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GrowthEnergy.org

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Commodity Credit Corporation
USDA
1400 Independence Avenue, SW
Washington, DC 20250

Bette Brand
Administrator
Rural Business-Cooperative Service
USDA
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Stephenson and Ms. Brand,

Thank you for this opportunity to provide information on the Higher Blends Infrastructure Incentive Program (HBIIP).

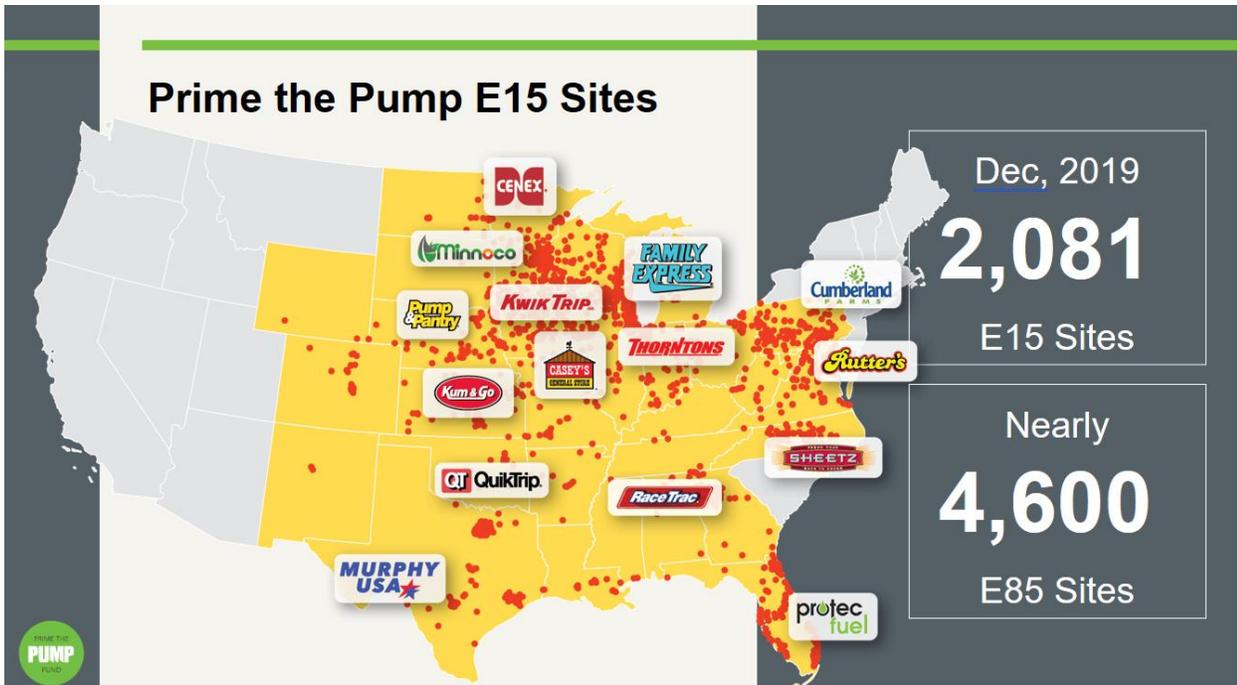
Growth Energy is the world's largest association of biofuels and supporters representing 103 ethanol plants and 96 associate members who serve the nation's need for renewable fuel.

Our industry, through the highly successful, Prime the Pump program, along with nearly all the current high-volume ethanol retailers were proud partners with the Department when it announced its Biofuels Infrastructure Partnership (BIP) in 2015, and we're poised to do so again with the HBIIP. By increasing the market for higher biofuel blends such as E15, USDA can help create more demand for farmers across the country and a win for American agriculture.

Since the approval of E15 in 2011, the retail and wholesale adoption of the fuel continues to grow. Today, there are more than 2000 high-volume fueling locations in 30 states and nearly 200 fuel terminals offering E15 to consumers and fuel retailers alike. American drivers have now logged more than 12 billion miles on the road, and fuel retailers have logged millions of transactions – all with no reported issues. As one major retailer remarked, "Our customers like this fuel. And now, they demand it."¹ With

¹ Lorenz, Mike, Testimony before the U.S. Senate Environment and Public Works Committee's legislative hearing on S. 517, the Consumer Fuel and Retailer Choice Act, June 14, 2017: https://www.epw.senate.gov/public/_cache/files/2/4/24b27dc4-3228-42c5-8610-d7532c27f587/EE647F9024622D076FA2CB8DB19B24E9.lorenz-testimony-06.14.2017.pdf

the fuel continuing to sell for as much to ten cents less per gallon than regular gasoline and a point higher in octane, we expect consumer adoption to only grow and grow.



In response to your request for information, we have attached our comment providing our insight and vast experience with the previous BIP program as well as other programs. Additionally, we have provided key recommendations for you as you work to implement this new program and how it can be successful for retailers, biofuel producers, and American farmers.

We appreciate this opportunity to comment and welcome any further questions. We look forward to working with the department as you construct and administer this important program.

Sincerely,

Chris Bliley, Senior Vice President of Regulatory Affairs