



**Mark Bunch**

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C&P – Fuel supply & midstream: biofuel & low carbon



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April 28, 2022

Washington Department of Ecology

VIA Website upload

<https://aq.ecology.commentinput.com/?id=DpgZ3>

**Re: Lookup Table Information Released by Washington Department of Ecology April 26, 2022**

Dear Department of Ecology Staff:

On behalf of bp America Inc., thank you for the opportunity to participate in the Washington Department of Ecology (“Ecology”) rulemaking on the Clean Fuels Program (“CFP”). bp’s ambition is to become a net zero company by 2050 or sooner, and to help the world reach net zero, too. Consistent with this ambition, we are actively advocating for policies that address greenhouse gas (“GHG”) emissions.

Following the April 26, 2022, release of Lookup Table information, bp wishes to provide the following feedback to Ecology during this extended Informal Public Comment Period.

With respect to the document “Washington CFS Tables V4” prepared for Ecology by Life Cycle Associates (“LCA”), bp has concerns with the average ethanol and biodiesel blend ratios that have been established within the tables, in part due to the use of only a single data source that we believe is inaccurate.

The above LCA document states that the average ethanol blend for finished gasoline in 2017 was 11.6%. For this to be achieved it would require a significant quantity of finished fuel with ethanol higher than E10 to have been sold. Putting aside that there would have been ethanol free E0 sales within the state for boating and recreational vehicles, if we were to assume that all of the E10 being sold as having exactly 10% ethanol content (the maximum allowable by WA Weights & Measures to qualify for the 1 psi waiver<sup>1</sup>), by simple math this would mean that in order to achieve the 11.6% average, almost a third of all gasoline sold in 2017 would have had to have been E15. When looking at the E15 scenario what also needs to be factored in is that it could not be sold year-round due to

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<sup>1</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=16-662&full=true>

summer vapor pressure limitations<sup>2</sup> and that based on the same Energy Information Agency (EIA) source<sup>3</sup> used by LCA there were no E15 retailers in the state as of July 2019.

There is an alternative bookend scenario where around 2.5% of finished gasoline could have been displaced by Flex-fuel / E85 (assuming a year-round 70% ethanol content). However, there is also the question of retail infrastructure present in 2017. The United States Department of Energy's Alternative Fuels Data Center currently has three active Flex-fuel / E85 sites listed in the state of Washington<sup>4</sup>. If one assumes that this site count is a reasonable reflection of what was available in 2017, those three sites would have needed to be responsible for about 70 million gallons of Flex-fuel / E85 sales during that year (if using the EIA finished gasoline volume reported<sup>5</sup>). With the average gas station in the U.S. selling about 1 million gallons of fuel per year in 2021<sup>6</sup>, if we assumed a similar value applied to 2017, it would seem infeasible to attribute the ethanol uplift to Flex-fuel sales.

bp believes that using EIA as a single data source to underpin the average blend ratios in Washington creates a high risk of inaccuracy and decreases credibility in all the ascribed values. The 11.6% value for ethanol gasoline does not appear credible and we would recommend that, in the absence of sufficient supporting data, Ecology should consider a default value of 10% be used. This takes into account potential rounding for E10 blending and the offsetting influence of E0 sales within the state.

With respect to the average biodiesel blend of 2.5% in 2017, this value does not seem beyond the realm of possibility, but it again relies on a single EIA source and therefore, could be perceived as lacking credibility. As such, we would recommend that LCA seek additional data sources to validate.

Thank you for the opportunity to comment on these important topics. We look forward to working with Ecology and key stakeholders through the CFP rulemaking process. In the meantime, do not hesitate to reach out to me at [mark.bunch@bp.com](mailto:mark.bunch@bp.com) or 708-228-6093 if you have any questions.

Sincerely,



Mark Bunch

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<sup>2</sup> <https://www.epa.gov/gasoline-standards/e15-fuel-partial-waivers>

<sup>3</sup> <https://www.eia.gov/todayinenergy/detail.php?id=40095>

<sup>4</sup> [https://afdc.energy.gov/fuels/ethanol\\_locations.html#/analyze?region=US-WA&fuel=E85&country=US&show\\_map=true](https://afdc.energy.gov/fuels/ethanol_locations.html#/analyze?region=US-WA&fuel=E85&country=US&show_map=true)

<sup>5</sup> [https://www.eia.gov/dnav/pet/pet\\_cons\\_prim\\_dcu\\_SWA\\_a.htm](https://www.eia.gov/dnav/pet/pet_cons_prim_dcu_SWA_a.htm)

<sup>6</sup> <https://www.convenience.org/Topics/Fuels/Who-Sells-Americas-Fuel>