



James Verburg
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May 6, 2026

Ms. Stephanie Potts
Washington State Department of Ecology
CPRP Program
300 Desmond Dr. SE
Lacey, WA 98503
VIA Public Comment Portal

(https://ecology.commentinput.com/?id=dh3NgpHmA&utm_medium=email&utm_source=govdelivery)

Subject: Cap-and-Invest Draft Washington-California-Québec Linkage Agreement

Dear Ms. Potts,

On behalf of bp, I am writing to provide comments on the Washington State Department of Ecology's ("Ecology") draft Washington–California–Québec linkage agreement under the Climate Commitment Act's ("CCA") Cap-and-Invest Program. We appreciate Ecology's efforts to advance linkage.

The US is at the heart of bp's strategy – we have roots that go back more than 150 years here. All bp's major businesses are active in the US, where we employ over 30,000 people and invest more than 40 percent of our capital expenditure (\$6.6b of \$16.2b globally in 2024). bp employs approximately 1,200 people in Washington, including at the Cherry Point refinery, the largest refinery in Washington, through our operation of Olympic Pipe Line Company, and at our *am/pm* and Travel Centers of America convenience and mobility outlets.

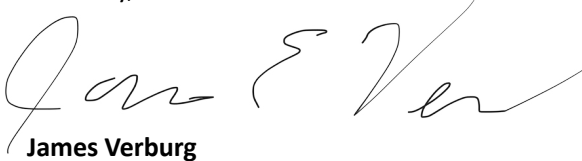
bp advocated for adoption of the CCA in 2021, and we have subsequently advocated for Ecology to make linkage a top priority in the program. We believe linkage contributes to long-term regulatory certainty and stability, which in turn encourages low-carbon investment and lowers overall decarbonization costs.

We encourage Ecology to verify that the final linkage agreement clearly provides for **full fungibility of allowances across the linked jurisdictions of Washington, California, and Québec**. Specifically, by "full fungibility" we mean that allowances from any linked jurisdiction are fully interchangeable and carry equal compliance value regardless of origin, with no jurisdiction-specific usage limits, discount factors, or other similar constraints.

Full fungibility will help create a more efficient, well-functioning carbon market with greater liquidity and market integrity across jurisdictions.

bp appreciates the opportunity to provide this feedback. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "James Verburg". The signature is fluid and cursive, with the first name "James" written in a larger, more prominent script than the last name "Verburg".

James Verburg

Regulatory Advisor; bp Products North America Inc.

cc: Pamela Brady – Senior Government Affairs Manager, US West Coast; bp Products North America Inc.