

**Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth  
Energy  
EPA Hearing on the Vehicle Test Procedure Adjustments for Tier 3 Certification  
Fuel  
July 13, 2020**

Thank you for the opportunity to appear virtually before you today to discuss the agency's adjustments to the vehicle test procedure for Tier 3 certification fuel. 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.

Over the past two decades, we have seen tremendous growth in use of home-grown biofuels like ethanol. Ethanol is a low-carbon biofuel which reduces greenhouse gas emissions on average of 39 percent compared to gasoline. Today, 98 percent of our nation's gasoline is blended with 10 percent ethanol becoming the de facto fuel for American consumers, and with year-round approval of E15 and the potential of high octane, midlevel blends, we're poised to do much, much more. So, it was very appropriate that the Tier 3 fuel regulation change the certification fuel from E0 to E10.

While Growth Energy and a number of stakeholders will be providing more technical comments, there are several items that ought to be given important consideration to ensure that automakers are not discouraged from using ethanol blends now or into the future. While we are pleased to see that EPA finally taking action to adjust the R-factor from its value set decades ago, it still falls short with a value of 0.81 rather than 1.0. There has been a wealth of research in this area by the national labs, among others, and doing so fails to recognize the myriad of advancements in technology, giving automakers 80 percent of the appropriate value.

Additionally, we are concerned about the adjustment factor that would result in higher reporting of carbon dioxide than what is measured at the tailpipe. Doing so would penalize automakers for the use of low carbon fuels, something that should be strongly encouraged given the benefits of low carbon biofuels, such as ethanol, toward reducing greenhouse gas emissions and improving air quality.

Also, with any regulatory program, it is necessary to provide as much certainty as possible, particularly for development of engine and fuel technologies that require significant lead time.

Our foremost goal is that any changes to procedures must not stifle the development and innovation of engine and fuel technologies. We look forward to working with the agency to address these technical issues, so that we can continue to give automakers and policymakers the tools necessary to foster the use of ethanol blends - particularly as we look to the use of high octane, midlevel ethanol blends to meet current and future greenhouse gas standards. Thank you in advance for your consideration and we will be providing additional written comments.