From: Tomalty, Sarah, BP

Sent: Monday, June 13, 2022 11:29 AM

To: naesb <naesb@naesb.org>

Subject: June 2 WGS Contracts Subcommittee request for comments

Hello Keith and Jonathan,

This note is in response to your request during the June 2 meeting for comments by June 14 on the product name to support purchase and sale transactions related to sustainably produced natural gas.

bp appreciates NAESB’s work in developing industry standard contracts and plans to participate in the upcoming discussions. As an initial matter, however, bp is concerned about the name, “responsibly sourced gas.” There has not yet been consensus within the industry on what to call gas that is produced with more sustainable methods. “Responsibly” has no common, accepted definition and is fraught with subjective interpretation. The goal should be objective assessment based on common, transparent standards and mitigation of the risk of perceived greenwashing of a product that has the potential to help decarbonize natural gas in the energy transition.

The name “responsibly sourced gas” was trademarked (and then the trademark was later removed) by Project Canary. We are concerned about the optics of favoring one certifier’s chosen moniker (and perhaps giving them a competitive advantage) and believe the name should reflect what the producers and their customers are calling the product in commercial discussions. It seems as if the industry has already passed by several names (e.g. differentiated natural gas and responsibly sourced gas) and now appears to be settling on the broader name, “certified natural gas.”

We request that you either change the name to certified natural gas or refrain from naming it so different industry members can use their own moniker. Also, as a practical matter, the abbreviated form ”RSG” is too close to “RNG” and causes confusion.