

**Statement of Chris Bliley,
Senior Vice President of Regulatory Affairs, Growth Energy**

EPA Hearing on the Fuels Regulatory Streamlining Proposed Rule

May 28, 2020

Thank you for the opportunity to virtually appear before you today to discuss the agency's proposal for the Fuels Streamlining regulation. My name is Chris Bliley and I'm the head of regulatory affairs for Growth Energy. Growth Energy is the largest renewable fuel organization in the world, representing 103 ethanol producers, 89 businesses in the ethanol value chain, and tens of thousands of biofuel supporters across the country.

Representing biofuel producers, we appreciate the agency's action to reduce burdensome and duplicative requirements on fuels and appreciate the process that the agency has taken on this proposal.

I want to focus my comments on E15. With E15 currently available at more than 2000 retail locations in 29 states and now available for year-round sale, any update to the fuel regulations should first and foremost, do no harm to the availability of this fuel. While there do not appear to be major impediments in the proposal, there is some confusion about the language on BOB certification and downstream oxygenate blending. With E15 now approved for year-round sale, it makes little sense why EPA would have substantially different BOB requirements for E10 and E15. At a minimum, if downstream oxygenate blenders choose to add 15% ethanol, they should not incur any additional requirements of that as a fuel manufacturer or refiner. We would ask that you work with retailers to simplify any BOB recertification, so that there are not any additional burdensome requirements added to the process to sell this fuel.

Additionally, while we have continued to seek removal of the burdensome E15 sampling requirement as unnecessary, we are pleased to see that EPA is taking steps to hopefully reduce costs to ethanol producers and retailers. As you know, since the approval of E15 in 2011, a fuel sampling program has been a requirement under the misfuelling mitigation regulation, and the costs have been solely borne by ethanol producers and retailers – costs that exceed a million dollars annually. By consolidating the various sampling programs including the E15 program, we

are hopeful that a larger group of participants including oil refiners and other fuel manufacturers will decrease costs for everyone.

Finally, I would be remiss in not mentioning that there remain additional regulatory hurdles to the sale of E15 that need to be addressed. In discussions last year, the EPA administrator committed to review the E15 label as well as remove hurdles to the sale of E15 through existing infrastructure. While these changes may not be within the scope of this rulemaking, it is important that the agency follow through on its commitments to help expand the availability of renewable fuels.

Thank you in advance for your consideration and we will be providing additional written comments.