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<b>Document Title:</b>	Michelle Orrock Comments - PETITION FOR FORMAL RULEMAKING – IMPLEMENTATION OF SB X 1-2
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*Comment Received From: Michelle Orrock  
Submitted On: 5/30/2023  
Docket Number: 23-SB-02*

**PETITION FOR FORMAL RULEMAKING “ IMPLEMENTATION OF  
SB X 1-2**

*Additional submitted attachment is included below.*

bp America Inc.  
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May 30, 2023

Mr. Drew Bohan  
Executive Director  
California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

**Re: PETITION FOR FORMAL RULEMAKING - IMPLEMENTATION OF SB X 1-2**

Dear Executive Director Bohn:

I write today on behalf of bp to respectfully request that the California Energy Commission (CEC) initiate a formal rulemaking process for the implementation of SB X1-2 (Skinner).

Compliance with all regulatory reporting requirements is core to how bp operates. We will not compromise that focus and will comply with the law. And we trust that other businesses affected by this law take the same view. However, the speed at which this bill was passed did not allow for substantive discussions with stakeholders to provide clarification about reporting requirements, business sensitive data protection, and other details that will ensure that reliable data is collected. Without a formal rulemaking, there will not be opportunity for all questions and concerns to be addressed so that reporting entities are better able to comply with the requirements of the legislation.

Implementation of this bill will require additional personnel and installing extensive systems to collect data. Rulemaking will clearly define the scope of that work and will allow time for reporting entities to set up the appropriate systems to collect the required data that the CEC will use to guide recommendations for California's energy transition plan going into the future.

As a significant importer of fuels into California - including renewable fuels - bp's presence contributes to the stability of the fuel market in California. The data that is being requested by the CEC is highly sensitive and has the potential to impact the market if not handled correctly. Erecting guardrails to protect confidentiality of the data that is submitted is of paramount importance to bp as well as other reporting entities and should be considered during formal rulemaking.

In closing, bp welcomes collaboration with the CEC Commissioners and staff on implementation of this impactful legislation. We look forward to actively participating in future rulemaking to implement SB X 1-2.

Sincerely yours,

A handwritten signature in black ink that reads "Michelle Orrock".

Michelle Orrock  
West Coast Government Affairs  
bp America Inc.