



Tanya M. DeRivi

Senior Director, California Climate and Fuels

August 18, 2023

Dr. Cheryl Laskowski
Branch Chief – Low Carbon Fuel Standard
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Sent via upload to:

https://ww2.arb.ca.gov/resources/documents/lcf-s-crude-oil-life-cycle-assessment-comments?utm_medium=email&utm_source=govdelivery

Re: WSPA Comments on the Low Carbon Fuel Standard Regulation 2022 Annual Crude Average Carbon Intensity Calculation Draft

Dear Dr. Laskowski,

The Western States Petroleum Association (WSPA) appreciates the opportunity to comment on the California Air Resources Board's (CARB) 2022 Annual Crude Average Carbon Intensity (CI) Calculation Draft, posted on August 3, 2023, pursuant to Section 95489(b)(3) of the Low Carbon Fuel Standard (LCFS) Regulation. WSPA is a trade association that represents companies that provide diverse sources of transportation energy throughout the west, including California. This includes the transport and marketing of petroleum, petroleum products, natural gas, renewable fuels, and other energy supplies.

Crude oil CI scores listed in the LCFS Regulation – as is required by the Regulation – are to be used to calculate the average crude CI for a given year. WSPA has identified incorrect CI values for four crudes supplied in 2022. It appears that CARB has used the default CI value (11.78 gCO₂e/MJ) instead of the CI value published in the Regulation for the following crudes:

- Australia – Vincent should be 6.83 gCO₂e/MJ (not the 11.78 default value)
- Mexico – Isthmus should be 11.31 gCO₂e/MJ (not the 11.78 default value)
- Saudi-Kuwait Neutral Zone – Eocene should be 7.85 gCO₂e/MJ (not the 11.78 default value)
- Saudi-Kuwait Neutral Zone – Ratawi should be 9.42 gCO₂e/MJ (not the 11.78 default value)

WSPA appreciates the opportunity to provide comments on this draft calculation. If you have any questions regarding this submittal, please contact me via email at tderivi@wspa.org.

Sincerely,

A handwritten signature in blue ink that reads "Tanya M. DeRivi".

Tanya M. DeRivi

Senior Director, California Climate and Fuels