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The Honorable Marie Therese Dominguez, Esq.  
Commissioner, New York Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Dear Commissioner Dominguez:

As the Climate Action Council and its supporting bodies do the important work of developing recommendations to implement the Climate Leadership and Community Protection Act (CLCPA), I am writing to you and other key leaders in this process to communicate bp's belief that those recommendations should include participation in a cap-and-invest program such as the Transportation and Climate Initiative program to reduce emissions from the transportation system (TCI-P). Such a program could be an important complement to other programs under consideration, including the New York Clean Fuel Standard, which we also support.

bp is a major distributor and marketer of gasoline and diesel transportation fuel in New York, with nearly 400 retail sites supplying between 600M and 700M gallons of fuel annually. We consider New York to be a key market for us in the United States. Should New York adopt TCI-P and the Clean Fuel Standard, these programs will have a direct impact on bp, and a potentially transformative effect on the transportation system. That is why we support them. We believe that business as usual is no longer the answer.

Last year we announced our ambition to become a net zero company by 2050 or sooner, and to help the world get there, too. That includes advocating actively for well-designed progressive climate policies. We have also established ambitious milestones for our business as we transform from an international oil company to an integrated energy company. These include:

- Reducing our oil and gas production over 40% by 2030
- A 10-fold increase in low carbon investments, from around \$500 million to around \$5 billion per year by 2030
- Developing 50 gigawatts of renewable energy generating capacity by 2030 – a 20-fold increase from today. Our entry into offshore wind in New York and Massachusetts with our partners at Equinor is an important part of helping to achieve this objective.

But while companies like ours can – and must – play a leading role in bringing about a lower carbon future, government leadership is essential. This includes adopting policies and establishing incentives that help “greening” companies, like bp, bring about real change.

We support well-designed carbon pricing programs – such as the Regional Greenhouse Gas Initiative – that use the power of competitive markets to change behavior, reduce emissions and encourage innovation. TCI-P offers another example of an efficient and cost-effective way to tackle one of the most pressing issues of our time. Such programs also provide the certainty companies need to invest and bring new technologies to people faster and at the scale required for real progress.

These programs also provide distinct benefits to the jurisdictions that adopt them. In the case of TCI-P, a recent study by the Transportation, Equity, Climate and Health (TRECH) Project showed that New York could realize tens of millions of dollars in health and safety benefits in addition to the approximately \$340M in proceeds the state could see in the first year of the program alone. These proceeds could go a long way in providing the resources needed to implement standards and programs further designed to achieve the requirements of the CLCPA.

Programs like TCI-P could also be used to help address issues of equity. We support efforts by the New York and the other TCI states to address equity in the region and the states' commitment to investments in areas such as equitable clean mobility solutions.

We applaud the holistic approach to transforming New York's transportation system being discussed in the Transportation Advisory Panel's meetings, as well as within the other panels that are making recommendations to the Climate Action Council.

We at bp share this vision of cleaner, more equitable mobility and believe the benefits of this transformation will far outweigh the costs. Nevertheless, there will be costs. Rightly, there are numerous opportunities on the agenda: Replacing the state's own fleets of vehicles with ZEVs, electrifying school buses, incentivizing truck owners and fleet operators to adopt ZEVs, and expanding transit service and improving access to it. All of them could benefit from the proceeds from TCI-P, and all of them may be harder to accomplish without.

We hope you will consider the wide-ranging benefits of programs such as TCI-P and the Clean Fuel Standard. These programs are good for people, good for the planet, good for business, and good for the State of New York. We welcome any questions you might have regarding bp and our support for these programs, as well as the opportunity, along with other like-minded businesses, to communicate our shared support for their inclusion in your recommendations.

Warm Regards,

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CC: Todd Westhuis, Chief of Staff, NY Department of Transportation  
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