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Joint comments of UCS, CBE and APEN

Joint comments from the Union of Concerned Scientists, Communities for a Better Environment and Asian Pacific Environmental Network.

Additional submitted attachment is included below.

To: California Energy Commission

From: Jeremy Martin, Union of Concerned Scientists
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Date: December 19, 2022

Subject: Joint comments on Commissioner Hearing on California Gasoline Price Spikes, Refinery Operations, and Transitioning to a Clean Transportation Fuels Future (22-IEPR-05)

Thank you for the opportunity to comment on this timely and informative hearing. The presentations and discussion at the hearing highlight the critical need for the California Energy Commission (CEC) and other California agencies to protect California consumers from price spikes and to ensure that the phaseout of petroleum fuels is managed responsibly and in the best interests of all Californians.

We support increased CEC authority to get the data required to effectively monitor all the actors in the petroleum supply chain. We urge the CEC to make as much of this data public as possible, either directly or after appropriate aggregation, to allow for broad scrutiny of the industry's behavior.

While recent gasoline price spikes were the central focus of the recent hearing, gasoline prices are just one of many harms caused by the petroleum supply chain, and oversight and planning should consider these harms broadly.

Monitoring the industry and planning for a responsible petroleum phaseout is critical not only to the state regulators and the petroleum industry itself, but to refinery communities and environmental justice groups. For this reason any CEC advisory panel or inter-agency working group tasked with oversight or planning should include a formal seat at the table for these and other stakeholders.

While broad public participation is always important, it is especially critical given the long history of deception and bad faith by the oil industry. By refusing to participate in the hearing, oil refiners abdicated their responsibility to provide information the public and policymakers need to make informed decisions. Moreover, their failure to participate adds to a long history of greenwashing, inadequate climate pledges, funding of climate disinformation, and lobbying against climate action. The fossil fuel industry's concerted disinformation campaigns and the resulting devastating climate impacts are the subject of lawsuits by dozens of cities, counties and states across the U.S. and its territories, including multiple communities in California (Oakland and San Francisco City and County; San Mateo, Santa Cruz, and Marin Counties; Cities of Richmond, Imperial Beach, and Santa Cruz). Ongoing climate disinformation efforts by major oil and gas companies—as revealed in internal industry documents just released by the US House of

Representatives Committee on Oversight and Reform—underscore the importance of independent oversight and accountability mechanisms.