



BP America, Inc

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Via Email and Electronic Submittal

Bob Fletcher
Division Chief
Stationary Source Division
California Air Resources Board

Re: Notice of Public Availability of Modified Text and Additional Documents for the Proposed Regulation to Implement the Low Carbon Fuel Standard

Dear Bob,

BP submitted comments to CARB's California Low Carbon Fuel Standard Regulation in November and May of last year, as well as in April of this year. In this current correspondence we would like to express our support for the additional Sugarcane Ethanol Pathways proposed in the 30-day package at the April LCFS Board Adoption Hearing.

BP believes that the two additional pathways more accurately reflect the variety of low carbon operations used to produce Brazilian Sugarcane Ethanol. As we are investing in state of the art facilities in Brazil, we appreciate that these additional pathways create a mechanism to encourage efficient, low carbon practices. For this reason we encourage CARB to pursue the following additional improvements to sugarcane pathways:

- 1) Update the existing assumptions for all sugarcane pathways to ensure that assumptions and practices in California GREET reflect current practices.
- 2) Anticipate the improvements that new investment will catalyze for the entire industry and schedule periodic updates to incorporate these improvements when they are achieved. Furthermore, we would stress improvements and updates specifically to Scenario 2 pathway entitled "Brazilian sugarcane with average production process and electricity co-product credit". This pathway in particular will be the category where most new investment will qualify. Updating this pathway to reflect the best practices of the industry and will encourage investment towards lower carbon innovation.

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Comments to California Air Resources Board on LCFS

Ultimately these changes will allow Sugarcane Ethanol to be accurately represented as a low carbon option that is critical to the success of the LCFS program.

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Please feel free to contact me should you wish to discuss these comments in more detail.

Sincerely,

Ralph Moran
Director, West Coast Climate Change Issues
BP America, Inc.