

Date of Hearing: September 26, 2024

ASSEMBLY COMMITTEE ON PETROLEUM AND GASOLINE SUPPLY

Cottie Petrie-Norris, Chair

ABX2 1 (Hart) – As Introduced September 3, 2024

SUBJECT: Energy: transportation fuels: inventories: turnaround and maintenance

SUMMARY: Authorizes the California Energy Commission (CEC), if necessary and justified, to increase transportation fuel supply through various actions. Specifically, **this bill:**

- 1) Specifies the CEC may establish criteria that refiners must meet before commencing a turnaround or maintenance event, including requiring California's petroleum refiners to have resupply plans and arrangements to cover their loss in production, as specified.
- 2) Authorizes the CEC to develop and impose requirements on California refiners to maintain minimum levels of inventories of refined transportation fuels meeting California specifications. Specifies such regulations may provide:
 - a) A process for establishing a minimum level for each refiner, each fuel, and each blending component;
 - b) The locations of inventory storage and additional storage considerations;
 - c) A process for adjusting the minimum inventory requirements, as specified;
 - d) Conditions under which a refiner would draw down or rebuild its inventories.
- 3) Prohibits the CEC from adopting minimum inventory regulations unless it finds that the benefits outweigh the potential costs to consumers. As part of this cost-benefit requirement, the CEC must factor how potential regulations would:
 - a) lead to greater fuel supply in California's market;
 - b) lead to lower average retail prices on an annual basis;
 - c) reduce the severity of retail price volatility;
 - d) result in greater supply than easing supply chain inefficiencies or constraints;
 - e) not be offset by actions of market participants not subject to the inventory regulations.
- 4) Requires the CEC to annually re-evaluate these factors and provide a report to the Legislature concluding whether the regulation meets the cost effectiveness test.
- 5) Establishes a civil penalty, ranging from \$100,000 to \$1 million per day for each day of noncompliance, which the CEC may levy on refiners who fail to comply with the minimum inventory regulations, beginning on the third day following notification.
- 6) Dissolves the Independent Consumer Fuels Advisory Committee (ICFAC), an eight member body tasked with advising the CEC and DPMO on the fuels market and regulatory development. Establishes an Expert Advisory Committee (EAC) to assist the CEC in data analysis, identification of market behaviors, and development of regulations. Requires the EAC to be comprised of six members who either hold an academic appointment in, or demonstrate expertise of, economics or business operations of the transportation fuels market. Establishes cooling off and revolving door protections for members of EAC where no member shall have been employed or otherwise received direct compensation from any oil market participant within a year both preceding and following their appointment.

Requires the EAC to have access to all information submitted to the CEC and DPMO, and that members of EAC shall agree in writing to maintain the confidentiality of such information.

- 7) Updates reporting requirements in the CEC's existing Transportation Fuels Assessment, which is submitted to the Legislature every three years, to include an evaluation of California's marine and port infrastructure and an evaluation of the effects of state regulations on supplies of transportation fuels that may be causing supply constraints.
- 8) Exempts any regulation, guideline, or other standard or decision by the CEC related to their petroleum oversight authority from the California Environmental Quality Act (CEQA), but maintains that any project undertaken pursuant to these CEC actions would still be subject to CEQA.
- 9) Establishes that DPMO's director is the "head of a department," pursuant to Government Code authority, which authorizes the director to investigate and prosecute all matters related to DPMO activities and to inspect all books and records, issue subpoenas, administer oaths, collaborate with other law enforcement entities, and present information to a court, among other powers and duties.

EXISTING LAW:

- 1) Establishes the State Energy Resources Conservation and Development Commission, also known as the CEC, consisting of five members appointed by the governor, and specifies the duties of the CEC. Requires the CEC to assess trends in energy consumption and analyze the social, economic, and environmental consequences of these trends. (Public Resources Code § 25200 et. seq.)
- 2) Establishes the Division of Petroleum Market Oversight (DPMO) as an independent division within the CEC tasked with providing oversight and analysis of the transportation fuels market. Grants DPMO the power to subpoena witnesses, compel testimony, and take evidence, as specified. Treats data provided to DPMO as presumptively confidential and not subject to public disclosure. Requires DPMO to annually publish a (aggregated and anonymized) report on recommendations to improve market performance, and the director shall appear, when requested, before the appropriate Legislative policy committees. (Public Resources Code §§ 25372-25372.4)
- 3) Establishes the Petroleum Industry Information Reporting Act of 1980 (PIIRA). (Public Resources Code §§ 25350 et seq.)
- 4) Requires major oil producers, refiners, marketers, oil transporters, oil producers, pipeline and port operators, and destination facilities to submit certain information to the CEC, as specified. These reports are mandated to be generated annually, monthly, weekly, and daily, depending on the market participant and the specific data requested. Specifies reporting from processes in the oil production supply chain that use renewable feedstock and fuels shall be included. (Public Resources Code § 25354)
- 5) Requires operators of refineries operating in the state that produce gasoline meeting California specifications to submit a report within 30 days of the end of each calendar month

- with certain information, including the max margin of gasoline sold in that month. Requires the CEC within 45 days of the end of each calendar month to post certain information on its internet website. The section is known as the California Oil Refinery Cost Disclosure Act of 2022. (Public Resources Code § 25355)
- 6) Subjects a person who fails to provide information to the CEC, after being notified of the failure, to civil penalties in specified amounts. (Public Resources Code § 25362)
 - 7) Requires that information presented to the CEC is held in confidence by the CEC or aggregated to the extent necessary to ensure confidentiality if public disclosure of the specific data would result in unfair competitive disadvantage to the person supplying the information. (Public Resources Code § 25364)
 - 8) Requires the CEC, upon request, to share confidential information to the Assembly Speaker, Senate Rules Committee, and the appropriate policy committees in the Assembly or the Senate and their staff members, so long as the information is provided in aggregated or other anonymized form, and each person receiving the information agrees in writing to keep the information confidential. Requires that aggregated or otherwise anonymized information disclosed to the Legislature shall be made available to the public no more than quarterly, if requested by the Legislature. (Public Resources Code § 25364 (h))
 - 9) Authorizes the CEC to establish a max margin; which, simplistically, would be the maximum amount a California refiner could earn without incurring a penalty. Requires if the CEC sets a max margin, it *must* set a penalty for any refiner exceeding that max margin. Establishes three tiers of penalty depending on how egregiously the refiner exceeds the max margin. Prohibits the CEC from establishing a max margin and penalty, unless the CEC finds that “the likely benefits to consumers outweigh the potential costs to consumers.” Authorizes the CEC to petition the court to enjoin a refiner from exceeding the max margin. (Public Resources Code § 25355.5)
 - 10) Requires the California State Auditor (Auditor), no later than March 1, 2033, to complete an audit and performance review of the max margin and penalty. Requires the Auditor to make a determination in a report to the Legislature and the CEC, by no later than June 1, 2033, as to whether the max margin and penalty is achieving the intended goal to reduce gasoline price spikes and stabilize the gasoline fuel supply market. Requires the CEC, within 180 days after the issuance of the report, to cease implementing the max margin and penalty, if the Auditor concludes that the max margin and penalty should be terminated. (Public Resources Code § 25355.5 (p))
 - 11) Requires the CEC, in cooperation with the California Department of Tax and Fee Administration (CDTFA), to submit a report to the Legislature, by March 1 of each year that includes a review of the price of gasoline in California and its impact on state revenues for the previous calendar year. Authorizes CDTFA to request from any person certain records required to be maintained and any records in the person’s possession, custody, or control that the CDTFA deems necessary to facilitate the report or to assist the CEC. (Public Resources Code § 25355.7)
 - 12) Requires the CEC, on or before January 1, 2024, and every three years thereafter, to submit an assessment – known as the Transportation Fuels Assessment – to the Governor and the

Legislature that identifies methods to ensure a reliable supply of affordable and safe transportation fuels in California. Requires the CEC to use reasonable means necessary and available to seek and obtain information from any sources for purposes of preparing the assessment and would authorize the CEC to impose a civil penalty if a person fails to timely provide information necessary for preparing the assessment. Requires the CEC and the California Air Resources Board (CARB), on or before December 31, 2024, and taking into account the assessment, to prepare a Transportation Fuels Transition Plan. (Public Resources Code §§ 25371-25371.3)

- 13) Requires every petroleum refinery employer to provide to the Division of Occupational Health and Safety (Cal/OSHA) a full schedule of planned turnarounds for all affected units for the following calendar year, and defines the schedule submitted to be treated as a “trade secret.” Defines “turnaround” to mean a planned, periodic shutdown, total or partial, of a refinery process unit or plant to perform maintenance, overhaul, and repair operations and to inspect, test, and replace process materials and equipment. (Labor Code §§ 7872, 7873)
- 14) Establishes the ICFAC, within the CEC, consisting of six members appointed by the Governor, one member appointed by the Speaker of the Assembly, and one member appointed by the Senate Committee on Rules. Requires ICFAC to advise the CEC and DPMO, and provides ICFAC with access to all the information provided to the CEC and DPMO. Establishes revolving door protections for members of ICFAC where no member – except the representatives from labor and the petroleum fuels industry – shall have been employed or otherwise received direct compensation from any oil market participant within a year both preceding and following their appointment. Requires the executive director of the CEC to ensure any confidential information shared with the members of the ICFAC is subject to a nondisclosure agreement. (Public Resources Code § 25373)
- 15) Requires refiners to report maintenance activities to the CEC under specified timelines, including turnaround, planned, and unplanned maintenance, and specifies that information shall be treated confidentially. Requires refiners to report on inventory drawdown levels, imports, planned purchases, and planned reductions of gasoline and gasoline blending components and other materials during the planned maintenance or turnaround. (Public Resources Code § 25354 (m))
- 16) Authorizes the CEC to regulate – in consultation with the Labor and Workforce Development Agency, labor, and industry stakeholders – the timing of turnaround and maintenance, if such a regulation can protect worker and public health and safety while also minimizing the risk of maintenance-driven supply shortages or price shocks. (Public Resources Code § 25354.2)
- 17) Requires any in-state refineries to report to the CEC at least a year in advance if the refinery intends to permanently shut down, shut down to reconfigure, or sell a refinery. (Public Resources Code § 25354 (p))

FISCAL EFFECT: Unknown. This bill has not received a hearing from a fiscal committee.

BACKGROUND: For more information on California’s oil and gasoline market, recent price fluctuations, and supply impacts see the background documents prepared for the informational

hearings by this committee during the Second Extraordinary Session on September 18 and 19, 2024.

COMMENTS:

- 1) *Author's Statement.* According to the author, “Governor Newsom called for this second extraordinary session to address one goal—reduce gasoline prices for Californians. This effort builds on the foundation laid by last year’s special session legislation, SBX1-2 (Skinner), which established the Division of Petroleum Market Oversight (DPMO). Since SBX1-2’s passage, the California Energy Commission (CEC) has gained critical insights into refiner storage capacity and operations. In September 2023, gasoline prices in California soared to more than \$6.00 per gallon. With enhanced data and oversight, the CEC and DPMO have identified clear trends in price spikes. ABX2-1 aims to protect consumers from surging gas prices by giving the CEC the authority to assess whether implementing minimum inventory requirements and resupply plans can lower average retail fuel prices, boost supply, and reduce market volatility. This common-sense legislation will require oil companies to better plan for refinery shutdowns and supply chain disruptions, ultimately saving Californians billions at the pump.”
- 2) *Technical Amendment Adoption.* This committee received author’s amendments making minor, technical changes that correct drafting errors and add statutory clarity. These amendments will be adopted ahead of the committee hearing as author’s amendments.
- 3) *Regulating Against Price Spikes.* Gasoline prices at Californian pumps have been increasing over time and showing concerning volatility month-to-month, significantly impacting the budgets of Californians. In the last two years – 2022 and 2023 – California had two gasoline price spikes in September and October.¹ These prices were historic for California, topping near or above \$6 per gallon for regular grade retail gasoline. The price spikes were not seen in regions outside the West Coast. Higher prices of gasoline can have crippling effects for residents on fixed or limited incomes, especially those who rely on long commutes to get to work. Higher gasoline prices also take a toll on the overall economy, impacting goods that use gasoline fuels to get to market. According to analysis by the DPMO, the price spike of fall 2023 cost Californians up to \$2.2 billion.²

California is in a period of transition in its petroleum market. Supply is tightening, as demand is declining. These trends are unlikely to subside. Rather, more volatility – not less – is likely if the state does not strategize and appropriately plan for smoothing the transition. During an oversight hearing of the Assembly Committee on Utilities and Energy in May 2024, the CEC presented findings from their work authorized under SBX1-2 (Skinner, Chapter 1, Statutes of 2023). Included in that presentation were data comparing impacts on spot market prices against days of supply for 2022 and 2023. The CEC’s chart showed (in both years) that when petroleum inventories dipped below “15 days of supply,” gasoline prices began to increase. The recommendation at the time to

¹ Figure 9, pg. 14, Bailey, Andrea, et al., *Quarterly Petroleum Supply and Pricing Report, October 2023 Through December 2023*. CEC, Pub # CEC-200-2024-002.

² AB X2-1 “Frequently Asked Questions,” September 18, 2024.

address this observed behavior was to collaborate with industry on solutions to encourage them to “voluntarily” increase supplies and supplement stocks.³

It is unclear the status of those voluntary efforts. Nevertheless, this bill provides the CEC the expressed authority to impose requirements on Californian refiners to not only maintain resupply plans to cover production loss during planned maintenance events, but to also establish minimum inventory requirements of refined fuels on refiners. Such supply obligations are suggested by the author and the administration (as sponsor) as being necessary tools the CEC needs to blunt the price spikes of recent years. The administration points to two recent examples where planned maintenance led to loss of gasoline supply in the state, with resultant increases to prices at the pump.⁴ However, what these new tools will actually look like in practice, and the potential realized savings from this proposal are topics of ongoing dispute.

- 4) *To Build or Not to Build?* One primary area of dispute with this proposal is how the regulations around minimum inventory requirements will or will not result in additional build out of storage infrastructure across the state. This topic was raised extensively throughout the informational hearings held last week by this committee, with the administration resolute that no new infrastructure would be necessary for refiners to meet their minimum inventory requirements; while the refining industry was adamant that it would.

As part of the new reporting requirements under SBX1-2, the CEC receives data from refiners during planned maintenance or turnaround events on inventory drawdown levels, imports, planned purchase, and planned reductions of gasoline and gasoline blending components and other materials. They likewise receive data from refiners, marketers, oil transporters, and oil storers on current inventory volumes. Given this, the CEC presumably has insight into the storage volumes and capacity utilization in the state.

However, most of these data are confidential, and therefore not readily available for the Legislature to analyze. What is public includes W800 reports which track how much motor gasoline and blending components are held by California refiners on a weekly basis, inclusive of those stored on refinery premises and at bulk terminal tanks leased by refiners.⁵ As shown in Figure 1, these data show a cyclical pattern, where refiners hold more inventory in the winter (around 13-14 million barrels in 2022-2024) than in the late summer/early fall (around 10-11 million barrels); with this cyclical behavior more pronounced in Northern California than Southern.

³ Slide 22, “Joint Agencies” presentation, *California’s Petroleum Market & SBX1-2 Implementation Update*, May 15, 2024. <https://autl.assembly.ca.gov/media/1189>

⁴ One in Sept/Oct 2022 where four refiners conducted planned maintenance reducing capacity by >2 million gallons/day; and one in Sept 2023 where the net loss for the entirety of the maintenance event was 60 million gallons. Price spikes were present during both periods. From: ABX2-1 FAQ *Ibid*.

⁵ <https://www.energy.ca.gov/data-reports/reports/weekly-fuels-watch/refinery-stocks>

Figure 1: Gasoline inventories from 2020-2024 for Northern California, with average (dark orange) and 90th/10th percentiles (faint orange lines), and Southern California, with average (dark blue) and 90th/10th percentiles (faint blue lines), shown.⁶

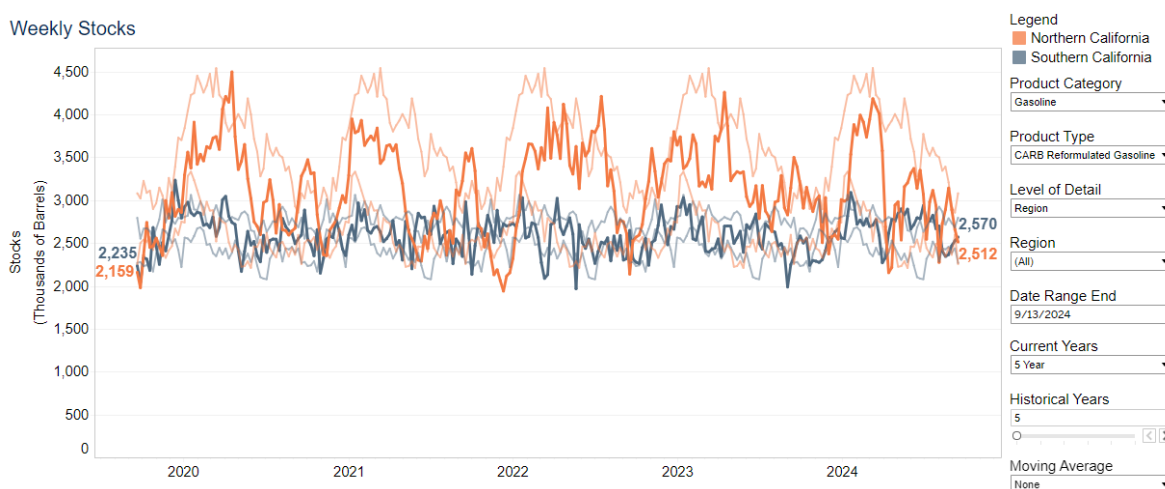


Figure 1 demonstrates that during periods where inventories dip, there is clearly storage capacity available to absorb extra volumes. However, what is not clear from this measure is whether the minimum inventory requirements will only be present to cover these late summer/early fall troughs (essentially turning this cyclical pattern into more of a flat line) or will it result in raising the overall stock amount uniformly (essentially maintaining the cyclical pattern, but everything is raised by a specified amount, even during time of peak inventory). In such circumstances, establishing a requirement that might result in more inventory on hand during periods where inventories are already shown to be high (the peaks in Figure 1), makes it uncertain whether there is enough existing storage capacity to hold that additional supply. While the name, “*minimum* inventory,” is suggestive that it would only be triggered during periods of low inventory – and thus when storage is present – the bill does not guarantee this.

This uncertainty and the disparate positions on this point likely arise from the broad sweep of this measure’s language, which only specifies the CEC can adopt regulations that provide “a process for establishing minimum inventory levels specific for each refiner” without acknowledgement that the requirements may only apply during seasons of low supply or differences in storage capabilities across the different refineries and regions (as shown by the orange curves of Northern California versus the roughly flat line of Southern California).

Regardless, concern has arisen from environmental, environmental justice, labor, and the industry itself about the potential harms – to the environment, to consumer costs, to workforce and public safety – caused by a minimum inventory requirement that results in new tank buildout. The authors have likewise shared it is not the intent of the legislation to require new storage; and the administration has stated such new storage is not required to implement this measure. *Given this seemingly universal consensus, the committee recommends amendments to the bill which clarify new storage is not necessary as a*

⁶ <https://www.energy.ca.gov/data-reports/reports/weekly-fuels-watch/refinery-stocks>; accessed on September 24, 2024.

result of establishing minimum inventory requirements, and that regulatory development of minimum inventory requirements shall maximize the use of existing infrastructure.

- 5) *Safety is Paramount.* As part of its investigatory authority under SBX1-2, DPMO has raised concern around refinery behavior before and after planned maintenance events, such as their recent Market Update which observed: “California is once again seeing a significant spike in gasoline prices and a troubling lack of liquidity on the wholesale spot market **in response to refinery maintenance.**”⁷ [emphasis ours] The Update goes on to note: “In late summer and early fall of 2023, refinery maintenance contributed to a significant price spike that cost Californians up to \$2.2 billion. There was also a major price spike in September and October of 2022, which occurred when planned maintenance at four refineries significantly reduced production.”

However, solutions to mitigate costs by better managing turnaround or planned maintenance events are not without their challenges and tradeoffs. Under SBX1-2, refineries are required to provide the CEC with their planned schedule for turnarounds and maintenance. The statute also authorizes the CEC – in consultation with the Labor and Workforce Development Agency, labor, and the industry – to issue a regulation governing the timing of the maintenance in a way that protects health and safety of workers and the public, while minimizing production losses. At the time of discussions around that bill, it was not clear whether the CEC had or would have much knowledge – beyond the supply of fuels – to inform such a regulation. Concern was raised by the refinery workforce that such a regulation was flipping the goal of turnaround scheduling from one of safety to one of price minimization or price stability. Both the refineries and their workforce have emphasized safety must be paramount, and distrust the ability of the CEC to appropriately balance ensuring safety if faced with a simultaneous price increase. Unfortunately, California has experienced explosions at refineries, including where workers have been harmed. The need for safety – especially for workers and the local community – is imperative. *As such, the committee recommends amendments that specify regulations not only result in increased supply and reduced cost, but minimize impacts or harms to the workforce, the environment, and local communities; and ensure the health and safety of employees and the public are the primary consideration in regulatory development.*

- 6) *Redesigning Committees.* The Independent Consumer Fuels Advisory Committee (ICFAC), an eight-member, stakeholder body created under SBX1-2, is tasked with advising the CEC and DPMO on the fuels market and their various regulatory development. While the Legislature has made appointments to the ICFAC, to date the Committee has not been stood up nor convened. This bill dissolves the ICFAC, and establishes an Expert Advisory Committee (EAC) in its place. The contours of the EAC’s duties are similar – and similarly vague – as the ICFAC; with the main difference being the EAC has access to confidential, non-anonymized data and that all members of the EAC must be experts in the “economics or business operations of the transportation fuels market.” Labor representatives have raised concerns about the changes to the EAC made under this measure, specifically asking for an explicit labor representative to be reinstated

⁷ DPMO, “California Gasoline Market Update and Consumer Advisory,” September 13, 2024. https://www.energy.ca.gov/sites/default/files/2024-09/DPMO_Market_Update_and_Consumer_Advisory_ada_09-13-24.pdf

and to softening of the revolving door clauses for that labor representative, given their likely ongoing employment (or retirement benefits) arising from refineries. Both of these items already are present in the ICFAC structure. *As a result, the committee recommends deleting the EAC and reinstating the ICFAC.* However, the lack of action to date in either appointing or convening the ICFAC speaks to potential structural issues that the change brought forward under the EAC were meant to navigate. *The committee recommends further changes to the ICFAC, including an annual meeting requirement and a provision to ensure labor organizations' dues do not present a disqualification of participant eligibility.*

Finally, the function of either committee is to provide advice to the CEC and DPMO in order to help inform recommendations. The administration reports most of this advice is currently offered by consultants working under contract with the CEC and DPMO; however, as contracted entities, such information is not readily shared with the Legislature. Existing law allows for the CEC to provide, upon request by specified Members and staff of the Legislature, aggregated and anonymized, confidential data. *As a result, the committee recommends an amendment specifying that contracted experts providing analysis and recommendations to the CEC and DPMO are subject to the same legislative disclosure.*

- 7) *Further Guardrails.* As noted above, the exact parameters of the potential regulations developed under this measure are uncertain. This bill currently provides the CEC the authority to adopt regulations that “may provide for, but are not limited to...a process for establishing minimum inventory levels specified for each refiner and for each fuel or blending component type.” It further provides that the regulations may provide for a process to adjust these minimum inventories based on “region, season, and changes in regional or statewide supply and demand.” However, nothing compels the CEC to adopt such considerations as part of its regulatory development. This point has been raised by stakeholders as concerning due to the broad discretion provided to the CEC. To this point, the CEC has acknowledged further analysis and data collection will be necessary to appropriately craft the regulations; much of which will likely be considered confidential. This broad avenue upon which the CEC may act has likely also led to the disparate viewpoints on the impacts of this measure. *As a result, the committee recommends additional guardrails to help guide the regulations in the intended direction; namely, specifying:*

- (a) that minimum inventory requirements may be on the refining regions of the San Francisco Bay and Los Angeles, rather than individual refiners;*
- (b) that refiner size and storage capacity may provide cause for excluding certain refiners from the regulation;*
- (c) that the commission shall establish a predetermined metric based on market conditions for triggering a drawdown of the minimum inventory;*
- (d) a statutory sunset of the minimum inventory regulation authority; and*
- (e) the regulations adopted must provide for various processes which consider maximizing storage, criteria to adjust the requirements, and drawdown provisions.*

8) *Prior Legislation.*

SBX2-1 (Skinner), among its many provisions, updates data reporting requirements from various specified entities along California's oil and gasoline supply chain to the CEC; authorizes the CEC to establish a maximum gross gasoline refining margin (max margin) and penalty on gasoline sold by refiners in the state, pursuant to certain findings; establishes DPMO and ICFAC; and requires various reports and assessments by the CEC to be submitted to the Legislature regarding the current status and future managed decline of transportation fuels. Status: Chapter 1, Statutes of 2023.

SB 1322 (Allen) required the CEC to collect specified pricing data from each oil refinery operating in the state. Status: Chapter 374, Statutes of 2022.

SB 448 (Leno, 2013) would have required the CEC to collect and analyze specific information regarding petroleum pricing, establish the Motor Vehicle Fuel Market Advisory Committee to provide subject matter expertise on fuel pricing, and include specified recommendations regarding its findings, including an analysis of potential market manipulation in the Integrated Energy Policy Report. Status: Vetoed.

SB 1444 (Holmdahl) established the PIIRA which requires specified monthly and annual reporting requirements for certain members of the petroleum industry and quarterly and annual reporting of the CEC. The bill includes confidentiality protections for the data submitted so as to prevent unfair competitive disadvantage. Status: Chapter 1055, Statutes of 1980.

REGISTERED SUPPORT / OPPOSITION:

Support

Alliance for Community Empowerment
California Nurses Association
California State Council of Service Employees International Union (SEIU California)
City of Redondo Beach
Consumer Protection Policy Center/usd School of Law
Consumer Watchdog
Consumers for Auto Reliability & Safety
Los Angeles Cleantech Incubator
Office of Chairwoman Nora Vargas San Diego County Board of Supervisors
Orange County Board of Supervisors - Supervisor Vicente Sarmiento
Udw/afscme Local 3930
West Hollywood/hernan Molina, Governmental Affairs Liaison

Support If Amended

Asian Pacific Environmental Network (APEN)
Campaign for A Safe and Healthy California, Sponsored by Environmental and Health Organizations
CEJA Action
Center for Biological Diversity
Center on Race, Poverty & the Environment

Communities for A Better Environment
Labor Network for Sustainability
Natural Resources Defense Council (NRDC)
Physicians for Social Responsibility - Los Angeles
Physicians for Social Responsibility - San Francisco Bay Area Chapter
The Climate Center
Union of Concerned Scientists

Oppose

California Chamber of Commerce
California Fuels and Convenience Alliance
California-Nevada Conference of Operating Engineers
County of Kern
District Council 16, International Union of Painters and Allied Trades
District Council 36, International Union of Painters and Allied Trades
Fresno County Board of Supervisors
International Brotherhood of Boilermakers, Western States Section
State Building & Construction Trades Council of California
Valley Industry and Commerce Association (VICA)
Western States Petroleum Association

Concern

350 Bay Area Action
Earthjustice
East Yard Communities for Environmental Justice
Healthy Martinez
Sierra Club California

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