

bp America Inc.
1201 K Street, Suite 1830
Sacramento, CA 95814



March 15, 2023

Ms. Cheryl Laskowski, Chief
Transportation Fuels Branch
California Air Resources Board
Sacramento, CA 95814

Re: February 22, 2023 - Public Workshop: Potential Changes to the Low Carbon Fuel Standard

Dear Ms. Laskowski:

Thank you for the opportunity to provide comments following the California Air Resources Board's ("CARB") recent workshops to discuss potential changes to the Low Carbon Fuel Standard ("LCFS") program. With an ambition to become a net zero company by 2050 or sooner, and to help the world get to net zero, too, bp is actively engaged in advocating for policies that support this ambition. We look forward to continuing this engagement as CARB evaluates potential revisions to the LCFS.

bp supports CARB's ambitious approach to 2030 target-setting. This ambition should be underpinned by illustrative compliance scenarios that take into account the potential sources of carbon reduction available, including any potential limitations being considered for biofuel feedstock types. bp is increasing its investment in lower-carbon solutions that can help society decarbonise faster, like biofuels, which are one of the most effective and efficient ways to decarbonize the transportation sector more rapidly. bp encourages CARB to underpin its ambitious target with greater diversification of credit generating opportunities within the program.

On behalf of bp America Inc. ("bp"), I offer the following specific comments in response to the workshop presentations and associated comments and discussion.

Pathways "True Up"

In order to account for long approval periods for provisional pathways, CARB has proposed using a "true up" method to move a temporary pathway to a validated provisional pathway. Provisional pathways typically have a safety factor in addition to the verified carbon intensity to cover operational changes that can occur during the year to ensure the temporary carbon intensity does not exceed the verified carbon intensity. These credits are not returned under the current system; therefore, the LCFS program and the producer or importer of the renewable fuel do not benefit from these credits.

We request there to be a 'true up' of LCFS credits for both the time between temporary and verified provisional status, and during the annual verification of pathways to account for any difference of carbon intensity.

California's climate programs have created a model for other jurisdictions. As California and CARB continue to lead the way in policy development to advance the energy transition, bp looks forward to working with you on potential changes to California's pioneering carbon reduction programs, including the LCFS.

Sincerely yours,

Michelle Orrock

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West Coast Government Affairs
bp America Inc.