Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth Energy on EPA's Hearing on the Proposed Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026

Thank you for the opportunity to appear today to discuss the proposal to revise GHG emission standards for light duty vehicles. My name is Chris Bliley and I am the Senior Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the world's largest association of biofuel producers. Together, we remain committed to helping our country diversity its energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuel for consumers.

We appreciate EPA's work to reshape the nation's transportation mix to make it more sustainable as it is a central driver for our industry as well. Vehicles and fuels operate as a system and liquid fuels will continue to play a dominant role in the transportation sector for decades to come, even as alternative technologies flourish. As such, it is imperative to consider the vital role that environmentally sustainable fuel options such as ethanol will play in reducing greenhouse gas emissions from the current and future vehicle fleet.

Ethanol is an available and affordable means to immediately clean up our liquid fuel supply. Recent data from EH&E show today's corn ethanol reduces greenhouse gas emissions by an average of 46 percent compared to gasoline and can provide reductions of up to 70 percent with the use of readily available technologies. Ethanol's other environmental benefits are also noteworthy. As has been researched, the use of more ethanol and ethanol-blended fuel reduces air toxics such as carbon monoxide, benzene, and other harmful particulates.

With a stable policy and access to drivers, we believe we can deliver low-carbon, low-cost, high-performing, sustainable vehicle fuel solutions that reduce greenhouse gas emissions now and well into the future.

Today, E15 is approved for all 2001 and newer vehicles, more than 95 percent of today's vehicle fleet. One recent study found that by moving to E15 nationwide, we can immediately reduce greenhouse gas emissions by more than 17 million tons, the equivalent of taking nearly 4 million cars off the road. Also, by using E85 in the millions of flex-fuel vehicles on the road today, even greater reductions in GHG emissions and air toxics can be achieved.

Additionally, it is imperative to consider the benefits of using high octane, low carbon fuels to make engines more efficient. Growth Energy has been a leader on the need for higher octane, midlevel ethanol blends, first submitting a proposal for a 100 RON, E30 fuel nearly a decade ago. The science supporting the benefits of a high-octane, low

carbon midlevel blend in conjunction with a high compression ratio engine is not new, and has been well-explored by the national labs, automobile manufacturers, and other scientific institutions.

To achieve these important benefits, we urge the EPA to provide strong and clear policy to encourage the adoption of high octane, low carbon ethanol blends:

1. EPA should take action to encourage the use of blends such as E15 and E85 in today's vehicle fleet.
2. EPA should require a minimum octane standard. Higher octane fuels give automakers greater flexibility to meeting the proposed standards.
3. EPA should approve a high octane, midlevel ethanol fuel for vehicle certification such as the 100 RON, E30 that Growth Energy first proposed.
4. EPA and NHTSA should work together to re-establish credits for the production of flex-fuel vehicles.
5. EPA should establish strong volumes for the RFS for 2021, 2022, and well into the future to encourage the use of low-carbon biofuels.
6. Finally, I would reiterate the call on EPA to provide a solution on RVP for all ethanol blends above 10 percent. It makes little sense why low-carbon biofuel blends should be restricted from the market for 3 months out of the year.

Thank you for your consideration and we look forward to working with you on fuel solutions to achieve meaningful improvement in air quality.

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