
**Testimony of Chris Bliley, Senior Vice President of Regulatory Affairs, on the Ozone State
Implementation Plan**

*As prepared for delivery to the Denver Regional Air Quality Council Board Meeting
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Thank you for this opportunity to appear today to discuss the draft state implementation plans for ozone national ambient air quality standards for 2008 and 2015 for the Denver Metro/North Front Range Nonattainment Area.

My name is Chris Bliley, and I am the Senior Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the nation's largest association of biofuel producers, representing 89 U.S. plants that each year produce more than 8 billion gallons of cleaner-burning, renewable fuel, including Colorado's three biorefineries: Front Range Energy, Yuma Ethanol, and Sterling Ethanol. Together, our members are working to bring better and more affordable fuel choices at the pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio to grow more jobs, sustain family farms, and reduce the costs of transportation fuels for consumers.

We understand that the Denver Metro/North Front Range area faces air quality challenges specifically related to ozone precursor emissions and appreciate the Regional Air Quality Council's deliberate and thoughtful approach to strategies to address these challenges. As the region eyes changes to their fuel and a move to reformulated gasoline, we offer several comments on the potential to use higher biofuel blends to help improve air quality, reduce consumer costs, and grow Colorado jobs.

As data continues to show, the use of higher biofuel blends such as E15 can help the Council's efforts to improve air quality. In fact, the California Air Resources Board in conjunction with the University of California-Riverside just published results of a 20-vehicle study on the emissions of E15 with reformulated gasoline. The results show that E15 showed a "decreasing ozone forming potential trend", "strong, statistically significant" reductions of particulates, as well as significant reductions of carbon monoxide. These are precisely the types of reductions that would help the region as it strives to get into attainment.

Additionally, it makes little sense why Colorado and other Rocky Mountain states continue to use 85 octane regular gasoline while the rest of the country uses 87 octane fuel. Today's engine control systems have obviated the need for the use of these lower-octane fuels. By moving to higher-octane fuel through the use of higher ethanol blends like E15, it can further help to

reduce tailpipe emissions through more complete combustion and the reduction of engine knock.

In addition to the air quality benefits, where E15 is available, we are seeing significant cost-savings for drivers with E15 selling as much as a dollar less per gallon than regular gasoline. Today, E15 is available at 46 locations in Colorado with significant room for growth. The key for E15 is consumer access. If reformulated gasoline is ultimately required, it would provide vapor-pressure parity for sale of E15 and allow Colorado drivers to access E15 year-round. However, the Council and state proceed on the SIP, you must ensure that E15 and E10 (regular gasoline) have this parity, so that consumers can continue to access E15 all year-round, especially during the summer driving season.

Thank you for your consideration and we are happy to work with you to maximize the benefits of higher biofuel blends to help the Council achieve its air quality goals.