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GrowthEnergy.org

August 14, 2020

Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
By Electronic Mail
Docket ID: EPA-HQ-OAR-2016-0604

RE: Vehicle Test Procedure Adjustments for Tier 3 Test Fuel

Administrator Wheeler:

Growth Energy is the nation's largest renewable fuel organization representing 89 biofuel producers, nearly 100 associated businesses in the biofuel supply chain, and tens of thousands of biofuel supporters across the country. We believe expanding our nation's fuel mix with more biofuel will continue to lower costs for consumers, revitalize our rural economy, and improve our environment.

Thank you for this opportunity to provide comment on the agency's proposal on the vehicle test procedure adjustments for Tier 3 test fuel. Over the past two decades, we have seen tremendous growth in use of home-grown biofuels like ethanol. The use of biofuels in our country has become universal, with 98 percent of every gallon of gasoline now containing at least 10 percent ethanol, more than 2,000 retail locations with E15, and more than 4,000 locations offering E85 for flex fuel vehicles. Additionally, the use of high octane, midlevel ethanol blends offers tremendous potential for the vehicle fleet of the future. Therefore, it was very appropriate that the Tier 3 fuel regulation change the certification fuel from E0 to E10.

Several items 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 EPA finally take action to adjust the R-factor from the value set decades ago, the R-factor still falls short with a value of 0.81 rather than 1.0. EPA's updated value for the R-factor fails to reflect real-world numbers or recognize the myriad of advancements in technology and the wealth of research in this area by national laboratories and others.

Additionally, we are concerned about the adjustment factor that would result in higher reports of carbon dioxide than what is measured at the tailpipe. This would unnecessarily penalize

automakers for the use of low carbon fuels. The use of low-carbon biofuels, such as ethanol, should be strongly encouraged given the benefits 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 the 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 your 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.

Sincerely,



Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy