

Mark Bunch

Dear ECY staff, please find comments in the attached file for the WA CFS 2024 February Rulemaking workshop. Note: Submitted by "Individual" was the only option available in the dropdown box. The comments submitted are from bp America Inc.



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Clean Fuel Standard Rulemaking, Climate Pollution Reduction Program, February 28, 2024

On behalf of bp America Inc, thank you for the opportunity to comment on the Washington Department of Ecology's ("Ecology's") 2024 Clean Fuel Standard Rulemaking.

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 bp's ambition, we are actively advocating for policies that address greenhouse gas ("GHG") emissions.

We wish to provide feedback on the following rulemaking areas that were presented by Ecology during the February stakeholder engagement sessions.

Sustainable Aviation Fuel / Alternative jet Fuel

bp supports Ecology's efforts to align the Clean Fuel Standard with ESSB 5447; an act relating to promoting the alternative jet fuel (AJF) industry in Washington. Moving to codify the date for receiving Tier 2 pathway applications for sustainable aviation fuel to the end of 2023 and aligning definitions of AJF are welcome updates to administer, but we would encourage Ecology to be bolder than seeking to align with state and federal tax incentives when searching for ways to incentivize AJF production.

An area that Ecology could explore is to incentivize AJF production through allowing book-and-claim methodologies for biomethane within the AJF supply chain. ESSB 5447 alludes to this ability in Section 3 (2), and a step further would be to encompass biomethane book-and-claim for process energy crediting within the AJF supply chain under the feedstock definition. This approach could then, for example, support ethanol earmarked for Alcohol-to-Jet technology and may open other AJF options that aren't just reliant on biomethane to hydrogen as the greatest opportunity resulting from biomethane book-and-claim for AJF production.

If the WA Clean Fuel Standard were to recognize access to low carbon intensity biomethane environmental attributes as per above, this could be a significant incentive within the authority of Ecology to implement and would be in keeping with the intent of ESSB 5447.

Refining Rule Language

Ecology states that it is keeping a running list of potential revisions. bp would propose that Ecology consider the following items to incorporate in Ecology's list.

- Introducing a method to manage credit retirements and subsequent generation between states from commingled renewable fuel storage that recognizes real world supply chain complexities. Under current regulation huge credit deficits can be incurred for inter-state movements of renewable fuels without obligation. Addressing this issue would support greater and more efficient deployment of renewable fuels within the Pacific Northwest.
- Making Table 3 (energy density factors) clearer when it comes to "Washington gasoline". It would be great to have the table verbiage more clearly indicate that the energy density includes ethanol. A suggestion would be "E10 Washington gasoline."

Thank you again for the opportunity and please feel free to contact me at mark.bunch@bp.com or 708 228-6093 if you wish to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. J. Bunch".

Mark J Bunch
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