

September 25, 2018

Environmental Protection Agency & National Highway and Traffic Safety Administration:
Hearing on the proposed Safer Affordable Fuel-Efficient Vehicle Rule (SAFE)

Thank you for the opportunity to appear today to discuss the joint agency proposed Safer Affordable Fuel-Efficient Vehicle Rule. My name is Chris Bliley and I am the Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the leading trade association for the ethanol industry, and we are proud to represent 100 producers, 89 companies involved in the ethanol production process, and tens of thousands of ethanol supporters around the country. We are working to bring consumers better choices at the fuel pump, grow America's economy, and improve the environment for future generations.

Today, ethanol is blended in 98 percent, up from 97 percent, of our fuel supply, meeting more than 10 percent of our motor fuel needs. And because of ethanol's high-octane value, it allows for better performing engines and greater fuel efficiency.

The American ethanol industry stands ready to move America forward. With a stable policy and access to drivers, we believe we can deliver low-carbon, low-cost, high-performing, sustainable vehicle fuel solutions.

Growth Energy has been a leader on the need for higher octane, midlevel ethanol blends, first submitting a proposal for a 100 RON, E30 fuel nearly seven years ago when the agencies first developed the joint standards for light-duty vehicles. The science supporting the benefits of a high-octane fuel, and specifically a midlevel ethanol blend in the E25-E30 range, in conjunction with a high compression ratio engine is not new, and has been well-explored by the national laboratories, automobile manufacturers, and other scientific institutions. Ethanol has a very high-octane number, has a lower carbon content than the gasoline components it replaces, and has many other benefits that assist in combustion to increase engine efficiency and reduce both greenhouse gas and tailpipe criteria pollutant emissions.

Specifically, we would urge EPA and NHTSA to make a number of changes to encourage and remove regulatory barriers to the adoption of high octane, midlevel ethanol blends:

1. EPA should approve a high octane, midlevel ethanol fuel for vehicle certification such as the 100 RON, E30 that we first proposed in 2012.
2. EPA should require a minimum octane standard. Higher octane fuels give automakers greater flexibility to meeting standards however they may be set.
3. EPA should correct its fuel economy formula to encourage the use of midlevel ethanol blends. We would urge that the R-Factor be updated and appropriately adjusted.

4. NHTSA and EPA should work together to re-establish credits for flex-fuel vehicles or at a minimum look at some of the newest data, particularly out of California on alternative fuel refueling.
5. Finally, I would reiterate the call on EPA to grant RVP relief for all ethanol blends above 10 percent. It makes no sense why higher ethanol blends should be restricted from the market for 3 months because of a 30-year old regulation.

Thank you for your consideration and we look forward to working with you on fuel solutions to achieve meaningful vehicle efficiency gains.