

bp America  
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Sacramento, CA 95814



October 22, 2021

Rajinder Sahota  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA. 95814

**Re: Public Workshop: 2022 Scoping Plan Update - Scenario Inputs Technical Workshop**

Dear Ms. Sahota,

With an ambition to become a net zero company by 2050 or sooner, and to help the world get to net zero, bp is actively engaged in advocating for policies that support this ambition. In addition to our long-time support for California's market-based approach to reducing greenhouse gas emissions, we actively support climate change policies throughout the US, including the Transportation and Climate Initiative (TCI), a regional collaboration seeking to improve transportation, develop a clean energy economy and reduce carbon emissions across 12 East Coast states and the District of Columbia. bp also took a leadership role in advocating for Washington state's Cap and Invest legislation, which passed earlier this year.

bp appreciates the opportunity to provide comments following the California Air Resources Board's (CARB) recent workshops to discuss the proposed PATHWAYS scenario modelling assumptions. We support CARB's commitment to staying the course with its successful approach to reducing greenhouse gas emissions as it looks towards achieving carbon neutrality by 2045, while at the same time looking for ways to improve these programs. This provides the regulatory certainty necessary for making the kinds of investments that will drive carbon reductions.

### **Low Carbon Fuels for Transportation**

bp is actively engaged in California's various markets, including our participation in the state's Low Carbon Fuels Standard (LCFS) program through the production of low carbon fuels. We applaud California's policy leadership in helping to accelerate the transition to cleaner fuels and support the development of regulatory incentives that may encourage participation in co-processing. We look forward to working with you and your staff on this critical program.

### **Low Carbon Fuels for Buildings and Industry**

As one of the largest producers and distributors of RNG fuel in California, bp supports the blending of RNG in pipeline. We also support the use of hydrogen and would encourage CARB to develop definitions for low carbon-intensity hydrogen as part of the scoping plan process with maximum possible consistency with emerging national and international definitions.

### **Electricity Generation**

bp supports California's Renewables Portfolio Standard (RPS) Program, which requires that 60% of the state's electricity come from carbon free resources by 2045. bp already has a significant onshore wind business in the U.S., with gross generating capacity of 1.7 gigawatts (GW) from nine bp-operated wind assets across the country. In January 2021, bp entered the offshore wind industry through a strategic partnership with Equinor, which includes joint development of the Empire Wind and Beacon Wind projects off the East Coast, with planned potential generating capacity of 4.4GW. To date, these projects have been selected by New York to supply 3.3GW of power to the State. bp supports the increased use of



renewable energy in California and will support the development of policies that encourage investment in this area.

### **Non-Combustion Methane Emissions**

As part of bp's ambition to become a net zero company, we have committed to eliminating routine flaring in our U.S. onshore operations by 2025 and are actively improving our methane detection and monitoring programs. Along with drone and aerial monitoring surveillance – including high-resolution and infra-red camera coverage – we are piloting continuous methane monitoring technologies. We also support the direct federal regulation of methane for new and existing sources across the oil and gas value chain and will work with CARB on similar policies.

As California and CARB continue to lead the way in policy development to fight climate change, bp looks forward to continuing to work with you in the development of the 2022 Scoping Plan Update.

Sincerely yours,

A handwritten signature in black ink that reads "Michelle Orrock".

Michelle Orrock  
West Coast Government Affairs  
bp America