

**DOCKETED**

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<b>Project Title:</b>	General Rulemaking Proceeding for Developing Regulations, Guidelines, and Policies for Implementing SB X1-2 and SB 1322
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*Comment Received From: Michelle Orrock  
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**November 3, 2023 Workshop Comments**

*Additional submitted attachment is included below.*

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November

17,2023

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

**Re: November 3, 2023 Workshop Comments**

Dear Executive Director Bohan:

I write today on behalf of bp to submit comments following the November 3, 2023 pre-rulemaking workshop to implement the provisions of SB X 1-2. We appreciate the California Energy Commission initiating this rulemaking to ensure there is an opportunity for all questions and concerns to be addressed so that reporting entities are better able to comply with the requirements of the legislation.

**CEC-D354\_I - Daily Spot Contract Weekly Report**

**- Recommended Clarifications:**

- Report timing for spot market transactions: report each transaction twice:
  1. Within one-week of the formation of a contract for a California spot market transaction.
  2. Within one week after all product transfer data is finalized.

**- Recommended Definitions:**

- Spot market transaction - A single bulk transaction involving a maximum of one product and one delivery, with title transfer occurring within 1 year. Truck rack sales are not considered Spot market transactions.
- Term deal - Any transaction involving more than one delivery month (i.e., separate leg entered for each month).

**- Transaction Tab:**

<b>Data Field Name</b>	<b>Current PIIRA Definition</b>	<b>bp Proposed Update</b>
Date and Time of Transaction	Enter the date and time of the transaction.	Enter the date of the transaction.
Product Type Traded	Enter the type of refined transportation fuel, such as gasoline, diesel, or jet fuel.	Request CEC to provide a complete list of reportable products similar to CEC M700 reporting.
Product name	Enter the product name for the type of refined transportation fuel traded. Examples include, but not limited to: CARBOB, AZBOB, NVBOB, EPA Diesel, CARB Diesel, etc.	Request CEC to provide a complete list of reportable products similar to CEC M700 reporting.

Delivery date	Enter the time and date the material that is the subject of the transaction is scheduled to be delivered or was delivered.	Enter the date the material that is the subject of the transaction is scheduled to be delivered or was delivered.
Contract Price Formula	Enter the contract price formula, including the differential from any contract formula and the unit of measurement for any price differential. For EFP contracts, provide the name of the futures product, the contract month of the futures product expressed as the two-digit month and the two-digit year (MM-YY), and the price value of the futures product	Enter the contract price formula, including the differential from any contract formula and the unit of measurement for any price differential. For EFP contracts, provide the name of the futures product, the contract month of the futures product expressed as the two-digit month and the two-digit year (MM-YY), and the price value of the futures product (if available at the time of the reporting).

### CEC-W700\_96j 96-Hour Planned Import Report

- **Recommended Definitions:**

- o Transportation fuel products: refined products and renewable fuels
- o Refined products: Finished petroleum products from crude oil, unfinished oils, natural gas liquids, other hydrocarbons, and oxygenates.

- **Marine Imports Tab:**

Data Field Name	Current PIIRA Definition	bp Proposed Update
Product	Enter the product to be moved.	Request CEC to provide a complete list of reportable products similar to CEC M700 reporting.
Loading Location	Enter the loading location or locations for cargo.	Enter the loading location or locations for cargo such as the state or country
Status of Product	Enter the status of any transportation fuel as sold before discharge.	Enter the status ('Sold' or 'Not sold') of any transportation fuel as sold before discharge.
Volume	Enter the volume (in thousands of barrels or specified unit of measurement) of transportation fuel that is being moved.	Enter the volume (in thousands of barrels or specified unit of measurement) of transportation fuel that is planned to be moved at the time of reporting.
Port of Origin	Enter the name and location of the port from which the vessel carrying the transportation fuel departed.	Enter the city of the port from which the vessel carrying the transportation fuel departed.
Port of Delivery	Enter the name and location of the port in California where the vessel carrying the transportation fuel is scheduled to arrive.	Enter the city of the port in California where the vessel carrying the transportation fuel is scheduled to arrive.

Cargo Landed Cost	Enter the cargo total landed cost of the product moved which includes all costs and fees incurred in delivery.	Enter the cargo total landed cost of the product moved which includes all costs and fees incurred in delivery. Fixed corporate costs such as employee time, rent, and office technology do not need to be included.
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In closing, bp welcomes collaboration with the CEC on implementation of this impactful legislation. As a significant importer of fuels into California - including renewable fuels - bp's presence contributes to the stability of the fuel market in California. Through this process, we encourage the CEC to pursue implementation rules that meet the intent of the legislature and that are sufficiently workable for market participants, like bp, to fully comply. bp will not compromise its commitment to compliance. That is why we will continue to meaningfully participate in this rulemaking process.

Sincerely yours,



Michelle Orrock  
West Coast Government Affairs  
bp America Inc.