growth energy™
America's Ethanol Supporters

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October 29, 2021

Alexis Taylor
Director
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301

Dear Director Taylor,

Growth Energy is the world's largest association of biofuel producers, representing 92 U.S. plants that each year produce nearly 8 billion gallons of cleaner-burning, renewable fuel. We also represent 91 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we remain committed to bringing better and more affordable choices at the fuel pump to consumers, helping our country diversify our energy portfolio in order to grow more energy jobs, sustaining family farms, and driving down the costs of transportation fuels for consumers.

Today, 98 percent of all gasoline sold in the U.S. contains 10 percent ethanol; E15 is now available at more than 2,500 retail locations in 30 states. E15 is approved for all 2001 and newer vehicles representing more than 97% of the vehicle miles traveled on the road today and more than 9 out of ten cars on the road. Consumers have now driven more than 25 billion miles on E15, and retailers have conducted millions of transactions with this fuel. There have been no adverse reports of fuel quality experienced with E15 since first being approved more than a decade ago. A recent study has also shown that if Oregon moved to statewide E15, the state could reduce greenhouse gas emissions by 190,000 tons annually – the equivalent of removing nearly 41,000 cars from Oregon roads each year. Additionally, as a nation, if we move to E15, it will save consumers $12.2 billion in fuel costs each year.

Growth Energy strongly commends the department for its support of E15 sales in Oregon and strongly supports this proposal to clarify the legal sale of E15 in the state. We appreciate this opportunity to comment on this proposed rule and other actions by the department to facilitate sales of E15 and higher biofuel blends. We have a couple of brief comments on the proposal as follows:

1. On page 4, under section "(5) 'Automotive Fuel Rating'", the proposal specifies that "(d) for ethanol flex fuels, a disclosure of the ethanol component, expressed as the percentage by volume and the text, 'Use Only in Flex-Fuel Vehicles/May Harm Other Engines.'" Then on page 18, under section "(8) Ethanol Flex Fuel, (a) How to Identify

Ethanol Flex Fuel. – Ethanol flex fuel shall be identified as Ethanol Flex Fuel or EXX Flex Fuel, or E85. (b) FTC Labeling Requirement – Ethanol flex fuel shall be identified and labeled in accordance with the Federal Trade Commission Automotive Fuel Ratings". We would ask that you harmonize these sections while allowing retailers of ethanol flex-fuel to use common product marketing terms such as "E85".

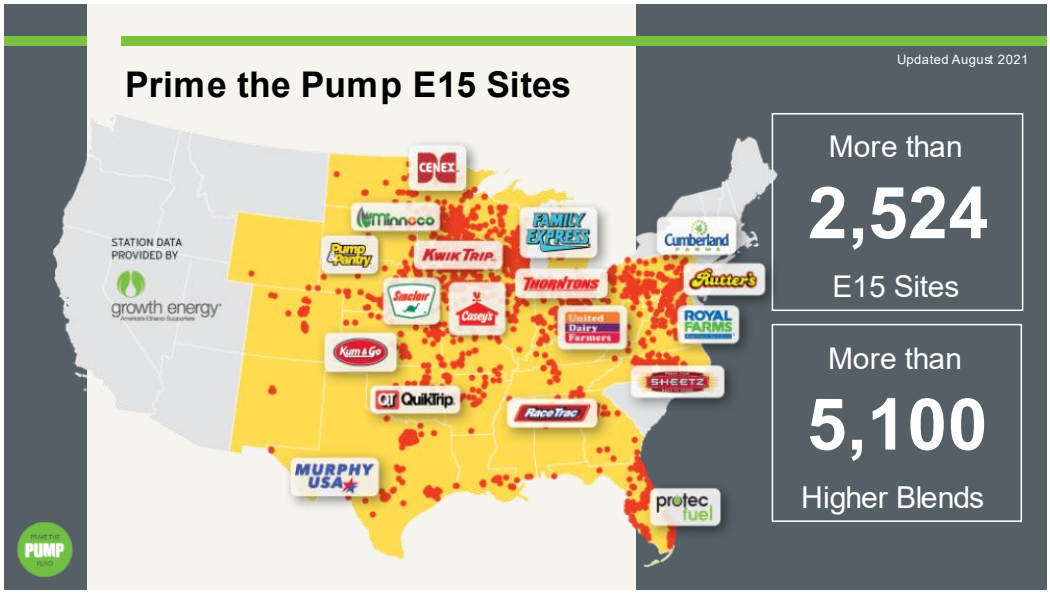
2. On page 9, the proposal specifies "(2) Denatured Fuel Ethanol intended for blending with gasoline shall meet the requirements of ASTM D-4806, 'Standard Specification for Denatured Fuel Ethanol for Blending with Gasolines for Use as Automotive Spark-Ignition Fuel' and the ethanol component shall be derived from agricultural product, woody waste or residue.'" If the department updates the definition of agricultural products, we recommend specifying inclusion of "corn" and "sorghum".

Given our extensive industry experience as well as with retailers around the country offering ethanol blends, we are happy to answer any questions and assist the department with any issues related to the sale of E15. Again, we appreciate the department's move forward with this important rule to approve the sale of E15 in Oregon. Thank you in advance for your consideration.

Sincerely,

Chris Bliley, Senior Vice President of Regulatory Affairs

CC: Steven Harrington, Program Manager, Motor Fuel Quality



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