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March 29, 2019

My name is Emily Skor, and I am the CEO of Growth Energy, the world's largest renewable fuel organization. We represent 100 member plants which produce more than 8.3 billion gallons of ethanol, and I'm here to share our strong support for lifting summertime Reid Vapor Pressure (RVP) restrictions on E15. We applaud EPA's commitment to implementing this vital rule before June 1st, and urge the agency to work expeditiously to meet that goal.

Growth Energy has led the effort to expand consumer access to higher ethanol blends like E15 since our petition was approved in 2011. Finalizing this rule will punctuate 10 hard years of work to provide consumers with uninterrupted access to a cleaner, lower-cost option at the fuel pump. It is a critical milestone for rural America, who rallied behind the president's promise to unleash "the power of E15 to fuel our country all year long."

Eliminating this barrier promises to unlock an estimated 1.3 billion gallons of new annual ethanol demand. Over time, that added demand could grow to seven billion gallons, lending an economic lifeline to rural families.

This fix also will provide relief to nearly 1,800 retail stations across 30 states currently offering E15 – and open new opportunities for more than 3,500 sites with retailers seeking to offer their customers a lower-cost, higher-octane option.

For motorists, the value proposition of E15 is clear. Drivers typically save up to 10 cents per gallon, while E15's superior octane rating provides better engine performance.

The value to our planet is equally compelling. E15 is a cleaner fuel that reduces evaporative emissions and greenhouse gas emissions. It replaces toxic fuel additives associated with cancer, asthma, and smog.

Finally, we ask you to carefully consider our written comments. These comments will provide a detailed assessment of the proposed changes in the market for Renewable Identification Numbers, or RINs. It is vital that any RIN market changes adopted by the agency do not tilt the market in favor of oil refiners and away from those retailers who seek to deliver a cleaner, more affordable biofuel blend to consumers.

Across the heartland, more than 200 biofuels plants support their communities, and these plants are under incredible strain. Many have already shut their doors or idled production in recent months. The recent flooding across the Midwest has only exacerbated these tough times, not to mention the 2.6 billion gallons lost to small refinery exemptions.

With year-round E15, EPA has the opportunity to give American farmers and producers the ability to grow greater demand and expand market access for their homegrown fuel.

We thank EPA for following through on the president's commitment to E15 year-round, but now it's time to drive it home for our farmers, producers, and drivers all across the country.