



Mandy Garrahan  
Executive Director Strategic Planning & Public Policy

June 24, 2022

(Submitted via the Draft 2022 Climate Change Scoping Plan Comment Submittal Form)

Liane Randolph  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Comments on the Draft 2022 Climate Change Scoping Plan**

Dear Chair Randolph:

The Valero family of companies (representing operating subsidiaries of Valero Energy Corporation – collectively “Valero”) plays a significant role in the California fuel market. In addition to operating two petroleum refineries, Valero is one of the largest, if not the largest, producers of low carbon renewable fuels supplied into California. Using existing infrastructure, our renewable fuels are being used today by the current vehicle fleet to generate the lion’s share of the actual GHG emission reductions that have been achieved from the California transportation sector under the California Low Carbon Fuel Standard. Currently, there are efforts underway to produce greater volumes of renewable fuels and to further reduce the carbon intensity of these fuels. With innovation in feedstocks and production processes and carbon capture opportunities, Valero’s low-carbon liquid fuels have outperformed, and have the continuing potential to outperform, the mandated technology choices of the California Air Resources Board (CARB) in its Draft 2022 Scoping Plan, on a full life-cycle carbon intensity basis as well as on a cost basis.

Valero encourages the CARB to reevaluate its current approach to the Draft 2022 Climate Change Scoping Plan. The proposed scenario and alternatives seem to have been outcome determinative, designed to meet the Governor’s stated goal to electrify the transportation sector. This political goal appears to have foreclosed meaningful consideration of any low carbon option other than electrification – even if such options would achieve the same or better full life-cycle reduction, achieve reductions earlier, achieve reductions at lower cost, and achieve reductions with greater energy security. In addition to being legally impermissible under both State and Federal law, as detailed in these comments, the 2022 Draft Scoping Plan would forgo meaning near-term and longer emissions reductions opportunities with low-carbon fuels and would have potentially severe consequences to the welfare of Californians and California businesses.

Valero offers these comments on the 2022 Draft Scoping Plan to aid CARB in identifying critical gaps in legally mandated analyses that, if addressed, likely would result in a program markedly different than proposed, one which would establish the emission reduction standards to be met and challenge industry to compete to develop the most efficient and effective approaches to satisfy them. We respectfully suggest that CARB pause the current scoping plan effort to conduct the analyses recommended in these and other comments.



Valero appreciated the Board's consideration of the following comments, and we would welcome the opportunity to engage with CARB on the Draft 2022 Climate Change Scoping Plan.

Respectfully yours,

A handwritten signature in blue ink, appearing to read 'Mandy Garrahan', with a large, stylized 'G' at the end.

Mandy Garrahan  
Executive Director Strategic Planning & Public Policy

Enclosures

- (1) Valero Comments on Draft Scoping Plan
- (2) Attachment A – Valero Comments on ACC II