

September 13, 2019

The Honorable Paul Tonko  
Chairman  
House Energy and Commerce Subcommittee on  
Environment and Climate Change  
Washington, DC 20515

The Honorable Bobby Rush  
Chairman  
House Energy and Commerce  
Subcommittee on Energy  
Washington, DC 20515

Dear Chairman Tonko and Chairman Rush:

Thank you for the opportunity to provide comments regarding the Committee's plan to provide a 100 percent clean economy by 2050. I appreciate the ability to provide our thoughts and perspectives on how to best achieve this goal. Below you will find our answers to the Committee's proposed questions.

**1. What are the key policy, regulatory, and market considerations that should inform the development of comprehensive climate legislation? Please provide specifics.**

Our primary concerns as you develop your plan are how we can best utilize biofuels like ethanol to further reduce carbon emissions in the U.S. economy. As you look to reduce the carbon intensity of the transportation sector, biofuels can continue to play a key role in this transition. They are lower in carbon than traditional petroleum fuels, and so with every drop they are reducing carbon in our nation's transportation fuel system. Additionally, higher octane, midlevel blends allow automakers to produce smaller, higher compression engines that increase efficiency and even further reduce greenhouse gas emissions. We strongly encourage you to protect and undertake policies that will make biofuels a key component in ensuring that the vehicles of today and into the future, use lower carbon fuels. The Renewable Fuel Standard (RFS) has been one of the most successful carbon reducing programs to date. The program requires increasing levels of renewable fuel blending each year – renewable fuels which must clearly demonstrate meaningful greenhouse gas reductions. The program also continues to encourage innovation by providing incentives for cellulosic biofuel production as well. The Committee should also examine policies that may increase the octane level of future fuels. Higher octane fuels, such as those found in midlevel blends, can be used by automakers to make engines more efficient and reduce not only greenhouse gas emissions, but harmful air toxics as well.

**2. Please describe any innovative concepts for climate policy design, including both sector-specific and economywide measures, that you believe the Committee should consider.**

We recommend you keep the Renewable Fuel Standard intact and ensure EPA's proper management of the program, and that you look at policies that will help encourage automakers to

make vehicles that take advantage of high octane fuels like ethanol. These two policy items will help provide a robust pathway to utilize vehicle technologies to ensure liquid transportation fuels can further help reduce carbon emissions.

3. **If you work in, advise, or are familiar with sectors that are particularly challenging to decarbonize, have you identified any effective (and scalable) solutions that should be included in comprehensive climate legislation?**

Ethanol has further reduced its carbon footprint through years of industry manufacturing and efficiency improvements – as well as improvements in the technology and farming practices used to grow feedstocks. It is our recommendation that any plan incentivize farmers to use up to date farming and production practices, thereby further reducing the impact of biofuels.

4. **If your organization has adopted carbon pollution reduction goals, how have those goals – or your plans to meet those goals – evolved over the last decade?**

Our primary goal is to ensure that federal policies provide a stable, predictable marketplace for ethanol in the United States. We strongly support policies, like the Renewable Fuel Standard, that provide a clear pathway to encourage innovation and market uptake of products that lower carbon emissions.

5. **If applicable, what actions has your organization already taken, or do you plan to take, to reduce carbon pollution?**

Our plant members proudly produce vehicle fuel that reduces carbon emissions by 39-43 percent when compared to petroleum gasoline, according to Department of Energy and the U.S. Department of Agriculture. Additionally, some plants are using and further developing cellulosic biofuels that further reduce GHG emissions by more than 80 percent compared to fossil fuels. Our industry will continue to innovate and provide lower carbon fuels into the transportation market.

6. **What have been the challenges or barriers to making meaningful carbon pollution reductions, and how have you responded to those challenges or barriers?**

The biggest challenge we have faced is erratic management of the RFS by the EPA. With a properly managed RFS and a way to incent higher octane fuels in vehicles, you can see even greater carbon emission reductions from biofuels. In particular, EPA should not be able to hold up innovative cellulosic biofuel pathways for companies that take risks to find new ways to produce low carbon biofuels.

7. **How can the Federal Government assist you in reducing carbon pollution?**

The most important things they can do are providing a consistent and stable RFS and incentives – either through vehicle efficiency rules or legislation – that encourage high octane vehicles.

8. **Are there any additional comments or feedback you would like to add?**

Electric vehicles are a technology that will allow reductions in the carbon intensity of the transportation sector. But there is a need for other technologies – like biofuels – to ensure that we do not need to wait significant time to meet a problem that needs further mitigation today. We encourage the Committee to look hard at low carbon, high octane biofuels as an important way to decarbonize the transportation sector.

Thank you again for the opportunity to provide our comments and our feedback on this request. Should you have any further questions or comments, please contact John Fuher of the Growth Energy staff at [jfuher@growthenergy.org](mailto:jfuher@growthenergy.org).

Sincerely,



Emily Skor, CEO  
Growth Energy