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GrowthEnergy.org

May 8, 2019

The Honorable Ann Begeman
Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Patrick Fuchs
Vice Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

The Honorable Martin Oberman
Commissioner
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Chairman Begeman and members of the Surface Transportation Board:

Growth Energy is the world's largest association of biofuel producers, representing 100 U.S. plants that each year produce more than 8 billion gallons of ethanol; 89 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more jobs, sustain family farms, and drive down the costs of transportation fuels for consumers.

Today, ethanol is blended into 98 percent of the nation's gasoline from coast to coast. We continue to support and rely on a strong rail system to ensure that our members' products can be transported safely and efficiently to all transportation fuel markets. In fact, nearly 70 percent of all ethanol is shipped by rail with our industry shipping more than 300,000 rail cars each year.

As such, we commend the Board for continuing its examination of the fairness and reciprocity of increasing demurrage and accessorial fees imposed on ethanol producers and other rail shippers. Railroads raised more than \$1.4 billion in revenue from these fees alone. We believe these fees go far beyond what is necessary to ensure a strong and efficient rail system and is a disguised effort to increase

rates beyond the normal price structure. These fees should not function as billion-dollar revenue streams for the railroads. At a minimum, the STB should consider policies that ensure reciprocity for shippers, particularly when issues arise that are the fault of the railroad, not the shipper. Further, there is currently little recourse for shippers to prove their innocence when railroads are at fault. The STB should correct this imbalance. While some railroads generate credits when they are at fault, the revenue they receive from these increased fees far outweigh the value of the credits and does not appropriately incentivize the railroads to be efficient with our members assets.

Because our products are a vital part of the national fuel supply, anything that further increases the costs borne by biofuel producers and marketers ultimately hurts the American consumer with potentially increasing costs at the fuel pump.

Thank you for your continued oversight on these important issues that affect rail customers. Growth Energy and its members are happy to provide you with any additional information you may need.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley". The signature is stylized and cursive.

Chris Bliley, Vice President of Regulatory Affairs