

Date of Hearing: March 27, 2023

ASSEMBLY COMMITTEE ON UTILITIES AND ENERGY
Eduardo Garcia, Chair
SBX1 2 (Skinner) – As Amended March 20, 2023

SENATE VOTE: 30-8

SUBJECT: Energy: transportation fuels: supply and pricing: maximum gross gasoline refining margin

SUMMARY: Mandates extensive data reporting to the California Energy Commission (CEC) from various specified entities along California's oil and gasoline supply chain. 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 a new division and advisory committee at the CEC, 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. Specifically, **this bill:**

- 1) Expands and significantly updates both the Petroleum Industry Information Reporting Act of 1980 (PIIRA) and the California Oil Refinery Cost Disclosure Act of 2022, which include reporting requirements to the CEC for all participants in the oil production supply chain, including refiners, marketers, importers, oil transporters, oil storers, oil producers, pipeline and port operators, and destination facilities. 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.
- 2) Increases the civil penalty the CEC can levy against a person that fails to supply the specified data from \$500-\$2,000 per day to \$5,000-\$20,000 per day, up to a maximum of \$500,000 per submission. Additionally allows the CEC to petition a court for an order compelling the person to provide the information.
- 3) 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.
- 4) Authorizes the CEC to establish a max margin, which is the maximum amount of the gross gasoline refining margin. The gross gasoline refining margin is defined as the average wholesale rack price of gasoline minus the low carbon fuel standard and cap-at-the-rack program costs minus the refiner's crude oil acquisition costs and refined gasoline import

costs; simplistically, it's a measure of the refiner's profit. The max margin would then be the maximum amount a California refiner could earn without incurring the penalty.

- 5) 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.
- 6) 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." Requires the CEC to consider, at a minimum:
 - a) Whether it is likely that the max margin and penalty will lead to a greater imbalance between supply and demand in the California transportation fuels market than would exist without the max margin and penalty.
 - b) Whether it is likely that the max margin and penalty will lead to higher average prices at the pump on an annual basis than would exist without the max margin and penalty.
 - c) Whether case-by-case exemptions from the max margin will be sufficient to ensure that individual refiners have an opportunity to demonstrate the need for a greater margin before they make decisions about production.
- 7) Authorizes the CEC to petition the court to enjoin a refiner from exceeding the max margin.
- 8) Requires that collected penalties shall be deposited in the Price Gouging Penalty Fund in the State Treasury to be used, upon legislative appropriation, to "address any consequences of price gouging on Californians."
- 9) Authorizes the CEC to rescind or adjust the max margin and penalty to ensure that a sufficient, affordable, and fairly priced supply of gasoline is available to Californians.
- 10) Requires the CEC to consider a refiner's request for an exemption from the max margin, as provided. Requires a refiner seeking an exemption to file a statement under penalty of perjury setting forth the basis of the request for exemption. By requiring the statement to be filed under penalty of perjury, this bill expands the scope of the crime of perjury, thereby imposing a state-mandated local program.
- 11) 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.

- 12) 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. Mandates CDTFA records requests shall be provided within 30 days of notice; failure to provide records may result in the CEC imposing a civil penalty, up to a maximum of \$10,000 per day.
- 13) Authorizes the Attorney General (AG) to request from the CEC or CDTFA, or for the agencies to provide, any information collected pursuant to the oil production supply chain data reporting and CDTFA records collection provided in this bill. Specifies any data shared shall be treated confidentially by the AG.
- 14) Requires the CEC, on or before January 1, 2024, and every three years thereafter, to submit an 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.
- 15) Establishes the Division of Petroleum Market Oversight, within the CEC, as an independent authority whose director is appointed by the Governor, confirmed by the Senate, and staffed with economists, experts in the fuels market, and legal investigators. The Division shall provide oversight and analysis of the transportation fuels market, and provide guidance and recommendations to the CEC on the various reports and data gathering it will conduct pursuant to this bill. Empowers the Division with subpoena power, and allows confidential referrals of potential violations of law to the AG at any time. Treats data provided to the Division as presumptively confidential and not subject to public disclosure. The Division shall publish an annual (aggregated and anonymized) report on recommendations to improve market performance, and the director shall appear, when requested, before the appropriate Legislative policy committees.
- 16) Establishes the Independent Consumer Fuels Advisory Committee (Committee), 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. This bill requires the Committee to advise the CEC and the Division. Provides the Committee with access to all the information provided to the CEC and Division. Establishes revolving door protections for members of the Committee 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 Committee is subject to a nondisclosure agreement.

- 17) Requires the operators of refineries to report additional information, including the net gasoline refining margin per barrel of gasoline sold in that month. Requires the CEC to post on its internet website certain information related to the net gasoline refining margin.
- 18) 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.
- 19) 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.
- 20) 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.

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 CDTFA, as of July 1, 2017, within the Government Operations Agency, vested with duties, powers, and responsibilities of the Board of Equalization, except those established by, and specified in, the California Constitution. (Government Code § 15570 *et seq.*)
- 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, and oil storers to submit certain information to the CEC, as provided. (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 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)
- 9) Defines “writ of mandate” as a document issued by any court to any inferior body or person, including an administrative agency, to compel the performance of an act which the law specially enjoins. (Code of Civil Procedure § 1085)
- 10) Requires that a statute that limits the right of access to the meetings of public bodies or the writings of public officials and agencies be adopted with findings demonstrating the interest protected by the limitation and the need for protecting that interest. (California Constitution Article I, § 3)

FISCAL EFFECT: According to the Assembly Committee on Appropriations, this bill will result in significant ongoing costs to the CEC, in the millions of dollars annually, to develop rules and review data submissions; to establish and administer the Advisory Committee and the Division; to exercise its new authority to set a maximum margin; and to administer a penalty, if created. The CEC estimates some of these responsibilities to require 34 new positions and contracting, at an annual cost of \$9.4 million. (General Fund or special fund).

Additionally, significant ongoing costs to CDTFA to develop a processes to request information from taxpayers involved in gasoline sales, collect and analyze the information, and share the information with other agencies. CDTFA estimates annual costs of \$50,000 to \$250,000 related to these activities (General Fund). One-time cost to CARB, working with the CEC, to complete the Transportation Fuels Plan. CARB estimates this work will entail contracting costs of \$1 million to complete this work (Cost of Implementation Account). Absorbable costs to the Labor and Workforce Development Agency to consult with the CEC on its consideration of ways to manage refinery turnarounds and maintenance and, possibly, develop related regulations. One-time cost in 2032-33 of an unknown, but significant amount, likely in the hundreds of thousands

of dollars, for the State Auditor to conduct a performance review of the maximum gross refining margin and penalty, only if the CEC sets such a margin and establishes such a penalty (General Fund).

Finally, penalty revenue of an unknown, but potentially significant amount to the Price Gouging Penalty Fund, only if the CEC sets a maximum gross refining margin penalty.

BACKGROUND: For information on California’s oil and gasoline market and recent price fluctuations see the background document prepared for the First Extraordinary Session Informational Hearing by this committee on March 22, 2023.

COMMENTS:

- 1) *Author’s Statement.* According to the author, “In 2022, oil companies hauled in more than \$200 billion in profits. And while oil companies were raking it in, Californians were paying for it in record high gas prices — \$2.61 per gallon higher than the national average. We were charged those sky-high prices even though the cost of crude oil was down and there were no changes to state taxes, fees, or regulations. To push oil companies to treat California consumers fairly, SBX 1-2 includes the strongest, most effective transparency and oversight measures in the nation so we can look under the hood and hold oil companies accountable for high gas prices. SBX 1-2 includes a first-of-its-kind independent watchdog that would monitor California’s petroleum market to ensure the industry plays by the rules. The division would have access to new information required by law, subpoena power to compel data and records that would reveal shady practices, and direction to refer violations of law to the Attorney General for prosecution. Additionally, the bill includes a price-gouging penalty that would fine oil companies for making excessive profits off the backs of Californians. Ideally, the penalty will never even be used — like with other good policy, its existence may motivate oil companies to keep prices down to avoid being penalized. But if oil companies do engage in price gouging, then SBX 1-2 will protect Californians from fossil fuel businesses that pad their profits at our expense.”
- 2) *Ensuring Confidentiality in Tracking the Supply Chain.* Gasoline begins its journey to consumers as crude oil at petroleum refineries and then moves through stages of refining, transport, storage, and blending until final delivery to retail fueling stations. The inputs into the system could be imported or domestic crude; or, when refinery operations are down, imported finished gasoline. The refined or imported product then travels along various transit—pipeline, barge, ship, rail or truck—before reaching fuel terminals and eventually the end consumer. The oil and gasoline market consists of an assortment of entities, some vertically integrated companies, global shippers, marketers, traders, and retailers that vary in size from small operations to national chains. But what seems to universally characterize the market is its limited transparency.

This bill proposes to provide significantly more data reporting from what seems like the entire ecosystem of the transportation fuels market. Expanding access to data by experts, especially those in the new Division at the CEC, the AG, and other state agencies, should help ensure the state has enough transparency to better address supply and pricing inconsistencies. However, there is some dispute as to the terms of the data that is required to be reported.

Should this bill pass, the Legislature should continue to monitor its implementation to ensure the data requested and the expanded list of reporting entities in this bill are proving beneficial. More importantly, the Administration and Legislature will need to monitor the use of confidential data and whether its use is resulting in harm to consumers. PIIRA confidentiality provisions require limited access to aggregate data by the public in order to protect against competitive disadvantage and market manipulation. With a declining number of refineries (now down to 11 that refine California-specific gasoline)—and as recently demonstrated by the AG’s pending litigation against two market traders who are alleged to have manipulated the spot market to their benefit—there is a great need to proceed with caution in divulging confidential data. While this bill attempts to strike the appropriate balance, the expanded reporting requirements, public disclosure, and expanded access to the data (including with nondisclosure agreements) likely require future scrutiny.

- 3) *An Independent Division?* This bill establishes a new Division of Petroleum Market Oversight, within the CEC, as an independent authority whose director is appointed by the Governor, confirmed by the Senate, and which is staffed with economists, experts in the fuels market, and legal investigators. This Division is characterized by the proponents of this bill as a new “watchdog” over the oil and gasoline industry. Such a Division has been called for during many state reviews of oil and gasoline price volatility, most recently under the Petroleum Market Advisory Committee, which highlighted the need for more expert analysis (via dedicated staff) of the transportation fuels market. However, it is unclear the meaning—or even the implications of—the Division’s designation as an “independent authority” within the CEC.

Perhaps an analogous administrative office is the Public Advocate’s Office (PAO), established decades ago as a ratepayer advocate within the California Public Utilities Commission (CPUC).¹ Current statute lists PAO as “independent” of the CPUC, but it took decades of statutory changes to establish its independence and separate its operating budget from the CPUC’s. It is unclear what the intention or implications of designating the new Division as “independent” might be, and it remains to be determined how independent they will be, or how independent the Legislature wishes them to be.

¹ PUC § 309.5

Additionally, the new Division is meant to be staffed with competitive market economists and experts in the fuels supply chain. While the Administration has noted its commitment to stand the Division up as quickly as possible, it is likely to take some time for the Division to be staffed given the pace of state hiring. Moreover, it is unclear how successful such a Division might be at recruiting and retaining such a specialized workforce within the constraints of civil service hiring, when the skillsets the employees would have would be very attractive, and likely garner higher wages, in the oil and gasoline industry. The Legislature should be mindful of these challenges as they undertake review of subsequent budget authorizations for this new Division.

- 4) *Limitations and Exemptions Aplenty.* This bill considers any regulations, or amendments to regulations, adopted to implement all the reporting by oil market participants, CEC and CDTFA data acquisitions, max margin and penalty determinations, and all other provisions of the Chapter as emergency regulations, remaining in effect for 2 years. The bill additionally specifies those provisions are self-executing, and do not require any regulation to be in effect. The bill also exempts all CEC contracts to implement the Chapter from Department of General Services' review, and State Contracting Manual or Public Contract Code compliance.

It is common for the Legislature to authorize, and for state agencies to adopt, emergency regulations in response to a situation that calls for immediate action to avoid serious harm to public peace, health, safety, or general welfare. Because of this, the emergency rulemaking process is substantially abbreviated compared to the regular rulemaking process. Emergency regulations still require an Office of Administrative Law review, however the overall regulation development and public participation requirements are much reduced. Emergency regulations do not exempt an agency from the regular rulemaking process; rather, regular rulemaking is required to be completed while the emergency regulations are in place.

The Administrative Procedures Act (APA) was created by the Legislature to increase public participation in the rulemaking process, provide public access to agency written rules, and to increase clarity and reduce the complexity of regulations. While there are certainly situations that call for APA exemptions or emergency regulations—including, many would argue, quickly acting to protect Californian consumers from rising gasoline prices—the Legislature should consider whether such regulatory action imposes a significant requirement on the public. This bill, in not only requiring extensive confidential reporting from entities in the oil supply chain but also in developing a max margin and penalty, does establish rules that impact the livelihood and welfare of most Californians. The Legislature should be mindful of the limited public participation inherent in the emergency regulation development, especially in light of the abbreviated timeline for legislative action on this bill, and consider opportunities to provide for additional public engagement on this measure's impact.

- 5) *Definitional Mismatch.* The definition of “gross gasoline refining margin” as currently defined in statute equals the difference, expressed in dollars per barrel, between the average price of wholesale gasoline sold by a refiner in the state and the average price of crude oil received by the refinery.² This bill does not propose changing this definition. Rather, this bill adds a second definition, the “gross gasoline refining margin excluding state program costs” which equals the difference, expressed in dollars per barrel, between the average price of wholesale gasoline sold by a refiner in the state and the average price of crude oil received *and refined gasoline imported* by the refinery, less state program costs (low carbon fuel standard and cap-at-the rack costs). The first measure of “gross gasoline refining margin” is reported to the CEC by refineries; while the second is calculated by the CEC on a monthly basis based on data received. It is unclear why imported gasoline costs are part of the equation for the CEC calculation of “gross gasoline refining margin,” but not the value as reported by the refiners. Such a difference feels easily resolvable, but without clean-up could lead to confusion; especially since both gross gasoline refining margins, as reported by the refineries and the one calculated by the CEC, are required pursuant to this bill to be published on the CEC’s website within 45 days of the end of each calendar month. Without adjusting these definitions, the two values may be inaccurately represented as divergent.
- 6) *Missing Public Data?* This bill amends provisions of the California Oil Refinery Cost Disclosure Act of 2022, which mandates aggregation and public release of some of the refinery data reported to the CEC.³ However, this bill amends the subdivision of the Disclosure Act that lists the various refinery reporting requirements, without making a similar change to the subdivision that lists which of those reporting requirements should be aggregated and publicized. The consequence of this is to limit public release of information that was just recently required to be public through a measure chaptered last year. It is unclear whether this omission is intentional or inadvertent, but should require additional consideration regarding the merits of limiting public access to these data.
- 7) *How to Evaluate Consumer Benefits?* This bill authorizes the CEC to establish a “max margin,” which, simplistically, is the maximum amount a California refiner could earn without incurring the penalty. This bill requires if the CEC sets a max margin, it *must* set a penalty for any refiner exceeding that max margin; and establishes three tiers of penalty depending on how egregiously the refiner exceeds the max margin.

However, the bill does attempt to provide some guardrails against the CEC setting of the max margin and penalty, by prohibiting 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.” Which “benefits” the CEC will weigh in determining this calculation are unclear, as the bill authorizes the CEC to consider “all factors it deems

² PRC § 25355

³ PRC § 25355 (c)(5)

relevant.” But the CEC has three criteria it must consider, at minimum, in such an evaluation:

- a) Whether it is likely that the max margin and penalty will lead to a greater imbalance between supply and demand in the California transportation fuels market than would exist without the max margin and penalty.
- b) Whether it is likely that the max margin and penalty will lead to higher average prices at the pump on an annual basis than would exist without the max margin and penalty.
- c) Whether case-by-case exemptions from the max margin will be sufficient to ensure that individual refiners have an opportunity to demonstrate the need for a greater margin before they make decisions about production.

For some of these metrics, the barrier to an affirmative conclusion appears low. For instance, the CEC evaluating whether the case-by-case exemptions from the max margin will be sufficient. This is asking the regulatory agency that produced the regulations to likewise determine whether those regulations are sufficient; this seems to almost guarantee a positive finding. It is also unclear how effective the evaluation for “higher average prices at the pump on an annual basis” will be at ensuring real-time or regional prices at the pump aren’t impacted by the max margin and penalty, as this metric would permit very high prices during certain parts of the year (such as the summer) or locations, so long as the prices are low enough in other months or locations to average out. The Legislature may wish to review these factors earlier than called for by the State Auditor evaluation, as the impacts of the penalty on Californians would be largely determined by what the CEC considers.

- 8) *What is the Advisory Committee’s Purpose?* This bill establishes an Independent Consumer Fuels Advisory Committee within the CEC, consisting of eight members some with specified backgrounds. This bill requires the Committee to advise the CEC and the Division, and provides the Committee with access to all the information provided to the CEC and Division. However this bill prescribes no duties or functions to the Committee, except to note the CEC will prescribe them...eventually. It is unclear how the CEC hopes to utilize this Committee, which may make appointments to the Committee either challenging or unfocused. This bill reasonably establishes revolving door protections for members of the Committee 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. Concerning, the representatives of the oil industry and labor are not subject to these protections. It is fair to be concerned about the reduced likelihood of stakeholder appointments from industry, if those representatives are required to give up their careers for years at a time to serve on the Committee. However, it is worth scrutinizing whether confidential information related to competitors should be disclosed to oil industry experts who happen to be serving on the Committee. Even with

air-tight nondisclosure agreements, there is potential for information disclosed to the Committee to influence future business decisions, to the financial benefit of some.

It may be worth the Legislature weighing splitting the Committee into two distinct groups: an academic (and other) expert committee to provide rigorous market analysis and data crunching for the Division, with unrestricted access to data, confidential treatment of all data, and revolving door policies for *all* its members; and a stakeholder panel that includes all the representatives outlined for the Committee in this bill, without revolving door policies, and with access to more aggregated and anonymized data that can still provide insight and ground-truthing to Division decisionmaking. Such a split in Committee makeup was suggested⁴ at the recent informational hearing on the oil and gasoline market held by this committee on March 22, 2023, and bears further Legislative consideration.

REGISTERED SUPPORT / OPPOSITION:

Support

American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO
California State Association of Electrical Workers
CalPIRG, California Public Interest Research Group
Center for Biological Diversity
Center on Race, Poverty & the Environment
City of Mountain View
Coalition of California Utility Employees
Comite Civico Del Valle
Consumer Watchdog
Elected Officials to Protect America - California
Environment California
Fullerton; City of
State of California Attorney General
Western States Council Sheet Metal, Air, Rail and Transportation

Oppose

African American Farmers of California
American Chemistry Council
Bay Planning Coalition
Building Owners and Managers Association
California Business Properties Association
California Business Roundtable
California Chamber of Commerce
California Delivery Association
California Fuels and Convenience Alliance

⁴ By Professor Severin Borenstein from the Energy Institute at Haas School of Business at the University of California, Berkeley.

California Manufacturers & Technology Association
California Taxpayers Association (CALTAX)
Carson Chamber of Commerce
Central Valley Business Federation
Coastal Energy Alliance
County of Kern
El Dorado County Chamber of Commerce
El Dorado Hills Chamber of Commerce
Elk Grove Chamber of Commerce
Folsom Chamber of Commerce
Greater Coachella Valley Chamber of Commerce
Greater Conejo Valley Chamber of Commerce
Inland Empire Economic Partnership
International Warehouse Logistics Association
Kern Citizens for Energy
Kern County Taxpayers Association
Lincoln Area Chamber of Commerce
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Business Federation (BIZ-FED)
Los Angeles Latino Chamber of Commerce
Milk Producers Council
Murrieta Wildomar Chamber of Commerce
NAIOP California
Orange County Business Council
PCI West-chapter of The Precast/prestressed Concrete Institute
Rancho Cordova Area Chamber of Commerce
Rocklin Area Chamber of Commerce
Roseville Area Chamber of Commerce
Santa Barbara County Taxpayers Association
Santa Barbara South Coast Chamber of Commerce
Shingle Springs/Cameron Park Chamber of Commerce
Simi Valley Chamber of Commerce
Southern California Leadership Council
Southwest California Legislative Council
State Building and Construction Trades Council of Ca
Sustainable Ag and Energy (SAGE) Monterey
Torrance Area Chamber of Commerce
Tri County Chamber Alliance
Ventura County Taxpayers Association
West Ventura County Business Alliance
Western Independent Refiners Association
Western States Petroleum Association
Yuba Sutter Chamber of Commerce

Other

Asian Pacific Environmental Network
Center for Race, Poverty, and The Environment

Communities for A Better Environment
Physicians for Social Responsibility - Los Angeles
Physicians for Social Responsibility - San Francisco Bay Area Chapter
Sierra Club California
Union of Concerned Scientists

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