



Mark Bunch

Regulatory Advisor

C&P – Fuel supply & midstream: biofuel & low carbon

bp America Inc.
30 S. Wacker Drive
Chicago, IL 60606

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Oregon Department of Environment Quality
VIA Email Transmission
CFP2022@dep.state.or.us

**Re: Oregon Clean Fuels Program (“CFP”) Expansion 2022 - Listening Session
Oct.13, 2021 Webinar**

Dear Department of Environmental Quality Staff:

On behalf of bp America, thank you for the opportunity to participate in the Oregon Department of Environmental Quality’s (“DEQ”) listening session on the Clean Fuels Program (“CFP”) and provide further comment on topics for consideration under the forthcoming rulemaking.

bp’s ambition is to become a net zero company by 2050 or sooner, and to help the world reach net zero. Consistent with bp’s ambition, we are actively advocating for well-designed policy addressing greenhouse gas emissions around the world. Our comments are given in that context.

To elaborate on oral comments made by bp during the listening session, we would urge DEQ to consider the following:

- Adopt project-based crediting for refineries of regulated entities under the CFP. This would send a strong signal for prioritizing decarbonization projects for fossil fuel producers. This signal also has the potential to be amplified if such project-based crediting were designed to work in conjunction with California’s existing low carbon fuels standard (“LCFS”) program and with Washington’s new LCFS program.
- Allow opt-in crediting for clean fuels used in exempt fuel use categories under [340-253-0250](#) (2), but without having to net out the fossil fuel deficit. This would incentivize decarbonization within these categories without incurring a cost burden to the end user. Such an approach has already been adopted by DEQ for renewable jet opt-in within the aviation sector.

In addition to the oral comments made during the listening session, we would also propose that DEQ consider adopting a book and claim accounting methodology for alternative jet fuel. This would support environmental attribute crediting under the Oregon CFP while production and logistics are at a nascent stage in their development.

bp very much looks forward to working with DEQ and key stakeholders through this rulemaking process. In the meantime, do not hesitate to reach out to me at mark.bunch@bp.com or 708-228-6093 if you have any questions or need additional context.

Sincerely,

A handwritten signature in blue ink, appearing to read "m. Bunch".

Mark Bunch
bp America