule does not restrict FHCs from being able to continue participating in commodities markets.

Thank you for considering our position.

Sincerely,

John E. Luke
Treasurer